

SEA LINK

EN020026

Local Impact Report

Suffolk County Council

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Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>(SCH)AONB</i>	<i>(Suffolk Coast & Heaths) Area of Outstanding Natural Beauty</i>
<i>(d)DCO</i>	<i>(draft) Development Consent Order</i>
<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>BMV</i>	<i>Best and Most Versatile (agricultural land) [which is defined as Grades 1, 2 and 3a under the Agricultural Land Classification system]</i>
<i>CEMP</i>	<i>Construction Environmental Management Plan</i>
<i>CTM&TP</i>	<i>Construction Traffic Management and Travel Plan</i>
<i>EA</i>	<i>Environment Agency</i>
<i>EA1</i>	<i>East Anglia ONE</i>
<i>EA1N</i>	<i>East Anglia ONE North</i>
<i>EA2</i>	<i>East Anglia TWO</i>
<i>EA3</i>	<i>East Anglia THREE</i>
<i>ECA</i>	<i>Environmental Colour Assessment</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ESC</i>	<i>East Suffolk Council</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>GW</i>	<i>Gigawatt</i>
<i>HGV</i>	<i>Heavy Goods Vehicle</i>
<i>HVDC</i>	<i>High Voltage Direct Current</i>
<i>kV</i>	<i>Kilovolt</i>
<i>(o)LEMP</i>	<i>(Outline) Landscape and Ecological Management Plan</i>
<i>LHA</i>	<i>Local Highway Authority</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>MHCLG</i>	<i>Ministry of Housing, Communities and Local Government</i>
<i>NGET</i>	<i>National Grid Electricity Transmission</i>
<i>NGV</i>	<i>National Grid Ventures</i>
<i>NMU</i>	<i>Non-Motorised User</i>
<i>NPPF</i>	<i>National Planning Policy Framework</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>NPS</i>	<i>National Policy Statement</i>
<i>PI</i>	<i>Planning Inspectorate</i>
<i>PRoW</i>	<i>Public Rights of Way</i>
<i>SANG</i>	<i>Suitable Alternative Natural Greenspace</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SCLP</i>	<i>Suffolk Coastal Local Plan</i>
<i>SECHNL</i>	<i>Suffolk and Essex Coast & Heaths National Landscape</i>
<i>SMWLP</i>	<i>Suffolk Minerals & Waste Local Plan</i>
<i>SoCG</i>	<i>Statement of Common Ground</i>

<i>SoS</i>	<i>Secretary of State</i>
<i>SPA</i>	<i>Special Protection Area</i>
<i>SPR</i>	<i>ScottishPower Renewables</i>
<i>SSSI</i>	<i>Site of Special Scientific Interest</i>
<i>STEM</i>	<i>Science, Technology, Engineering and Maths</i>
<i>SuDS</i>	<i>Sustainable Drainage System</i>
<i>(o)WSI</i>	<i>(Outline) Written Scheme of Investigation</i>

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

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a Local Impact Report (“LIR”) detailing the policy context, assessment of impacts, and required mitigation and/or compensation. The assessment of impacts has been separated by service area. Examination Library references are used throughout to assist readers.

Appendices

Policies, Strategy, and Reference Documents

- 1 Order Limits for the Proposed Development
- 2 Map showing the NSIPs affecting Suffolk
- 3 The Horlock Rules
- 4 Extracts from Suffolk County Council's Suffolk Minerals and Waste Local Plan 2020
- 5 Extracts from East Suffolk Council's Suffolk Coastal Local Plan 2020
- 6 Extracts from Leiston Neighbourhood Plan
- 7 Extracts from Saxmundham Neighbourhood Plan
- 8 Extracts from Saxmundham Draft Modified Neighbourhood Plan
- 9 Extracts from Aldringham-cum-Thorpe Neighbourhood Plan as Submitted
- 10 The Suffolk Economic Strategy
- 11 Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-2028
- 12 Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators
- 13 Map showing the general distribution of agricultural land classification in the area of the Proposed Development
- 14 British Horse Society Advice on Construction Sites and Horses
- 15 Royal College of Physicians (2016); 'Every breath we take: the lifelong impact of air pollution' – a call for action
- 16 World Health Organization Global Air Quality Guidelines

Overview

1 Introduction

- 1.1 Suffolk County Council (“SCC”) is a statutory consultee for Nationally Significant Infrastructure Projects (“NSIPs”). Officers have scrutinised the proposals submitted by National Grid Electricity Transmission (“NGET”) and have spoken with local communities, local Councillors, East Suffolk Council, Kent County Council, Thanet District Council, Dover District Council, and Suffolk & Essex Coast & Heaths National Landscape Partnership.
- 1.2 This Local Impact Report (“LIR”) has been prepared in accordance with s60(3) of the Planning Act 2008 (as amended) and having regard to the guidance in the Planning Inspectorate’s guidance Nationally Significant Infrastructure Projects: Advice for Local Authorities, and the Ministry of Housing, Communities and Local Government (“MHCLG”) guidance Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects.
- 1.3 SCC has considerable experience of the NSIP regime, and this LIR has been prepared by a wide group of officers from the Council with a wealth of experience in their respective technical areas.
- 1.4 It is important for the Council to clearly set out its concerns to the Examining Authority (“ExA”) at this stage, in order to influence changes and improvements to the proposals before the ExA makes its recommendations to the Secretary of State (“SoS”).
- 1.5 SCC recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed, including:
- the proposed use of Benhall Railway Bridge on the B1121 (a County Council asset) for access to the converter station site at Saxmundham, as its structural condition and the complications of constructing an overbridge will create difficulties transporting Abnormal Indivisible Loads (“AILs”) and risks of consequential disruption for the adjacent A12, part of the County’s Major Road Network.
 - the impacts of construction work taking place on Sundays and Bank Holidays, providing the local community with no respite.
 - the significant adverse effects of the proposed River Fromus crossing on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist’s Church, Saxmundham (Grade II* Listed Building); and

- the lack of coordination with other projects (most notably National Grid Ventures' ("NGV's") proposed LionLink project.

Energy and Climate Adaptive Infrastructure Policy

- 1.6 At its Cabinet meeting on 16 May 2023, Suffolk County Council updated its adopted Energy Infrastructure Policy, indicating its overall stance on projects required to deliver the UK's Net Zero ambitions (see Sources of Further Information section). The policy states:
- 1.7 *"Suffolk County Council has declared a Climate Emergency and is therefore predisposed to supporting projects that are necessary to deliver Net-Zero Carbon for the UK. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."*¹

Cabinet Resolution

- 1.8 At its Cabinet meeting on the 13 May 2025, SCC resolved to:
- i. in accordance with the County Council's Energy and Climate Adaptive Infrastructure Policy, recognise the importance of the Sea Link proposals as part of the required infrastructure to connect low carbon energy generation developments that will reduce carbon emissions and help to meet the need to mitigate a changing climate but;
 - ii. object to the proposals as currently formulated and make this clear in its response to the Planning Inspectorate ("PINS") as they do not adequately address significant issues. The County Council expects, in the highlighted areas, clearer assessments, outcomes and mitigations to be achieved during the Examination.
 - iii. confirm the significant issues to include:
 - the proposed use of Benhall Railway Bridge on the B1121 for access to the converter station site, due to its structural condition and potential issues with constructing an overbridge;
 - the impacts of the proposed River Fromus crossing, which the County Council deems to be a disproportionate solution to access the converter station site and will cause significant adverse effects on the local landscape character and heritage assets, including the Grade II listed Hurts Hall and Grade II* listed Church of St John the Baptist;
 - the inclusion of 7am-5pm on Sundays and Bank Holidays within the core working hours, providing the local community with no respite from

¹ [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(16-05-2023\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-05-2023),%20The%20Cabinet)

the construction works; and

- a lack of coordination with other projects (most notably National Grid Ventures' ("NGV's") proposed LionLink project).²

² [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(13-05-2025\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(13-05-2025),%20The%20Cabinet)

2 Terms of Reference

Introduction

- 2.1 National Grid Electricity Transmission (referred to as NGET or the Applicant) has submitted a DCO application for a 2 gigawatt (“GW”) High Voltage Direct Current (“HVDC”) undersea electricity link between Suffolk and Kent. This Local Impact Report addresses the local impacts of the proposals.

Scope

- 2.2 The LIR relates to the impacts of the proposed scheme as they affect the administrative area of Suffolk County Council. Suffolk County Council is an upper tier local authority, and East Suffolk Council (“ESC”) is a lower tier local authority within the part of the County that will host the proposed works.
- 2.3 The report specifically describes the impact of Works (described in full in the DCO application) namely:
- Construction, operation and decommissioning of a 2 GW HVDC undersea electricity link between Suffolk and Kent, including onshore infrastructure (a converter station south of Saxmundham, a bridge over the River Fromus for permanent access to the converter station, underground onshore Direct Current (“DC”) and Alternating Current (“AC”) cables, and a transition joint bay).
 - Connection to the Friston (Kiln Lane) substation, consented under ScottishPower Renewables’ (“SPR’s”) East Anglia ONE North (“EA1N”) and East Anglia TWO (“EA2”) projects (and construction of this substation if it were to not be constructed under its existing consent), and.
 - other construction activities and temporary works associated with the above works.
- 2.4 This LIR does not describe the Works any further, relying on the Applicant’s descriptions as set out in the DCO application documents.
- 2.5 The Council has experience with the DCO process and post-consent phases of other projects, including East Anglia ONE (“EA1”) Offshore Wind Farm, which was consented in 2014 and is operational, and the East Anglia THREE (“EA3”) Offshore Wind Farm, which was consented in 2017 and is under construction. Suffolk County Council also has experience in dealing with other significant energy DCOs in Suffolk, including the EA1N and EA2 Offshore Wind Farms, Sizewell C nuclear power station, the Bramford to Twinstead Reinforcement, and the Sunnica Energy Farm, all of which are consented. Suffolk County Council also participated in the examinations of the Five Estuaries and North Falls Offshore Wind Farms, which are awaiting decisions. Suffolk County Council is also familiar with a promoter’s responsibilities

under the PA 2008 regime, having successfully promoted the Lake Lothing Third Crossing DCO at Lowestoft, now in operation as the Gull Wing Bridge.

- 2.6 The Order Limits largely encompass greenfield land, other than where they encompass mineral workings, watercourses, or the public highway.
- 2.7 The Council continues to engage with the Applicant through the draft Statement of Common Ground (“SoCG”) process, with a view to narrowing the issues in dispute.

Purpose and Structure of the LIR

- 2.8 Section 60(3) of the Planning Act 2008 defines Local Impact Reports as:
 - i. *“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).”³*

- 2.9 The Planning Inspectorate (“PINS”)’s “Advice for Local Authorities” advises as regards a Local Impact Report: -

“The report should give details of the likely impact of a project on the local authority’s area. Sections 104(2)(b) and 105(2)(a) of the Planning Act explains that the Examining Authority and the Secretary of State must have regard to any LIR submitted when deciding the application. Therefore, local authorities should not underestimate the importance of the report.

The report should cover any topic the local authority consider is relevant to the impact of the project on their area and the local communities affected...

The purpose of the LIR is to make the Examining Authority aware of the potential impacts of the project based on local knowledge. It is a technical evidence-based assessment of all the impacts. The LIR is therefore not the document where the local authority should set out its objections or support for the application (see relevant representations).”

The PINS Advice also states: -

“The content of the LIR is a matter for the local authority. The Examining Authority will be assisted by the submission of a LIR that clearly sets out and evaluates the impacts in a structured manner ...”

- 2.10 This LIR provides details of the likely impact of the proposals under topic-based headings reflecting the likely nature of the impacts. The key issues for the Council under each topic are identified, followed by commentary on the extent to which the Applicant has sufficiently addressed these issues by reference to relevant policy, and the application documentation as relevant. Where the Council considers that key issues have not (as yet) been adequately addressed, the likely impacts, as identified in the LIR, do provide the basis for the Council’s objections (as matters stand) to the proposals. The Council considers that there would be undue and unnecessary repetition in

³ <https://www.legislation.gov.uk/ukpga/2008/29/section/60>

setting out the same matters as objections in a separate written representation. To overcome the Council's objections the Applicant is urged to address the key issues and the Council respectfully invites the Examining Authority to encourage the Applicant to do so.

- 2.11 Where the Applicant has sought to address these concerns, these will be referenced to the application documentation, including the DCO articles, requirements, and obligations where relevant.

3 Description of the Area of the Proposed Development

- 3.1 The proposed development is one of a significant number of NSIPs that are proposed in, are being approved in, or affect Suffolk.
- 3.2 This project is within the East Suffolk District, which has several NSIPs in various stages of the DCO process. These include the consented Sizewell C nuclear power station, located in the parish of Leiston. The Sizewell C main development site is approximately 5 km north of Sea Link's proposed landfall point.
- 3.3 The character of the area is predominantly rural, with a dispersed pattern of small towns, villages, and farmsteads.
- 3.4 The proposed development has impacts on the highly sensitive landscape of the statutorily designated Suffolk and Essex Coast & Heaths National Landscape ("SECHNL") (formally known as Suffolk Coast & Heaths Area of Outstanding Natural Beauty ("SCHAONB")). Parts of the Order Limits are also within the Leiston-Aldeburgh Site of Special Scientific Interest ("SSSI"), and close to the Sandlings Special Protection Area ("SPA") and North Warren RSPB Reserve.
- 3.5 The landfall point of the proposed development is within the parish of Aldeburgh. The cable route is proposed to pass through the parishes of Aldeburgh, Friston, Knodishall, Sternfield and Saxmundham, connecting to a substation in Friston and a converter station site at the border of the Sternfield and Saxmundham parishes.
- 3.6 The converter station site is proposed to accommodate up to two other converter stations. At the time of writing, NGV's LionLink project is the only other project proposing to locate its converter station at the site.
- 3.7 The substation at Friston to which the proposed development would connect is already consented under SPR's EA1N/EA2 project. The proposed development also includes seeking consent for that substation, to cater for a scenario where it is not delivered as part of the EA1N/EA2 project. NGV's LionLink project is also proposing a connection at the Friston substation.
- 3.8 The area around the substation is also subject to a proposal under the Town & Country Planning Act regime for a ground-mounted solar array and associated battery-switch room.

Appendix 1 is a map of the Order Limits of the proposed development, showing the local context.

Appendix 2 shows the proposed and consented NSIPs affecting Suffolk.

4 Policy Context

National Policy

Powering Up Britain

- 4.1 The Powering Up Britain document sets out how the Government will enhance our country's energy security, seize the economic opportunities of the transition, and deliver on our net zero commitments.⁴

A Green Future: Our 25 Year Plan to Improve the Environment

- 4.2 The "A Green Future: Our 25 Year Plan to Improve the Environment" document is the Government's high level environmental strategy which includes targets in a number of relevant areas.⁵

The UK's Industrial Strategy

- 4.3 The aim of the Industrial Strategy was "to boost productivity by backing businesses to create good jobs and increase the earning power of people throughout the UK with investment in skills, industries and infrastructure."⁶
- 4.4 The Industrial Strategy includes the Offshore Wind: Sector Deal which outlines support for a massive increase in offshore wind electricity off the east coast (and the consequent requirement to increase onshore infrastructure to cope with this).⁷

National Policy Statements

- 4.5 NPS (EN-1) is the overarching national policy statement for energy and was published in November 2023 and updated in January 2024. This sets out the UK Government's commitment to increasing renewable generation capacity and recognises that in the short to medium term, much of the new capacity is likely to come from onshore and offshore wind.⁸
- 4.6 NPS (EN-3) is the UK Government's strategy for renewable energy infrastructure.⁹
- 4.7 NPS (EN-5) is the UK Government's strategy for electricity networks infrastructure. This policy statement applies to not only transmission systems

⁴ <https://www.gov.uk/government/publications/powering-up-britain>

⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

⁶ <https://www.gov.uk/government/topical-events/the-uks-industrial-strategy>

⁷ <https://www.gov.uk/government/publications/offshore-wind-sector-deal/offshore-wind-sector-deal#infrastructure-2>

⁸ <https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f637052/overarching-nps-for-energy-en1.pdf>

⁹ <https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf>

but also associated infrastructure such as substations and converter stations. This policy statement sets out the general principles that should be applied in the assessment of development consent application across the range of energy technologies.¹⁰

National Planning Policy Framework

- 4.8 The National Planning Policy Framework (“NPPF”) was last updated in December 2024 and provides national policy in respect of proposals under the Town & Country Planning Act 1990. It is however also a material consideration when considering NSIP proposals.¹¹

Horlock Rules

- 4.9 The Horlock Rules are National Grid’s guidelines for the siting and design of substations (see Appendix 3).

Community Benefits Consultation

- 4.10 The Government consulted on a recommended approach to community benefits for electricity transmission network in 2023.¹² The government response, published in November 2023, stated that voluntary guidance on community wide benefits and information on developing a mandatory policy approach would be published in 2024.¹³

A working paper seeking further views on community benefits and shared ownership of low carbon energy infrastructure was then published in May 2025.

Development Plan

- 4.11 The relevant documents that comprise the Development Plan are identified below in Table 1 and where the policies they contain are relevant is shown in Table 2.
- 4.12 The full text of the relevant Development Plan policies can be founded in Appendices 4-7.
- 4.13 The general presumption in favour of sustainable development is noted in ESC’s Suffolk Coastal Local Plan and its operation, in relation to development plan policies, is explained in the NPPF. Therefore, it is not discussed any further below.

¹⁰<https://assets.publishing.service.gov.uk/media/65a78a5496a5ec000d731abb/nps-electricity-networks-infrastructure-en5.pdf>

¹¹https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

¹²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1146742/community_benefits_for_electricity_transmission_network_infrastructure.pdf

¹³<https://assets.publishing.service.gov.uk/media/655cda1dd03a8d000d07fe0b/community-benefits-for-electricity-transmission-network-infrastructure-govt-response.pdf>

Suffolk County Council

- 4.14 Suffolk County Council adopted the Suffolk Minerals and Waste Local Plan (“SMWLP”) in 2020 (see Appendix 4).

East Suffolk Council

- 4.15 The Suffolk Coastal Local Plan (“SCLP”) (covering the former Suffolk Coastal area) was adopted by Full Council on 23 September 2020.
- 4.16 The relevant policies of the Suffolk Coastal Local Plan will be referred to within this LIR where appropriate, and relevant extracts are included at Appendix 5.

Neighbourhood Plans

- 4.17 The following Neighbourhood Plans cover areas which are affected by the proposals in some way:
- i. Leiston Neighbourhood Plan (relevant extracts can be found in Appendix 6)
 - ii. Saxmundham Neighbourhood Plan (relevant extracts can be found in Appendix 7)
 - iii. Saxmundham Draft Modified Neighbourhood Plan – Regulation 14 pre-submission consultation has been completed, awaiting Regulation 15 submission to the Local Planning Authority (relevant extracts can be found in Appendix 8)
 - iv. Aldringham-cum-Thorpe Neighbourhood Plan – Submission version (relevant extracts can be found in Appendix 9). Examination began 4th August 2025

Further Information

- 4.18 Further consideration of how the proposals interact with the adopted and draft development plan policies is provided in the issue-based chapters below.

Table 1: Development Plan for the East Suffolk District Council Area

Area	Subject	Comment
Suffolk CC	Suffolk Minerals & Waste Local Plan ¹⁴	Adopted July 2020
East Suffolk DC	Suffolk Coastal Local Plan	Adopted September 2020
East Suffolk DC	Waveney Local Plan*	Adopted March 2019
Beccles TC	Beccles Neighbourhood Plan*	Made September 2021
Bredfield PC	Bredfield Neighbourhood Plan*	Made May 2021
Bungay TC	Bungay Neighbourhood Plan*	Made November 2022
Carlton Colville TC	Carlton Colville Neighbourhood Plan*	Made May 2025
Easton PC	Easton Neighbourhood Plan*	Made July 2024
Framlingham TC	Framlingham Neighbourhood Plan*	Made March 2017
Great Bealings PC	Great Bealings Neighbourhood Plan*	Made March 2017
Halesworth TC	Halesworth Neighbourhood Plan*	Made February 2023
Kesgrave TC	Kesgrave Neighbourhood Plan*	Made May 2021
Kessingland PC	Kessingland Neighbourhood Plan*	Made January 2017
Leiston PC	Leiston Neighbourhood Plan	Made March 2017

¹⁴ <https://www.suffolk.gov.uk/planning-waste-and-environment/suffolk-minerals-and-waste-plan>

Lound, Ashby, Herringfleet and Somerleyton PCs	Lound, Ashby, Herringfleet and Somerleyton Neighbourhood Plan*	Made July 2022
Martlesham PC	Martlesham Neighbourhood Plan*	Made July 2018
Melton PC	Melton Neighbourhood Plan*	Made January 2018
Mutford PC	Mutford Neighbourhood Plan*	Made December 2019
Otley PC	Otley Neighbourhood Plan*	Made September 2025
Oulton PC	Oulton Neighbourhood Plan*	Made February 2023
Playford PC	Playford Neighbourhood Plan*	Made June 2024
Rendlesham PC	Rendlesham Neighbourhood Plan*	Made March 2015
Reydon PC	Reydon Neighbourhood Plan*	Made May 2021
Rushmere St Andrew PC	Rushmere St Andrew Neighbourhood Plan*	Made June 2023
Ufford PC	Ufford Neighbourhood Plan*	Made July 2025
Saxmundham PC	Saxmundham Neighbourhood Plan	Made July 2023
Shadingfield, Sotterley, Willingham, and Ellough PC	Shadingfield, Sotterley, Willingham, and Ellough Neighbourhood Plan*	Made June 2023

Southwold TC	Southwold Neighbourhood Plan*	Made February 2022
Wenhaston with Mells Hamlet	Wenhaston with Mells Hamlet Neighbourhood Plan*	Made July 2018
Westerfield PC	Westerfield Neighbourhood Plan*	Made May 2025
Wickham Market PC	Wickham Market Neighbourhood Plan*	Made November 2023
Worlingham PC	Worlingham Neighbourhood Plan*	Made November 2022

*Not directly affected by the proposed development

Table 2: Local Plan Policy Interactions

	Landscape and visual	Ecology and Biodiversity	Cultural Heritage	Water Environment	Geology and Hydrogeology	Agriculture and Soils	Traffic and Transport (including Public Rights of Way)	Air Quality	Socioeconomics, Recreation and Tourism	Health and Wellbeing
Suffolk Minerals & Waste Local Plan Policies										
MP9 Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt, and recycled materials										
MP10 Minerals consultation and safeguarding areas										
WP18 Safeguarding of waste management sites										
East Suffolk District Council – Suffolk Coastal Local Plan (SCLP) Policies										
SCLP2.2 Strategic Infrastructure Priorities										
SCLP3.1 Strategy for Growth										
SCLP3.4 Proposals for Major Energy Infrastructure Projects										
SCLP3.5 Infrastructure Provision										

SCLP4.5 Economic Development in Rural Areas										
SCLP6.1 Tourism										
SCLP7.1 Sustainable Transport										
SCLP7.2 Parking Proposals and Standards										
SCLP8.2 Open Space										
SCLP9.5 Flood Risk										
SCLP9.6 Sustainable Drainage Systems										
SCLP10.1 Biodiversity and Geodiversity										
SCLP10.3 Environmental Quality										
SCLP10.4 Landscape Character										
SCLP11.1 Design Quality										
SCLP11.2 Residential Amenity										
SCLP11.3 Historic Environment										
SCLP11.4 Listed Buildings										
SCLP11.6 Non-Designated Heritage Assets										
SCLP11.7 Archaeology										
SCLP11.8 Parks and Gardens of Historic or Landscape Interest										
SCLP12.28: Strategy for Saxmundham										
SCLP12.29: South Saxmundham Garden Neighbourhood										

Other Relevant Local Policy

Summary

- 4.19 The following paragraphs note several additional documents produced and endorsed by the relevant authorities which represent local policy on specific topics which the Council consider of relevance to the proposed developments.
- 4.20 The Council has declared a climate emergency and has targets and objectives in relation to this.
- 4.21 Suffolk County Council Cabinet adopted the updated Energy and Climate Adaptive Infrastructure Policy at its meeting on 16 May 2023, which indicates the predisposition of the Council to support projects that are necessary to deliver Net-Zero Carbon for the UK. However, in order to be able to support a project, Suffolk County Council expects that any impacts are appropriately dealt with.¹⁵
- 4.22 Suffolk County Council, as Local Highway Authority (“LHA”), published the Suffolk Local Transport Plan 2025-2040, which provides the context, policy, and objectives for improving travel options in Suffolk. The Suffolk Local Cycling and Walking Infrastructure Plan and the fifteen Area Transport Plans outline how the Council proposed to implement the Local Transport Plan in key locations across the county.¹⁶
- 4.23 Suffolk County Council has also published a Green Access Strategy, which is a rights of way improvement plan, covering the period 2020 to 2030.¹⁷
- 4.24 Suffolk Community Engagement and Wellbeing Supplementary Guidance Document¹⁸. This SGD sets out Suffolk County Council’s expectations for how major infrastructure project promoters should engage with local communities. It emphasises early, honest, and ongoing dialogue, robust assessment of community wellbeing impacts, including mental health and the need for effective mitigation and support throughout all project phases, to ensure that local voices are heard and community wellbeing is safeguarded.
- 4.25 East Suffolk Council Healthy Environments Supplementary Planning Document. This SPD¹⁹ provides detailed guidance to support the implementation of Local Plan policies relating to health, wellbeing, green

¹⁵ [https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(16-05-2023\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(16-05-2023),%20The%20Cabinet)

¹⁶ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/suffolks-local-transport-plan-2025-2040>

¹⁷ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy>

¹⁸ <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

¹⁹ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf>

infrastructure, active travel, healthy homes, community facilities, and lifetime neighbourhoods.

- 4.26 The Suffolk Economic Strategy was published in December 2024 (see Appendix 10). The document identifies Suffolk as a national leader in Clean Energy, highlighting its key role in the UK's energy transition. The Strategy also outlines plans for maximising Suffolk's clean energy potential, including attracting additional investment in renewable energy projects, and enhancing training programmes to expand the skilled workforce in Suffolk.
- 4.27 The Suffolk & Essex Coast & Heaths Management Plan 2023-2028 has been produced in accordance with the Countryside and Rights of Way Act 2000. It seeks to conserve and enhance the special landscape (and seascape) characteristics of the National Landscape through the planning process, with impacts of major infrastructure development avoided, mitigated, or offset. The main landscape character types have been defined as: Sand dunes and shingle ridges, saltmarsh and intertidal flats, coastal levels, open coastal and wooded fens, valley meadowlands, estate sandlands and farmlands. It promotes and recognises the importance of sustainable recreation and tourism within the National Landscape and seeks to enhance the understanding of its historic and cultural assets. The Suffolk Heritage Coast is largely contained within the National Landscape and there are no specific statutory requirements or powers associated with the heritage coast definition.²⁰
- 4.28 The Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators document was published on 20 November 2016. It identifies the features that constitute the natural beauty and special qualities of the whole of the AONB. The document follows a rigorous criteria-based approach for establishing and identifying the special qualities of this nationally important landscape.²¹
- 4.29 Aldringham-cum-Thorpe are in the process of producing a neighbourhood plan, with the plan submitted to the Planning Inspectorate for examination which began 4th August 2025. This plan contains several policies relevant to the proposed development. Although it does not form part of the statutory Development Plan as it has not yet been adopted, reference will still be made to the plan in this LIR, and relevant extracts can be found in Appendix 9.

²⁰ See Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023-28, attached at Appendix 11.

²¹ See Suffolk Coast and Heaths AONB Natural Beauty and Special Qualities Indicators document, attached at Appendix 12.

Table 3: Summary of local impacts – Landscape and Visual					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative/ Neutral/ Positive	Required mitigation or compensation and how it should be secured (change/requirement/obligation)	Policy Context
3.1	Impact of surface infrastructure and construction activity on Landscape Character and Visual Amenity of (predominantly rural) areas within and surrounding the Order Limits, including on the SECHNL	C	Negative	Requirements governing design and landscape mitigation for construction activities, including a robust Landscape and Ecological Management Plan. Adequate conservation and enhancement of the SECHNL	NPS EN-1 section 5.10 / NPS EN-5 2.9.9, 2.9.10m 2.11.2, 2.11.3, 2.11.4, 2.11.5 / Green Future / NPPF / SCLP
3.2	Impact of surface infrastructure including the proposed bridge over the River Fromus, the Saxmundham converter station and Friston substation	O	Negative	Requirements governing landscape mitigation, compensation, and maintenance through robust management plans. Requirement ensuring good design of converter stations	NPS EN-1 section 5.10 / NPS EN-5 2.9.9, 2.9.10m 2.11.2, 2.11.3, 2.11.4, 2.11.5 / Green Future / NPPF / SCLP
3.3	Impact of decommissioning activities on the landscape and visual amenity of the surrounding areas	D	Negative	Requirement governing reinstatement of the site following decommissioning	NPS EN-1 section 5.10 / NPS EN-5 2.9.9, 2.9.10m 2.11.2, 2.11.3, 2.11.4, 2.11.5 / Green Future / NPPF / SCLP

Impacts by Issue

5 Landscape and Visual

Policy Context

National Policy

5.1 A Green Future: Our 25 Year Plan to Improve the Environment

“We will:

- a. Conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed.”

National Policy Statements

Overarching National Policy Statement for Energy EN-1

- 5.2 EN-1 includes in its definition of the Mitigation Hierarchy the element of compensation, in addition to avoidance, reduction and mitigation of harm to protect the environment and biodiversity
- 5.3 5.10.7 National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate, and proportionate to the type and scale of the development
- 5.4 5.10.26 Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, the electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.
- 5.5 5.10.27 Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.

- 5.6 5.10.28 Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista.
- 5.7 5.10.33 For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate, and proportionate to the type and scale of the development. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.
- 5.8 5.10.34 The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.

National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 5.9 The Council considers that it would be appropriate for the ExA to give significant weight to EN-5 in respect of this project, as the policy provides important clarification in relation to landscape and visual issues, in respect of appropriate and reasonable mitigation measures for both protected landscapes, and those landscapes outside them, as follows:
- 5.10 2.9.9 New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.
- 5.11 2.9.10 Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.
- 5.12 2.11.2 The Secretary of State should be satisfied that the development, as far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.
- 5.13 2.11.3 The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity network infrastructure, have been considered and evaluated appropriately.

- 5.14 2.11.4 In circumstances where it can be demonstrated that a mitigation measure and/or technological approach is appropriate and/or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.
- 5.15 2.11.5 Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding.

National Planning Policy Framework, December 2024

- 5.16 The National Planning Policy Framework sets out policies for conserving and enhancing the natural environment in paragraphs 187-191.
- 5.17 Para 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

Local Plan Policy

Suffolk Coastal Local Plan

- 5.18 Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects, states that ESC will take into consideration the nature, scale, extent, and potential impact of proposals for major energy infrastructure projects. The policy states that projects will need to mitigate their landscape and visual impacts.
- 5.19 Policy SCLP10.3: Environmental Quality, states that consideration will be given to the impacts of development proposals on light pollution, including with regard to the cumulative effects of development.
- 5.20 Policy SCLP10.4: Landscape Character, requires development to be informed by, and sympathetic to, the special qualities and features described in the Suffolk Coastal Landscape Character Assessment (2018) and Settlement Sensitivity Assessment (2018). The policy sets out an expectation that proposals demonstrate how they will protect and enhance a number of factors including the special qualities and features of an area, the visual relationship and environment around settlements and their landscape setting, distinctive landscape elements, seascapes, river valleys, and significant views. Development will not be permitted where it will have a significant adverse impact on sensitive landscapes. Conserving and

enhancing the landscape and scenic beauty of the National Landscape is identified as being of particular importance.

- 5.21 Policy SCLP11.1: Design Quality, notes the importance of locally distinctive and high-quality design that demonstrates an understanding of, and seeks to enhance, the key features of local character. The policy also states that the development proposals should retain and/or enhance existing landscaping and natural and semi-natural features on the site and use landscaping schemes to aid integration of the development into its surroundings.
- 5.22 Policy SCLP11.2: Residential Amenity, states that proposed developments should not cause an unacceptable loss of amenity for occupiers of developments in the vicinity. The policy makes reference to visual factors, such as privacy/overlooking, and outlook.
- 5.23 Policy SCLP11.8 – Parks and Gardens of Historic or Landscape Interest, identifies Designated and Non-Designated Heritage Assets within the area covered by the Suffolk Coastal Local Plan. This policy states that “East Suffolk Council will encourage the preservation and enhancement of these parks and gardens of historic interest and their surroundings,” and that development proposals within or affecting these parks and gardens must include appropriate landscape design and management in order to achieve a high level of design, mitigation, and enhancement.
- 5.24 Policy SCLP12.29: South Saxmundham Garden Neighbourhood, identifies The Layers as a Suitable Alternative Natural Greenspace (“SANG”). The proposed River Fromus bridge would have a significant adverse effect on this area.

Neighbourhood Plans

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 5.25 Policy ACT4: Mitigating the impacts of large-scale energy projects, states that any migratory or compensatory measures deemed necessary as a result of the impacts of major energy projects on the landscape, natural environment, historic environment or residential amenity of the parish should be provided directly where those impacts are most felt in the parish, or elsewhere in the parish where this is not practicable.
- 5.26 Policy ACT5: Landscape Character, states that “The visual scenic value and distinctive landscape character of the defined countryside within the parish will be protected from development which may result in significant adverse effects upon this character. In particular landscape features such as pine lines, areas of heathland, common and blocks of woodland which are synonymous with the Estate Sandlings and the Coastal Broads and Marshes landscape character types will be retained, restored and enhanced”, highlighting the particular importance of the public local views shown in

Figures 38 and 39 of the Aldringham-cum-Thorpe Submitted Neighbourhood Plan.

Saxmundham Neighbourhood Plan

- 5.27 Policy SAX1: General design principles, states that development proposals should reflect Saxmundham's local distinctiveness and character and seek to enhance its quality.
- 5.28 Policy SAX11: Non-designated Heritage Assets, identifies The Layers as a non-designated heritage asset. The proposed River Fromus bridge would have a significant adverse effect on this asset.
- 5.29 Policy SAX12: Gateways, views and the landscape setting of Saxmundham, states that "the visual scenic value of the landscape and countryside in the parish outside of the defined settlement boundary will be protected from development that may adversely affect this character". This policy also provides several important local views which should be taken into account, including the 'view from the B1121 looking across to Hurts Hall and St John's Church' and the 'view towards the town from the B1119 (Leiston Road)'.
- 5.30 The Saxmundham Neighbourhood Plan also identifies the view from the B1121 looking across to Hurts Hall and St John's Church (Views 1a and 1b), and the view from the high point of The Layers looking across the River Fromus to Hurts Hall (View 2), as important public views. The proposed River Fromus bridge would have a significant adverse effect on these views.

Saxmundham Draft Modified Neighbourhood Plan

- 5.31 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states "The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 5.32 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied."

Local Impact Assessment

Construction Phase Impacts

Positive

- 5.33 None identified.

Neutral

- 5.34 None identified.

Negative

- 5.35 The converter station proposals at Saxmundham would result in significant impacts on the existing landscape to the east and south of Saxmundham, including detrimental impacts on the settings of the Grade II listed Wood Farmhouse and Hill Farmhouse at the converter station site, and on the local landscape character and setting of the Grade II listed Hurts Hall and the Grade II* listed Church of St John the Baptist as a result of the proposed access through the Fromus valley, including an access road and a bridge across the River Fromus. Additional impacts are expected at Benhall Railway bridge, which would require some temporary or permanent improvement works, which would be expected to result in vegetation loss, residential amenity and adverse effects on the local landscape character and PRow network.
- 5.36 The cable corridor for the interconnector would comprise a swathe of between 63m (HVAC corridor only) up to 78m width (combined HVDC and HVAC corridors), which would be disturbed during the construction of underground cable sections of the route and would require to remain a permanent easement.
- 5.37 Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during construction on the following Landscape Character Areas:
- i. LCA B4 (Fromus Valley)
 - ii. LCA L1 (Heveningham and Knodishall Estate Claylands)
- 5.38 It is difficult to follow that the adverse effects on the SECHNL are judged as minor on all accounts, despite the very high value, susceptibility and hence sensitivity, and despite the long list of intrusive works that are listed.
- 5.39 Harm to any parts of the AONB needs to be considered harm to the AONB as a whole and to its statutory purpose. SCC considers further that the adverse effects on landscape quality, scenic quality, relative wildness and tranquillity, are significant beyond the DCO limits and are likely to affect a considerable part of the AONB.

Cable corridor

- 5.40 The cable corridor, with a standard working width of 63m (HVAC corridor only) or 78m (combined HVDC and HVAC corridors) [AS-093] is expected to result in considerable vegetation loss where vegetation would be lost, both between the converter station at Saxmundham and the substation Friston, and between Saxmundham and the landfall site at the coast, north of Aldeburgh. Although, it is welcome that no ancient and veteran trees require full removal.
- 5.41 SCC considers that trees that are removed, but cannot be replaced within the cable corridor, need to be replaced elsewhere (as close as possible to location where the tree loss occurred).

Landfall site

- 5.42 The proposed landfall site is located between Aldeburgh and Thorpeness, within the highly constrained Suffolk and Essex Coast & Heaths National Landscape (“SECHNL”) (formally known as “Suffolk Coast & Heaths Area of Outstanding Natural Beauty”) and the Suffolk Heritage Coast.
- 5.43 It is close to the Sandlings Special Protection Area and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential.
- 5.44 In terms of tourism, the site is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.
- 5.45 SCC disagrees with the Applicant that the adverse effects on landscape character will not be significant during construction. While the vegetated shingle may remain unaffected, the construction activities are expected to be highly detracting within the open coastal landscape.

Effects on designated and defined landscapes

- 5.46 SCC (landscape) considers that Table 2.1 of Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] does not provide a sufficient or adequate assessment for the SECHNL.
- 5.47 The Work Plans - Suffolk [APP-021] show a temporary construction compound will be placed where the cables make landfall within the SECHNL. Temporary work compounds are listed as Work No. 4 in the draft DCO [AS-087] which allows the promoter to carry out the following works:
- a) *site clearance, preparation, and establishment.*
 - b) *earthworks, soil stripping and storage, ground improvement.*
 - c) *car parking, hard standing, roadways and access roads (including construction site services and temporary bridges and/or culverts).*
 - d) *drainage works*
 - e) *office and staff welfare facilities.*

- f) utility service connections for electricity, communications and potable water and/or connection of power supply made from temporary generators.*
- g) utility service connection or on-site storage for later disposal of grey water and sanitation.*
- h) emergency electrical generator.*
- i) materials, tools and fuel storage and laydown areas.*
- j) assembly areas.*
- k) plant and equipment storage areas.*
- l) wheel cleaning facilities.*
- m) security cabin and fencing and gates.*
- n) construction and security lighting; and*
- o) construction waste management facilities.*

5.48 Given the fact that the DCO gives the Applicant the powers to carry out all of these works in relation to the landfall construction compound, each work should be reflected in the assessment on the SECHNL's natural beauty with the exception of any works prohibited by a control document for this compound. SCC does not consider that the extent of the works associated with the landfall construction compound is reflected in the Applicant's assessment of the project's effects on the SECHNL's natural beauty.

5.49 SCC questions the findings that the impacts on landscape quality of the affected parts of the SECHNL are small. The Applicant assesses the impacts on this natural beauty indicator in terms of displacement of 'acid grassland within the SECHNL, including at the landfall construction compound' ([APP-097], table 2.1). The presence of the landfall construction compound itself, not just its effect on acid grassland, should be considered within the assessment. The compound is likely to have substantial impacts on the landscape quality of the surrounding area within the SECHNL. For instance, it will increase the influence of human-caused incongruous elements, which is listed as an indicator of Landscape Quality in Appendix 12, through visual intrusion and increased human activity.

5.50 The compound is also likely to affect other factors of natural beauty such as Scenic Quality in terms of distinctive sense of place, visual interest in patterns of land cover and appeal to the senses. Relative Tranquillity and Relative Wildness are also likely to be affected by the works relating to the landfall construction compound.

5.51 There are other aspects of the works forming part of the project which could affect the SECHNL's natural beauty but are not mentioned in relation to every relevant natural beauty factor. These include storage bunds for soils, security boundary along the corridor and bellmouths at access points. Moreover, SCC

considers that these works, in addition to noise levels from HDD, soil displacement caused by the open cut trench and other works listed in Work No. 4, are likely to be far more striking and noticeable in terms of signalling human industrial activity in comparison to agricultural activity. Therefore, SCC does not consider it accurate for the Applicant to claim that the construction activities within the SECHNL are similar in effect to those undertaken on agricultural land. These considerations should be reflected in the Applicant's assessment.

- 5.52 Whilst the works within the SECHNL are temporary, elements will remain adversely affecting the SECHNL's natural beauty for several months or years during the construction phase and into the operational phase.
- 5.53 SCC (Landscape) considers that the impacts are not sufficiently quantified to allow a realistic understanding of the effects (very small loss of trees, removal of small sections of boundary features, displacement of small sections of acid grass land, remaining short sections of monitoring access routes and occasional vehicle movements).
- 5.54 Trees within the cable corridor will be irreversibly lost, as they cannot be replaced across the cables. Access roads remain in place during the operation and maintenance phases and are likely to include engineered bellmouths and require maintained visibility splays, thus permanently altering the local landscape character.
- 5.55 The Applicant further fails to acknowledge that the character of the SECHNL and its special qualities and natural beauty indicators are affected in an area that is particularly representative and highly frequented by various receptor groups, thereby affecting the understanding, interaction with and enjoyment of the statutory purposes of the SECHNL.
- 5.56 The assessment on the Natural Beauty of the SECHNL [APP-097] indicates that there are effects which go beyond Landscape and Visual. The assessment refers to the effects of construction traffic, drilling for the trenchless cable installation at landfall and an increase in human activity and machinery. This suggests that there will also be Noise and Vibration effects on the SECHNL. The Applicant's noise assessment figures ([AS-125]) appear to identify several residential receptors within the SECHNL assessed to experience substantial impacts during construction, with some receptors experiencing significant effects. SCC considers that the SECHNL should be assessed as a receptor for noise and vibration effects. Regarding the intra-project cumulative effects assessment [APP-059], SCC considers there to be potential for noise impacts on the SECHNL to combine with adverse Landscape and Visual effects already identified by the Applicant to potentially rise to the level of significance. This would particularly apply to Natural Beauty features such as Relative Tranquillity.

- 5.57 Given the elevated status of protection granted to designated landscapes by EN-1, SCC consider it necessary for the full extent of impacts on the SECHNL to be assessed to ensure appropriate measures of avoidance and mitigation are secured within the application. This point is also relevant to the statutory duty found in section 85 A1 of the Countryside and Rights of Way Act 2000 as the question of whether the Applicant has sought to further the purpose of conserving the natural beauty of the SECHNL must be informed by the impact the proposed development will have on the natural beauty of the SECHNL.
- 5.58 EN-1 requires appropriate, proportionate, and sufficient measures which seek to further the purposes of the designation of an affected protected landscape. The question of what is appropriate and proportionate is inherently linked to the extent of the effects on the designated landscape, meaning there is greater difficulty demonstrating compliance with the policy if the assessment is incomplete. As stated in the Planning Statement [AS-057], there is an area included in the Order Limits within the SECHNL in which the Applicant will provide 6 hectares of acid grassland enhancement to allow the section 85 duty to be discharged. This would likely satisfy the EN-1 requirements were the project's effects limited to the displacement of acid grassland. However, the project's effects also include those arising from various construction activities associated with HDD, HVDC cable laying, vegetation removal, and the landfall construction compound amongst others. In this section, SCC has suggested how these activities could adversely affect the natural beauty of the SECHNL in ways not considered in the Applicant's assessment [APP-097]. If adverse effects are found to go beyond the levels as currently assessed, SCC would encourage the ExA to consider whether further measures which seek to enhance the statutory purposes of the SECHNL are necessary to allow the duty to be discharged and to satisfy EN-1.

Potential adverse effects on landscape and visual mitigation measures of other projects

- 5.59 SCC considers that the significant loss in trees and hedgerows within the cable routes coincides or occurs in close succession to significant vegetation loss to other projects within the SECHNL and wider East Suffolk, such as for Sizewell C, resulting in significant inter-cumulative effects.
- 5.60 It is further important to note that the AC cable corridor route risks undermining the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N and EA2, specifically around Friston substation (Scenario 1).
- 5.61 While SCC accepts that in some cases mitigation of residual inter-cumulative effects may not be achievable, it considers that options should be fully explored. Where mitigation of significant cumulative effects is not available, as stated for cumulative effects with East Anglia ONE & TWO Offshore Windfarms (ID 5 and ID 6) and South Saxmundham Neighbourhood (ID 291),

compensation must be considered as the final element of the mitigation hierarchy.

Operational Phase Impacts

Positive

5.62 None identified.

Neutral

5.63 Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] predicts no effects during operation on the following Landscape Character Area and Seascape Character Type:

- LCA D4 (Thorpeness to Aldeburgh) – negligible adverse (non-significant) effects at Year 1, but no change at Year 15
- SCT 03 (Nearshore Waters) – no change at Year 1 or Year 15
- SCC (Landscape) does not agree with this (please see comments below, under *negative*.)

Negative

5.64 Surface infrastructure would remain highly visible within the landscape. This includes the converter station itself, but also the access road and the bridge across the River Fromus, and potentially the substation in Friston, if Scenario 2 applies.

5.65 Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during operation on the following Landscape Character Areas:

- LCA B4 (Fromus Valley) – assessed to be significant at Year 1 winter, but non-significant at Year 15 summer
- LCA L1 (Heveningham and Knodishall Estate Claylands)

5.66 SCC disagrees with the Applicant's judgement that at year 1 of Operation the majority of the HVDC corridor would be restored to former land use. While hedges are quicker and easier to reinstate than trees, they will visually be dominated by growing tubes and stakes. The loss, and permanent loss of tree within the cable corridor should not be glossed over. It stands to hope that by year 15 the hedges and most other habitat types will be reinstated, and adverse effects would become less pronounced. There is, however, concern that the treeless cable corridor remains legible in the landscape beyond year 15.

The residual effects at the landfall site and at joint bays would be expected to be minor, but still evident.

Converter Station site

- 5.67 The land to the north and east of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood²², as well as ponds and a small plantation typical of the Ancient Estate Claylands²³ landscape type, of which this area is part. The current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119.
- 5.68 There are several listed buildings within the vicinity of the converter station site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting.
- 5.69 Saxmundham Footpaths 5 and 6 cross the site and require diversion.
- 5.70 SCC (Landscape) considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.
- 5.71 The strip of land along of the B1119 currently included in the proposed DCO limits, does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, which also connect to other PRow in the area.

River Fromus Crossing

- 5.72 Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts and effects on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment.
- 5.73 It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape

²² <https://heritage.suffolk.gov.uk/Monument/MSF19469>

²³ <https://suffolklandscape.org.uk/landscapes/ancient-estate-claylands/>

as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.’

- 5.74 SCC (Landscape) also considers that the proposals will have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace (“SANG”) in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).
- 5.75 SCC (Landscape) welcomes the change in layout of the Fromus crossing to avoid irreplaceable veteran/ancient trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, from and of Hurts Hall, and of the Church of St John the Baptist. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. SCC (Landscape) is not at present persuaded, from the limited information so far provided on the design and appearance of the bridge, that such an outcome can be assured.
- 5.76 Table 3.1 of Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during construction, operation and maintenance, and decommissioning on SCLCA LCA B4 Fromus Valley.
- 5.77 Given that the proposed bridge and access route has been assessed to have long-term significant adverse effects if it was to be made permanent, SCC considers that this access route should be temporary only.

Decommissioning Phase Impacts

Positive

- 5.78 None identified.

Neutral

- 5.79 None identified.

Negative

- 5.80 Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during decommissioning on the following Landscape Character Areas:

- LCA B4 (Fromus Valley)
- LCA L1 (Heveningham and Knodishall Estate Claylands)

- 5.81 SCC considers that there would be potentially significant impacts upon the SECHNL and the Suffolk Heritage Coast, if the infrastructure is removed at decommissioning. The impacts and effects would be comparable with those during construction. The infrastructure demolition would represent an intrusive feature in the landscape during decommissioning.

Required Mitigation

Landscape and visual mitigation and compensation

- 5.82 The proposals are located in highly constrained landscapes and the application of Good Design principles as well as application of the full Mitigation Hierarchy (including compensation for adverse effects that cannot be mitigated) will be essential.
- 5.83 While the embedded mitigation is fundamental to make the proposed scheme acceptable in landscape terms, SCC (Landscape) considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate and, if necessary, compensate, landscape and visual impacts and effects.
- 5.84 The Council is disappointed that a considerable amount of land has been removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.
- 5.85 Suffolk County Council is concerned that, through minimising areas that are to be included within the DCO (removing most of the field south of the B1119), comprehensive landscape and visual mitigation, commensurate with the proposals, is being made more difficult, if not impossible, to deliver. Landscape enhancements in this location would not be remote from the site, and therefore SCC considers that compensation, at least to some degree, is possible and is worthwhile pursuing.

Good design

- 5.86 SCC considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be further developed. Although it is anticipated that work on the design of the converter station would continue post-decision, if the Secretary of State granted Development Consent, SCC (Landscape) is concerned about how little detail has been provided.

- 5.87 SCC welcomes Document 7.12.1 Design Principles – Suffolk [APP-366] and that a design champion has been assigned to the project.
- 5.88 SCC welcomes that the Applicant considers the Suffolk Coast & Heaths Area of Outstanding Natural Beauty - Guidance on the selection and use of colour in development and the Lighting Design Guide - Dedham Vale National Landscape and Coast and Heaths National Landscape useful.

Overarching Principles

- 5.89 Whilst SCC welcomes the production of Overarching Principles and the Project Level Design Principles, SCC notes that only the Key Design Principles from this document are secured in the draft DCO [AS-087] as part of Requirement 3. SCC questions by what mechanism the proposed development will be carried out in accordance with these principles whether as written or approved with limited variation post-consent. Therefore, it is not clear to SCC what the purpose of the production of these principles is if there is no requirement for the development to follow some form of them.
- 5.90 SCC (Landscape) welcomes the Overarching Design Principles, in particular OA.4, which indicates that the Mitigation Hierarchy is to be applied in full, including offsetting.

Project Level Design Principles

- 5.91 Of the Project Level Design Principles SCC (Landscape) particularly welcomes PE.3 anchoring the aim to increase green infrastructure opportunities and thereby to improve recreational links.
- 5.92 What appears to be missing among the project level design principles relating to people is a clear concept of Community engagement (this would need to be independent and go beyond PE.1).
- 5.93 SCC (Landscape) considers principle PL.1 (Minimising and rationalising land take) problematic as this compromises the delivery of recreational community benefits north of the proposed converter station.
- 5.94 SCC (Landscape) considers that it is essential to restore individual trees that are lost to the scheme within the related landscape and that this should be anchored into PL.2.
- 5.95 PL.6 should include that these infrastructure elements will be appropriately mitigated in landscape and visual term, through appropriate mitigative planting.
- 5.96 SCC (Landscape) welcomes V.4 which includes advance planting, where possible.

Converter Station Design Principles – Suffolk

- 5.97 SCC would welcome greater commitment by the Applicant in the 'Potential Associated Activities' column. Are these not activities that should happen?

- 5.98 SCC considers that the principles regarding the Public Space lack detail and commitment. It is noted that references to improving the PRow network have not been included. There is no clear intention nor commitment to provide additional permissive access, but rather a management of expectations (permissive access 'may well not be possible for operational reasons,' paragraph 3.2.16). Enhancements within the public realm are not included.
- 5.99 Principle CO.4 should probably include VP20, VP19 and VP5 as additional key views.
- 5.100 SCC is concerned that the principles regarding Public Space have the potential to curtail public amenity and mitigative planting. Principle PS.1 does not provide reassurance that the visual amenity of the local PRow will be safeguarded, and the mitigative planting is subject to security measures, which may limit its ability to fulfil its screening function. SCC supports security measures but considers that these need to be integrated well with the overall landscape design and as discreet as possible.
- 5.101 SCC considers that principle R.2 and shaping the landform around the converter station in a credible way will be essential to integrate the converter station into its surroundings. SCC welcomes the ambition to share cut and fill across a combined masterplan with other projects.
- 5.102 SCC welcomes principle R.3.

Substation Design Principle Friston

- 5.103 The design principles for Friston substation are limited, and particularly if they are intended to be applied in Scenario 2, they appear incomplete and insufficient.
- 5.104 SCC (Landscape) further considers that the mitigation proposals indicated in Document [AS-063] for Scenario 2 is currently insufficient and would require further detail to be developed. As currently shown, it is considered that the mitigation would not be reduce adverse landscape and visual effects to the same extent as the consented SPR scheme, which serve as a precedent for the site.

Comments on application documents

- 5.105 In what follows, SCC (Landscape) provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Document 6.3.2.1A: Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]

- 5.106 The photomontage methodology (including anticipated growth rates) is acceptable.
- 5.107 The assessment methodology could be more detailed, in particular regarding the derivation of sensitivity and magnitude of impact.
- 5.108 SCC agrees with the Applicant's approach that any moderate or major effects should be considered as significant effects. SCC further considers that moderate-minor effects would be the effects that require greater scrutiny to determine whether they would need to be considered significant or not.
- 5.109 SCC is of the view that, while the focus needs to be on significant effects, effects below the significance threshold should not be ignored. SCC considers that effects below the threshold can, in accumulation, become significant.
- 5.110 SCC notes that during pre-submission consultations, the Applicant did not take on board requests for additional viewpoints made by SCC, in particular around the converter station site and from The Layers. An additional viewpoint should be provided from The Layers, along footpath 20, from a location sufficiently elevated to convey the effects of the converter station, the access route, and the Fromus crossing within the setting of Hurts Hall and St John the Baptist Church. This should include the worst-case scenario of a 6m clearance height being required for the Fromus crossing bridge (as well as the scenario for 4m clearance height). SCC considers that such an additional viewpoint would provide detail not fully conveyed in viewpoints 2 and 20, as they do not include the church, and the crossing location may be more obscured. The additional viewpoint would also help to illustrate the sequential nature of the effects experienced by footpath users at The Layers.
- 5.111 While being aware that the findings of the assessment depend on the foundation of the methodology, and while not fully aligned with the Applicant's approach, SCC considers that during the examination period the focus should be on further shaping the design and mitigation of adverse effects of the scheme and securing good outcomes for Suffolk.

Document 6.2.2.1: Environmental Statement Part 2 Chapter 1 Landscape and Visual [APP-048]

- 5.112 SCC does not agree with the Applicant that the preferred access to the Saxmundham converter station site through the Fromus valley can be considered an embedded measure to reduce or avoid landscape and visual effects resulting from the scheme. SCC considers that alternative approaches, which would make use of other emerging infrastructure routes have not been fully explored by the Applicant.

- 5.113 Since there is no commitment that trees within the cable corridor, which require removal to enable the scheme, will be replaced (at a ratio of 3:1) beyond the cable corridor, yet as close as possible, SCC does not consider that the proposals offer full reinstatement (first bullet point on page 77/80).
- 5.114 While SCC acknowledges that the embedded measures have reduced or avoided some impacts (such as on veteran trees), SCC considers it unacceptable that no mitigation is proposed beyond these embedded measures, despite Table 1.10, Table 1.11, and Table 1.12 identifying significant effects.
- 5.115 SCC considers that the Applicant should explore whether mitigative planting can further reduce the identified effects. Where this is not possible, compensation measures need to be considered.

Document 6.2.2.12: Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]

- 5.116 SCC (Landscape) disagrees with the Applicant's assessment of intra-cumulative effects on designated/non-designated sites. As the Sandlings SPA, Leiston-Aldeburgh SSSI and RSPB North Warren Reserve are located within the SECHNL, SCC considers that there are intra-cumulative effects on the SECHNL.
- 5.117 SCC (Landscape) does not follow how the Applicant can base the assessment of effects of the scheme on visual amenity for recreational receptors and communities on two viewpoints (VP9 and VP11), which would experience, according to the assessment, minor adverse effects, and ignore those with moderate or major adverse effects during construction (such as VP1, 2,3,4,5,6 (Scenario 2), 1519,20, 22 and 23 (Scenario 2)). It is also difficult to follow, how this, in combination with noise disturbance, rights of way connectivity impacts, etc. does not add up to something greater than its parts, making these impacts and effects significant for recreational receptors and communities.
- 5.118 The Applicant does in its summary acknowledge that in-combination effects, which by themselves are not significant, can become significant in combination. Such potentially significant intra-cumulative effects were identified for residential receptors for the Friston Scenario 2 (but not for residential receptors at Saxmundham, Benhall and Strenfield), for transport and transport users, for users of PRow. Yet, for none of these has any mitigation been confirmed thus far. SCC would urge the Applicant to consider how these potentially significant intra-cumulative effects can be mitigated and share the envisaged measures at the earliest convenience. If the Applicant considers there to be no practicable mitigation measures, then compensatory measures such as enhancement of green infrastructure should be considered following the mitigation hierarchy.

Document 6.2.2.13: Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]

- 5.119 SCC welcomes the Sequential Cumulative Visual Assessment provided in Table 13.36.
- 5.120 However, SCC disagrees with the Applicant that adverse visual effects can be considered less severe, because they only affect a short stretch of a given route. SCC considers that the Applicant does not sufficiently take into account the perception of the changes, and the perceived scale of the changes experienced by various receptor groups. It seems that the Applicant has not considered that receptors move through time and space and will remember the accumulation of change they have experienced within the landscape. SCC considers that this could affect even the perception of areas and locations, that, in themselves, do not experience any effects at all.

Document 6.10: Arboricultural Impact Assessment Part 1 of 2 [APP-294]

- 5.121 SCC welcomes the Arboricultural Impact Assessment (“AIA”) and the Applicant’s commitment that no veteran or ancient trees are to be removed (para. 6.2.6). However, there remains concern with regards to the proximity of some of these trees to proposed works and the requirements for incursions into Root Protection Areas (Table 6.4 Veteran and Ancient Tree RPA Incursions).
- 5.122 Appendix C Tree Survey Schedule Suffolk Onshore Scheme provides very helpful information. However, it would have been useful, if it could have been indicated in this table whether any given hedgerow was important under the 1997 Hedgerow Regulations.
- 5.123 The extent of required pruning has not yet been determined. SCC would also ask that it is clearly defined, what pruning entails.

Document 6.10: Arboricultural Impact Assessment Part 2 of 2 [APP-295]

- 5.124 SCC welcomes the Tree Protection Plan but considers that the line-type for the tree protection fencing is difficult to read and to differentiate from the line-type for the Root Protection Area. SCC also considers that additional areas may require protection. It is not clear whether the DCO boundaries will be fenced and thereby are intended to supplement Tree Protection Fencing.
- 5.125 Appendix G Outline Tree Protection Measures: SCC (Landscape) welcomes the default specification for protective barrier (Appendix Plate G.1) and considers that the alternative of hi-visibility barrier tape fencing secured with timber stakes (Appendix Plate G.2) will need to be justified for each location it is proposed for, as it would not withstand accidental incursions by larger vehicles and machinery.

Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans
[APP-036]

- 5.126 SCC notes that the key to this plan only refers to Important Hedgerows (Hedgerow Regulation 1997), rather than all hedgerows. SCC would ask for clarification why ‘other’ hedges are not included, as it is expected that they would have been surveyed to identify those hedges that are important under the regulations. It appears that non-important hedges have been depicted on the plan but not mentioned in the key. While Important Hedgerow may require a different approach (such as minimising the working corridor or temporary trans-planting), all hedges affected need to be recorded and their loss appropriately mitigated or compensated.
- 5.127 SCC further notes that the schedules for the hedgerows and information on the lengths likely to be lost are not readily available. There are hedges listed within the Tree Survey Table (Appendix C [APP-294]), but there is no differentiation between important and non-important hedgerows and no information on overall length. SCC had provided guidance with regards to recording hedgerows affected by the scheme at Statutory Consultation.

Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk
[AS-059]

- 5.128 SCC (Landscape) welcomes the principle of avoiding features of landscape and ecological value, and that it was possibly to avoid the loss of any veteran or ancient tree within the Suffolk Onshore Scheme. (Section 3.2)
- 5.129 SCC(Landscape) is, however, concerned about the wording of some of the commitments included in the OCoCP and REAC:
- 5.130 GG02: SCC considers that post consent there will be the need of a detailed overall LEMP prior to the Stage LEMPs. SCC (Landscape) considers that it needs to be made clearer that the contactor will need to comply with the agreed Stages Plans rather than with the Outline Planes approved at DCO consent, as the latter are produced to a Rochdale envelope and require refining (reducing impacts further where possible).
- 5.131 GG04: The group of specialists the ECoW can call upon should include landscape architects.
- 5.132 GG06: Please clarify the alternatives for aerial vs photographic footage. SCC considers that aerial photos of hedgerow will not provide sufficient information. SCC (Landscape) considers that the pre-condition survey should be made available to the relevant discharging authority and consultees, at submission of stage plans.
- 5.133 GG07: SCC (Landscape) considers that the wording of this commitment is so ambiguous that it becomes meaningless. It would be helpful, if the Applicant

were to clarify what other provisions of the DCO might be referred to here, and what ‘similar style’ means, with regards to hedges, fences, and walls.

- 5.134 GG08: SCC (Landscape) welcomes this commitment, but considers that the protective fencing should be in accordance with BS5837: 2012 Trees in Relation to Design, Demolition, and Construction
- 5.135 GG19: This commitment alone is insufficient to deal with store soil. It also does not relate to landscape features, will need buffer distances (i.e. no soils or other material storage within the RPA of trees and hedgerows).
- 5.136 GG21: SCC (Landscape) recommends the use of warmer light, which can produce the same illumination levels.
- 5.137 LV01: This is insufficient. Any trees that need to be removed to enable the scheme will need to be replaced at a ratio of 3:1. If replacement is not possible at the same location, due to planting restrictions over the cables, replacement will need to be included elsewhere within the DCO or outside as compensatory planting.
- 5.138 LV02: While SCC (Landscape) welcomes the commitment to protect trees in accordance with BS 5837:2012, the wording that follows for this commitment is unacceptable. The relevant working width needs to be adjusted as far as possible to work around the RPAs of trees within and without the DCO limits.
- 5.139 LV05/LV06: Soils also need to be documented and should be stored replaced as close to the location of origin as possible.
- 5.140 A03: works within 5m of any part of a retained tree should only ‘occur’, if it cannot be avoided; this should be clarified here.
- 5.141 A04: the 5m distance is acceptable if it is in addition to RPAs and AW buffer zone (of no less than 15m).
- 5.142 A05: SCC (Landscape) welcomes the retention of all veteran and ancient trees within and adjacent to the DCO limits.
- 5.143 A06: This is acceptable provided that AMS and TPP are also agreed with the relevant local authorities.

Tree Works

- 5.144 SCC (Landscape) welcomes the commitments made in Section 3.5. However, it needs to be made clearer that the Applicant will endeavour to further reduce removal of trees at detailed design stage, post DCO consent.

Landscape and Ecological Strategy

- 5.145 SCC (Landscape) welcomes many of the elements of the proposed landscape strategy. There remain concerns, however, with regards to the extent of the recreational access improvement around the converter station site in Saxmundham and with regards to the permanency of the crossing and access route through the Fromus valley.

Landscape and Ecological Proposals

- 5.146 There is concern with regards to the effects of the proposed scheme on the consented outline landscape mitigation for the substations for SPR EA1 and EA 2 at Friston.
- 5.147 From the information available it is not clear if and how the proposed scheme would fit in with, compromise or undo mitigation measures implemented through the SPR proposals. The conclusion drawn in paragraph 4.2.20 of Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093] that the landscaping works describe in paragraph 4.2.18 would not be required if the consented substations were built (Scenario 1), may be correct; however, other landscaping works would likely be required for any of the previous mitigation planting that may have been disrupted or undone and to integrated the additional infrastructure required by the proposed scheme with the other consented schemes at Friston.
- 5.148 SCC (Landscape) is currently concerned that if the substation is built as part of the proposed scheme, the outlined proposed landscaping works of paragraph 4.2.18 may not be sufficient. Unfortunately, further comment by SCC has to be reserved until the landscape proposals, both for Friston and for Saxmundham are submitted as separate documents, as they appear to be such large files that they cannot be successfully viewed, but cause the document to freeze.

Grassland Reinstatement

- 5.149 SCC (Landscape) welcomes that soil from grassland field margins will be kept separately from that in the arable areas, which will enable the seed bank topsoil to be restored following works.

Hedgerow Reinstatement

- 5.150 Paragraph 4.3.1 refers to temporary loss of hedgerows but omits mentioning hedgerows that might be lost to temporary access points.
- 5.151 SCC welcomes that it will be attempted to temporarily translocate hedgerow, especially Important Hedgerows to replace them into their original location upon completion of construction (paragraph 4.3.20).
- 5.152 SCC (Landscape) would however recommend smaller sizes, such as 60-90cm for hedging plants and feathered whips for tree replacement. The use of small standards should be reserved for key location or where agreed with landowners, as larger tree will require increased aftercare, such as regular watering, and often prove more difficult to establish than their younger counterparts.

- 5.153 The suggested species list is broadly acceptable but appears to be limited. Additional tree species should be included for hedgerows beyond the cable corridor (see further below in the oLEMP for new planting).
- 5.154 SCC considers that any tree from a young mature age onwards, that is lost to the scheme will require replacement planting of three new trees. This needs to be added to the catalogue of reinstatement measures.

Acid grassland reinstatement, restoration, and enhancement

- 5.155 It appears that with regards to the reinstatement of acid grassland which needs to be stripped during construction, the Applicant's approach is to replace the soils and trust that the seedbank within the soils and windblown seeds will reinstate the acid grassland in approximately two years.
- 5.156 Parallel to this, the Applicant proposes advance acid grassland creation (6ha) within the National Landscape. While the objectives are clear, no detail is given which measures will be employed to these.
- 5.157 Provided the created acid grassland remains in situ in addition to the reinstated acid grassland, this could be considered to contribute to the discharge of the Duty under Section 85 A1 of the Countryside and Rights of Way Act 2000. SCC has stated its reservations over the sufficiency of the proposed measures to allow the duty to be discharged earlier in this chapter.

Section 6.2 Management Periods

- 5.158 SCC considers that five years of aftercare may be considered sufficient for reinstatement of some types of grassland and hedges, but not for tree and woodland planting. SCC advocates an adaptive or dynamic aftercare regime, which is based on five years' worth of growth and establishment rather than five calendar years and welcomes Section 7.3 Adaptive Management Monitoring. SCC would welcome the opportunity to work with the Applicant to develop a suitable landscape aftercare supervision structure (see paragraph 7.3.3).

Section 6.4 Implementation of Native Planting (General)

- 5.159 SCC welcomes the commitment that planting will take place in the first available planting season following consent being granted, ideally during November and December for bare root stock, to reduce losses incurred during recent dry springs (paragraph 6.4.1). SCC assumes that consent in this context refers to the discharge of requirements for the relevant stage.
- 5.160 If strimmers are to be used around new plants, the standard biodegradable tree or shrub guards is unlikely to provide adequate protection. Strimmer guards would be required. SCC welcomes the rationalisation of guards used in larger planting areas and supports the use of fencing as this has resulted in good outcomes elsewhere in East Suffolk. However, the fencing needs to be rabbit *and* deer proof.

- 5.161 It is not clear, why hedgerow need to be maintained at a height of 2.5-3.5m.

Appendix A

- 5.162 SCC welcomes the cross- sections provided in Figure 2 of Appendix A of the oLEMP [AS-059] regarding the diverted PRow. However, It would have been useful, if there had been more measurements included, as the assumption that the site is entirely flat does also not reflect the actual site. With regards to the proposed 2m wide path within species rich neutral grassland, through native woodland (Section D-D), SCC considers that this is inadequate and not fit for purpose. The grassland corridor is approximately an estimated 5.6m wide. There is a realistic chance that the shrub layer at the woodland edges would encroach from both sides and fill the entire width of the corridor. Certainly, the canopy of the maturing trees would close over the path. A more realistic starting point for a new PRow corridor would be a corridor with a width of 20m (which equates to over half the native woodland shown). SCC considers that these proposals need to be reconsidered by the Applicant.

- 5.163 Saxmundham Section F-F fails to show the converter station.

Draft Development Consent Order (“dDCO”) [AS087]

- 5.164 With regards to Article 52, part (3) (b) SCC queries, why the duty in section 206(1) of the 1990 Act (replacement of trees) should not apply. SCC considers that suitable arrangement should be made by the Applicant to replace each tree that is lost at a ratio of three for one, and that suitable locations for these replacement tree must be found.
- 5.165 Schedule 3 Requirements, Retention and protection of existing trees and hedgerows, (2): SCC (Landscape) considers that this should also include Tree Protection Plans, that clearly identify the location and type of tree protection. SCC (Landscape) considers that this is required to enable an auditable system of compliance.
- 5.166 Article 52 of the draft DCO aims to suspend the Hedgerow Regulations 1997 within the DCO limits. This requires a Schedule to be included in the DCO that accurately lists the important hedgerows that are to be removed or managed, with reference where these can be found on relevant plans (see for example Schedule 11 in the DCO for EA1N²⁴)
- 5.167 There should be detailed design parameters included in the DCO to minimise impacts on tree and hedgerows such as information of the reduced working width, where important hedgerows are crossed.

²⁴ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-009802-EA1N%20-%20DCO%20-%20Registration%20Version.pdf>

Document 7.5.3: Outline Onshore Construction Environmental Management Plan (“CEMP”) [AS-127]

- 5.168 The Toolbox talks (paragraph 3.3.6) should list tree and hedgerow protection, as this is not automatically included in environmental measures.
- 5.169 Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] and document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]
- 5.170 SCC (Landscape) has concerns with the following measures presented in the REAC and CoCP (in addition to those discussed together with the oLEMP):
- 5.171 LV003: SCC considers that the five-year aftercare programme needs to be outcome focused, i.e. the plants need to have established and show several years’ worth of growth (adaptive aftercare).
- 5.172 TT01 Should also refer to environmental receptors such as trees and hedgerows
- 5.173 TT06: SCC would ask the Applicant to show that adverse impacts on vegetation resulting from highway improvements are appropriately considered, mitigated or, if required, compensated for.
- 5.174 SCC welcomes these reassurances A07, A08, A09, A10, A15, A16, A17.

Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS-008]

- 5.175 SCC (landscape welcomes that vegetation clearance is one of the factors considered in the design and placement of accesses and for routeing construction traffic.
- 5.176 However, SCC (Landscape) considers that so far, the vegetation loss has not been fully minimised. Looking at Application Document 2.13.1 Design and Layout Drawings – Suffolk [APP-037], for example at Access S-BM07 (S-AP-12) off the B1121, the access is located between two road side trees, both of which are shown in Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans [APP-036] as to be removed and considerable lengths of important hedgerows are shown as to be managed (which is assumed to mean coppiced), although this is not apparent from the visibility shown on the General arrangement and visibility splays picture (THE NATIONAL GRID (SEA LINK) ORDER PINS APPLICATION NUMBER: EN020026 DESIGN AND LAYOUT PLANS - SUFFOLK: INDICATIVE BELLMOUTH ACCESS ARRANGEMENT S-BM07 (S-AP-12) REGULATION 5(2)(o) SHEET 1 OF 1 [APP-037]).
- 5.177 The two trees to be removed are T635S* and T631S*, the hedgerow to be managed is identified as H641S*. (6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]).

- 5.178 Tree 631S* is shown as Category A tree on the Tree Constraints Plan, Sheet 3 [APP-294]. This tree could potentially be retained if the access was moved further north-west along the B1121, so that only one tree (T635S*, Category B) would need to be removed.
- 5.179 This is only one example and SCC(Landscape) would welcome the opportunity to work with the Applicant and SCC (Highways) colleagues to further minimise vegetation loss around accesses, including through temporary traffic management measures.
- 5.180 SCC (Landscape) welcomes the details provided with the submission documents but considers that the access designs can only be taken as preliminary and should not be fixed as part of approved DCO documents.

Table 4: Summary of local impacts – Ecology and Biodiversity					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative / Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
4.1	Impact on ecological features (designated sites, protected and priority species and habitats).	C / O / D	Negative	Robust mitigation measures to minimise adverse effects and reinstate vegetation secured in appropriate control documents such as the OLEMP	NPS EN-1 section 5.4 / Green Future / NPPF / SCLP 10.1, 10.3
4.2	Impact of habitat enhancement	O	Positive	Commitment to enhancement secured by the DCO. Adequate maintenance and monitoring to ensure long-term benefits are secured	NPS EN-1 section 5.4 / Green Future / NPPF / SCLP 10.1, 10.3

6 Ecology and Biodiversity

- 6.1 Whilst SCC details certain impacts on Ecology and Biodiversity in this chapter, statutory duties for local authorities on Ecology and Biodiversity matters lie at the District level.

Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

- 6.2 “Actions we will take include:

Making sure that existing requirements for net gain for biodiversity in national planning policy are strengthened, including consulting on whether they should be mandated alongside any exemptions that may be necessary;”

National Policy Statements

Overarching Policy Statement for Energy EN-1

Mitigation

- 6.3 5.4.35 Applicants should include appropriate avoidance, mitigation, compensation, and enhancement measures as an integral part of the proposed development. In particular, the Applicant should demonstrate that:
- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works.
 - the timing of construction has been planned to avoid or limit disturbance
 - during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements.
 - habitats will, where practicable, be restored after construction works have finished.
 - opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised.
 - mitigations required as a result of legal protection of habitats and species will be complied with.
- 6.4 5.4.44 The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered

into, in order to ensure that any mitigation or BNG measures, if offered, are delivered and maintained. Any habitat creation enhancement delivered including linkages with existing habitats for compensation or BNG should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.

- 6.5 5.4.45 The Secretary of State will need to take account of what mitigation measures may have been agreed between the Applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.”

National Planning Policy

Planning Policy Framework, December 2024

- 6.6 “Para 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”
- 6.7 “Para 193. When determining planning applications, local planning authorities should apply the following principles:
- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused,

unless there are wholly exceptional reasons²⁵ and a suitable compensation strategy exists and

- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

Local Plan Policy

Suffolk Coastal Local Plan

- 6.8 Policy SCLP10.1: Biodiversity and Geodiversity, states that developments should maintain, restore or enhance the existing green infrastructure network and positively contribute to biodiversity and/or geodiversity by creating new habitats and green infrastructure, or improving the linkages between habitats.” The policy highlights the importance of developments following the Mitigation Hierarchy, states that proposals that may impact an SPA or Special Area for Conservation must be supported by a Habitats Regulation Assessment and notes the need for ecological surveys to be undertaken if the presence of protected UK or Suffolk Priority species or habitats is suspected.
- 6.9 Policy SCLP10.3: Environmental Quality, states that development proposals should protect the quality of the environment, minimise pollution, and seek improvements to air quality, water quality, light pollution, and noise pollution.

Neighbourhood Plans

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 6.10 Policy ACT6: Biodiversity, states that “all development proposals should avoid the loss of, or substantial harm to, biodiversity habitats” and adhere to the Mitigation Hierarchy in the event of loss or harm to biodiversity. The policy also states the need for BNG to be in line with national policy, and a minimum of 10%.

Saxmundham Neighbourhood Plan

- 6.11 Policy SAX13: Protection and enhancement of natural assets, states that proposals should “retain existing features of biodiversity value”, “provide a minimum of 10 per cent net gain in biodiversity”, and “conform to the mitigation hierarchy”.

Saxmundham Draft Modified Neighbourhood Plan

- 6.12 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states “The impacts on the Neighbourhood Area of major energy

²⁵ For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.

- 6.13 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied.”

Local Impact Assessment

Construction Phase Impacts

Positive

- 6.14 None identified.

Neutral

- 6.15 None identified.

Negative

- 6.16 There would be material impacts upon ecological features (designated sites, protected and priority species and habitats). This would include a swathe up to 78 m wide that would be disturbed due to the construction of underground cable sections of the route. Surface infrastructure construction would represent an intrusive feature that would impact upon ecology during construction.
- 6.17 There are concerns about the potential impacts on the Haven Local Nature Reserve and the Leiston-Aldeburgh SSSI at the landfall site and these potential impacts should be assessed. If no impacts are anticipated, the Applicant should justify this in the Environmental Statement.
- 6.18 There are also concerns about the impacts on ecological features of the proposed works in and around the Benhall Railway Bridge. This site has high potential to be a bat migration corridor as the bridge is located along a well-vegetated linear corridor with strong links to the wider habitats in the area. Surveys for bat activity along the railway line should be undertaken and an assessment of potential roost features within the bridge should also be undertaken if the works will impact the bridge. Surveys for badgers and breeding birds to assess the potential impacts of the proposed works on the bridge and the surrounding habitats on these species. This will also help steer any mitigation/licencing measures that may be required.

Operational Phase Impacts

Positive

- 6.19 Ecological enhancements designed to achieve Biodiversity Net Gain (BNG) and other Natural Capital benefits would be in place and would over the operational life of the development increasingly enrich the area. This is a requirement included in the Ofgem RIIO- 2 determination.

Neutral

- 6.20 None identified.

Negative

- 6.21 There would be material impacts upon ecological features (designated sites, protected and priority species and habitats).

Decommissioning Phase Impacts

Positive

6.22 None identified.

Neutral

6.23 None identified.

Negative

6.24 There would be material impacts upon ecology. This would include parts of the swathe up to 78 m wide that would be disturbed due to the removal of underground cable sections of the route. Surface demolition would represent an intrusive feature that would impact ecology during decommissioning.

6.25 The potential impacts of the decommissioning works on the vegetated shingle habitat at the landfall site should be assessed. This site is both a National and Suffolk Priority Habitat as well as being a Local Nature Reserve (LNR) and a Site of Special Scientific Interest (SSSI). Avoidance measures should be drawn up if works will impact this area. If no impacts are anticipated, the Applicant should justify this reasoning in the Environmental Statement.

Required Mitigation

6.26 The proposed landfall site and cable route is close to Suffolk Shingle Beaches County Wildlife Site, the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI and The Haven Local Nature Reserve.

6.27 The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which supports a variety of bird species, such as skylark, yellowhammer, bullfinch, woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna.

6.28 In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant.

6.29 The Council welcomes the appointment of an Ecological Clerk of Works (“ECoW”) and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group.

6.30 The Council is generally content with the Applicant’s suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.

6.31 The Ecological Survey Reports appear to be of a good standard and consistent with CIEEM Guidelines.

- 6.32 SCC requests that all survey data is sent to Suffolk Biodiversity Information Service.
- 6.33 The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.
- 6.34 The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.
- 6.35 The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.
- 6.36 The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.
- 6.37 The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.
- 6.38 The Council is generally content with the Applicant's suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.
- 6.39 The Ecological Survey Reports appear to be of a good standard and consistent with CIEEM Guidelines.
- 6.40 SCC requests that all survey data is sent to Suffolk Biodiversity Information Service²⁶.
- 6.41 The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.
- 6.42 The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.

²⁶ <https://www.suffolkbis.org.uk/>

- 6.43 The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.
- 6.44 The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.
- 6.45 The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.

Comments on application documents

- 6.46 In what follows, SCC provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Document 6.1: Environmental Statement Non-Technical Summary [AS-016]

- 6.47 Paragraph 1.7.1: SCC welcomes the Applicant's commitment to 10% Biodiversity Net Gain ("BNG")
- 6.48 Paragraph 3.5.5: SCC questions whether or not solar panels and/or green roofs are being considered for the various buildings (including substation and converter station) and would appreciate justification if not. At the least, permanent car parks should have solar panels above the parking spaces (as in, e.g., France).
- 6.49 Paragraph 3.5.17: SCC notes that the cable corridor width is 78 metres in Suffolk but only 40 metres wide in Kent. SCC would appreciate an explanation from the Applicant on this discrepancy of almost 100% between Suffolk and Kent. SCC would prefer the cable corridor to be as narrow as possible.
- 6.50 Paragraph 5.2.2: The suite of ecological surveys appear to be acceptable, but there is no mention of Deer. SCC considers it would be useful to understand what size populations of Deer are in (or move through) the area, to assist in the design of Deer management measures for the protection of planting schemes.
- 6.51 Paragraph 5.2.13: There is a report of one possible Dormouse nest but no other signs. SCC welcomes the precautionary approach for this species. Regarding Badger, this species has greatly increased in numbers and range in recent years. Unfortunately, their main predators are vehicles and incidents of

Badgers being hit and either killed or injured are very prevalent. SCC would appreciate information regarding the measures the Applicant intends to implement to increase Badger numbers and deal with the inevitable further road casualties.

- 6.52 Paragraph 5.2.17: SCC appreciates the Applicant's recognition of the time required for planting to mature and welcomes the Applicant's acknowledgement that this may take time (especially bearing in mind the way that the seasons are much less reliable in terms of, e.g., rainfall, than in the past).

Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]

- 6.53 Paragraph 2.7.31: In relation to the Applicant's reference to the possible part-built Dormouse nest, SCC considers that any encounters with Dormouse during this project would be a noteworthy event. SCC welcomes the Applicant's precautionary approach in relation to Dormouse but notes that this approach should include appropriate surveys around the possible part-built Dormouse nest to ensure the presence of Dormice is fully understood and mitigated appropriately.
- 6.54 Paragraph 2.8: SCC welcomes the appointment of an ECoW and considers that this is a critical role to deliver the biodiversity mitigation, compensation, and enhancement (including BNG).
- 6.55 Paragraph 2.2.28: List of Priority Habitats included in Suffolk Biodiversity Action Plan should include vegetated shingle, which is located at the landfall site between Aldeburgh and Thorpeness. This habitat is also a UK Priority Habitat.
- 6.56 Paragraph 2.9.42: SCC would anticipate that installation and removal of the noise fences would be done in consultation with the ECoW and, depending on the time of year, possibly under ECoW supervision.
- 6.57 Paragraph 2.9.59: SCC acknowledges that moderate adverse impacts on hedgerows are anticipated. SCC consider it essential for mitigation ideas to retain connectivity anxious to see that these are put in place and monitored.
- 6.58 Paragraph 2.9.73: Bullfinch (Amber listed and a Priority Species for Suffolk) should be listed as a species that would use the arable land affected by the development
- 6.59 Paragraph 2.9.106: SCC welcomes the Applicant's proposal to close hedgerow gaps overnight with hurdles or similar. SCC would expect the Applicant to put in place a system of monitoring (for example, the ECoW) to ensure that these measures are fulfilling their intended function.

- 6.60 Paragraph 2.9.112: SCC welcomes the Applicant's proposal to use cowlings and similar to avoid light-spill. Again, SCC considers this would be another very useful function that might be offered by the ECoW.

Document 6.3.2.2.B: Environmental Statement Appendix 2.2B Suffolk Wintering Bird Report [PDA-025]

- 6.61 At Annex 2.B.2, SCC notes that the Desk Study Summaries give data for Kent rather than Suffolk. This should be rectified.
- 6.62 Paragraph 1.3.21 states the last overwintering survey was winter 2023/2024. These surveys should be updated to give the most accurate picture of the number and variety of species using the habitats potentially affected by operations at the landfall site (in particular RSPB North Warren site).
- 6.63 Paragraph 1.3.24 states the surveys were targeted on species associated with the SPA/SAC/RAMSAR sites within the ZOI. As the cable route will also impact terrestrial habitats, any updated surveys should include Fieldfare (Red Listed) and Redwing, which both have been recorded overwintering in East Suffolk.

Document 6.3.2.2.C: Environmental Statement Appendix 2.2C Suffolk Breeding Bird Report

- 6.64 Paragraph 1.3.13 - Field Survey Method states the last surveys were undertaken in 2024. These surveys should be updated in 2026 to reflect if any changes have occurred to the diversity of species and number of birds recorded within the landfall and cable corridor route.
- 6.65 Results section – no mention of numbers of Bullfinch recorded in the survey results. As these are Amber listed and a Suffolk Priority Species and should be included in any future surveys.
- 6.66 Paragraph 2.9.73 - the arable land to be lost to the development will also be of value to overwintering Starlings (Red listed species). This should be referred to in future publications.

Document 7.5.3: Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]

- 6.67 Paragraph 2.4.5: It is suggested that protected species fencing might only be checked intermittently but, we believe, that such fencing must be checked daily by the ECoW (or a person suitably trained and instructed by the ECoW).
- 6.68 Paragraph 2.4.8: Winter lighting should be installed under the supervision of the ECoW to ensure that no places that might offer refugia to Bats are lit.
- 6.69 Paragraph 3.3.6: SCC welcomes the idea of toolbox talks but expects that Biodiversity Awareness should be in the list of subjects given. Seasonal toolbox talks would be of great benefit to the work force.

Document 7.5.3: Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]

- 6.70 Paragraph 2.4.5: It is suggested that protected species fencing might only be checked intermittently but, we believe, that such fencing must be checked daily by the ECoW (or a person suitably trained and instructed by the ECoW).
- 6.71 Paragraph 2.4.8: Winter lighting should be installed under the supervision of the ECoW to ensure that no places that might offer refugia to Bats are lit.
- 6.72 Paragraph 3.3.6: SCC welcomes the idea of toolbox talks but expects that Biodiversity Awareness should be in the list of subjects given. Seasonal toolbox talks would be of great benefit to the work force.

Document 7.5.3.1: CEMP Appendix A Outline Code of Construction Practice [APP-341]

- 6.73 Table 1.1, GG04: SCC welcomes the appointments of an Environmental Manager and ECoW and assume that these posts will also be a part of the proposed Ecology Working Group (comprising the Applicant and key stakeholders).
- 6.74 Table 1.1, GG05: In addition to the topics set out in this paragraph, SCC would like the Applicant to add Biodiversity Awareness Training (delivered by the ECoW) to ensure that construction workers are regularly kept up to date on what they might encounter and how to deal with issues that arise.
- 6.75 Table 1.1, LV01: SCC welcomes the proposed native shrub planting and considers it essential that it is of suitable, local provenance.
- 6.76 Table 1.1, B07: SCC welcomes the Applicant's proposed innovative approach to mitigate impacts on, especially, Bats and considers that the success (or otherwise) of this initiative should be monitored.

Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]

- 6.77 Table 1.1, GG10: SCC understands that noisy operations must happen but would welcome a commitment to liaise with the ECoW to ensure that appropriate mitigation for protected species is in place.
- 6.78 Table 1.1, B12: SCC welcomes the re-use of trees that must be removed as a good initiative, but they must be appropriately monitored (in their "out of the Ground" phase and once replanted).
- 6.79 Table 1.2, LV11: SCC welcomes the orientation of the Saxmundham Converter Station to retain existing landscape features.
- 6.80 Table 1.2, LV13: SCC welcomes the Applicant's commitment to enhancing habitats.
- 6.81 Table 1.1, GG04: SCC welcomes the appointments of an Environmental Manager and ECoW and assume that these posts will also be a part of the

- proposed Ecology Working Group (comprising the Applicant and key stakeholders).
- 6.82 Table 1.1, GG05: In addition to the topics set out in this paragraph, SCC would like the Applicant to add Biodiversity Awareness Training (delivered by the ECoW) to ensure that construction workers are regularly kept up to date on what they might encounter and how to deal with issues that arise.
- 6.83 Table 1.1, LV01: SCC welcomes the proposed native shrub planting and considers it essential that it is of suitable, local provenance.
- 6.84 Table 1.1, B07: SCC welcomes the Applicant's proposed innovative approach to mitigate impacts on, especially, Bats and considers that the success (or otherwise) of this initiative should be monitored.
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- 6.86 Table 1.1, GG10: SCC understands that noisy operations must happen but would welcome a commitment to liaise with the ECoW to ensure that appropriate mitigation for protected species is in place.
- 6.87 Table 1.1, B12: SCC welcomes the re-use of trees that must be removed as a good initiative, but they must be appropriately monitored (in their "out of the Ground" phase and once replanted).
- 6.88 Table 1.2, LV11: SCC welcomes the orientation of the Saxmundham Converter Station to retain existing landscape features.
- 6.89 Table 1.2, LV13: SCC welcomes the Applicant's commitment to enhancing habitats.

Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]

- 6.90 Paragraph 1.2.4: SCC welcomes that the Outline Landscape and Ecological Management Plan ("OLEMP") is a live document that will be updated and refined and considers that the proposed Ecology Working Group will also be able to discuss and agree updates.
- 6.91 Paragraph 1.2.4: SCC looks forward to seeing the planting scheme and commenting on this, but considers that, because of the erratic nature of Suffolk's weather patterns (especially in Spring), a ten-year aftercare period would be considerably more appropriate than five years. Any species planted must be native and ideally of local provenance to give them the best chance of establishing successfully.
- 6.92 Paragraph 1.5: SCC welcomes the Applicant's OLEMP objective to diversify ecological value through restoration.
- 6.93 SCC welcomes the Applicant's acknowledgement of impacts on various species and habitats, for example Skylark, as well as the proposals to mitigate

connectivity issues for Bats. SCC considers that these should be monitored and reports made to the Ecology Working Group.

- 6.94 Table 5.1: Hornbeam (*Carpinus betulus*) should be added to the Woodland mix, although SCC notes that it is mentioned in Table 5.3: Native Hedgerows. All plants should be locally sourced and of suitable provenance.
- 6.95 Paragraph 5.3.2: SCC considers that the acid grassland restoration and enhancement area should be maintained in perpetuity, rather than the proposed ten years. Acid grassland take at least 5 years to establish fully, and a 5-year aftercare period would be insufficient if the condition of the acid grassland falls below the agreed standard in that time. Paragraph 5.4.44 of EN-1 states that habitat creation or enhancement relating to biodiversity net gain should be maintained “*for a minimum period of 30 years, or for the lifetime of the project, if longer.*” If that is not feasible, then management must continue until such time as the restored areas have met the standard agreed, for example by the Ecology Working Group.
- 6.96 Paragraph 6.5: SCC are very interested in the details of planting schemes and the monitoring and management that is put in place. Again, the Ecology Working Group will be the ideal forum for the Applicant and key stakeholders to discuss any issues and suggest revised prescriptions. SCC notes that it cannot see anywhere in the documents mention of Deer monitoring and management. The planting proposed will be very vulnerable and the Applicant should gain an understanding of the local Deer populations and their movements around this area and devise strategies to protect the new planting.
- 6.97 Paragraph 6.8.9 - botanical surveys should take place between May and August (optimal botanical survey window) in order to attain an accurate picture of how successfully the sward has established.

Table 5: Summary of local impacts – Cultural Heritage					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative / Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
5.1	Impacts to defined archaeological remains during pre-commencement and construction works within the substation or converter station sites, where any ground disturbance would lead to the destruction or removal of archaeology	C	Negative	Archaeological mitigation or Preservation in Situ for all areas of archaeological significance defined during archaeological assessment work, secured by an updated OWSI and Requirement 14 (in line with comments below) and to be agreed with SCCAS	NPS EN-1Part 5.9 EN-3 NPPF Part 16 SCLP Policy 11.7
5.2	Impacts to defined archaeological preservation in situ areas within the substation or converter station sites should any additional works or activities take place within these areas during operation, potentially leading to the destruction or removal of archaeology	O	Negative	Ongoing protection of defined archaeological Preservation in Situ areas in line with requirements set out within a bespoke management plan, secured by an updated OWSI and Requirement 14 (in line with comments below) and to be agreed with SCCAS	NPS EN-1Part 5.9 EN-3 NPPF Part 16 SCLP Policy 11.7

5.3	Impacts to defined archaeological preservation in situ areas within the substation or converter station sites should any additional works or activities take place within these areas during decommissioning, potentially leading to the destruction or removal of archaeology	D	Negative	Ongoing protection of defined archaeological Preservation in Situ areas in line with requirements set out within a bespoke management plan, secured by an updated OWSI and Requirement 14 (in line with comments below) and to be agreed with SCCAS	NPS EN-1Part 5.9 EN-3 NPPF Part 16 SCLP Policy 11.7
5.4	Impacts to defined archaeological remains during pre-commencement and construction works within the landing site and cable corridor, where any ground disturbance would lead to the destruction or removal of archaeology	C	Negative	Archaeological mitigation or Preservation in Situ for all areas of archaeological significance defined during archaeological assessment work, secured by an updated OWSI and Requirement 14 (in line with comments below) and to be agreed with SCCAS	NPS EN-1Part 5.9 EN-3 NPPF Part 16 SCLP Policy 11.7
5.5	Impacts to defined archaeological preservation in situ areas within the landing site and cable corridor should any additional works or activities take place within these areas during	O	Negative	Ongoing protection of defined archaeological Preservation in Situ areas in line with requirements set out within a bespoke management plan, secured by an updated OWSI	NPS EN-1Part 5.9 EN-3 NPPF Part 16

	operation, potentially leading to the destruction or removal of archaeology			and Requirement 14 (in line with comments below) and to be agreed with SCCAS	SCLP Policy 11.7
5.6	Impacts to defined archaeological preservation in situ areas within the landing site and cable corridor should any additional works or activities take place within these areas during decommissioning, potentially leading to the destruction or removal of archaeology	D	Negative	Ongoing protection of defined archaeological Preservation in Situ areas in line with requirements set out within a bespoke management plan, secured by an updated OWSI and Requirement 14 (in line with comments below) and to be agreed with SCCAS	NPS EN-1Part 5.9 EN-3 NPPF Part 16 SCLP Policy 11.7

7 Cultural Heritage

Policy Context

National Policy

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 7.1 “5.9.1 The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground.
- 7.2 5.9.2 The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped, and planted or managed flora.
- 7.3 5.9.3 Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural, or artistic interest are called “heritage assets.”²⁷ Heritage assets may be buildings, monuments, sites, places, areas or landscapes, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.²⁸ Significance derives not only from a heritage asset’s physical presence, but also from its setting,²⁹”

National Planning Policy

National Planning Policy Framework, December 2024

“Considering potential impacts”

- 7.4 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

²⁷ Where the terms “heritage assets” or “designated heritage assets” are referred to, this also refers to “historic assets” or “designated historic assets” which is the terminology used in Welsh planning policy.

²⁸ Terms used in this section, including the term “Designated Heritage Asset” are defined in Annex 2 of the National Planning Policy Framework.

²⁹ The setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral. In Wales, the definition of the setting of a heritage asset is similar, but slightly different. The Welsh definition can be found in TAN 24. See <https://www.gov.wales/technical-advice-note-tan-24-historic-environment>

- 7.5 Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) Grade II listed buildings, or Grade II registered parks or gardens, should be exceptional.
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional³⁰.
- 7.6 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.7 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”
- 7.8 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.9 Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 7.10 Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However,

³⁰ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

- 7.11 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- a) the nature of the heritage asset prevents all reasonable uses of the site; and
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.
- 7.12 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”
- 7.13 The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.14 Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.
- 7.15 Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Local Plan Policy

Suffolk Coastal Local Plan

- 7.16 Policy SCLP10.4: Landscape Character, states that development proposals must preserve and restore or enhance historic or human-caused features identified in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.

- 7.17 Policy SCLP11.1: Design Quality, notes the importance of proposals demonstrating an understanding of and seeking to enhance and complement the character of the built, historic, and natural environment.
- 7.18 Policy SCLP11.3: Historic Environment, states that “all development proposals which have the potential to impact on heritage assets, or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment”.
- 7.19 Policy SCLP11.4: Listed Buildings, sets out the requirements for a proposed development affecting the setting of a listed building to be supported. These requirements include the proposals being of an “appropriate design, scale, form, height, massing and position which complement the existing building.”
- 7.20 Policy SCLP11.5: Conservation Areas, states that development proposals which has potential to affect the setting of a Conservation area should demonstrate an understanding of the significance of the conservation area, assess the potential impact of the proposals on that significance, be of an appropriate design, scale, form, height, massing and position, and use high quality materials and construction methods which complement the area’s character. Saxmundham Conservation Area is to the north of the converter station site.
- 7.21 Policy SCLP11.6: Non-Designated Heritage Assets, states that proposals that would result in harm to the significance of a Non-Designated Heritage Asset will be judged based on the balance of the scale of the harm, and the significance of the asset.
- 7.22 Policy SCLP11.7 Archaeology, notes the need for “archaeological assessment proportionate to the potential and significance of remains” where proposals affect an area of known or suspected archaeological importance. This policy also states that preservation in situ is preferred.
- 7.23 Policy SCLP11.8: Parks and Gardens of Historic or Landscape Interest, identifies Carlton Park, Kelsale, which is just north of the converter station site, as an historic parkland, with Non-Designated Heritage Asset status. This policy states that proposals affecting this parkland must be accompanied by landscape design and management proposals to ensure design, mitigation and enhancement is of a high standard.

Neighbourhood Plans

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 7.24 Policy ACT10: Heritage Protection and enhancement, states that development proposals must preserve or enhance the significance of the heritage assets of the parish, take account of important views into and out of Thorpeness Conservation Area, and be of an appropriate scale, form, height, massing, alignment, materials and detailed design with respect to the area’s local distinctiveness, character, appearance and setting.

- 7.25 Policy ACT11: New design, states that new development in the parish should reflect its local distinctiveness and rural character and seek to raise the quality and design of new buildings. This policy also sets out the criteria that new development proposals should accord with

Saxmundham Neighbourhood Plan

- 7.26 Policy SAX10: Historic town centre and Conservation Area, states that the special character of Saxmundham Conservation Area and its setting will be preserved and enhanced. The policy outlines how this will be achieved, including ensuring that new development is sympathetic to the Area's special qualities, character and appearance and takes into account its historic significance, protecting the Area from development which adversely affects views into or out of the Conservation Area, ensuring that developments complement the built form and layout of the settlement, maintaining and enhancing features that contribute to the Area's local distinctiveness, and using high-quality traditional building materials.
- 7.27 Policy SAX11: Non-designated Heritage Assets, identifies The Layers as a non-designated heritage asset. The proposed River Fromus bridge would have a significant adverse effect on this asset.

Saxmundham Draft Modified Neighbourhood Plan

- 7.28 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states "The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 7.29 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied."

Local Impact Assessment

Construction Phase Impacts

Positive

- 7.30 None identified.

Neutral

- 7.31 None identified.

Negative

- 7.32 A large number of the proposed areas for this scheme fall within locations where below ground archaeological remains of significance have been defined through geophysical survey and trial trenched evaluation, with high potential for additional below ground heritage assets to survive within parts of the scheme red line boundary which have not been subject to full archaeological assessment. Construction of surface infrastructure and underground cables, alongside any pre-commencement works or works related to the scheme which involve ground disturbance, will therefore lead to loss of archaeological remains in many areas. Without appropriate mitigation, the negative impact upon cultural heritage will be significant.
- 7.33 The archaeological implications of multiple schemes in this landscape are cumulatively increasing for every project. The inclusion of options for coordination with other projects within proposals would increase impacts as it reduces the flexibility to be able to avoid significant archaeology.
- 7.34 There would be direct and indirect material impacts upon heritage assets, including the partial or complete removal or surviving below ground remains in many areas of the scheme, due to works proposed which involve significant ground disturbance.

Operational Phase Impacts

Positive

- 7.35 None identified.

Neutral

- 7.36 Underground cable sections of the route would overtime meld into the landscape.

Negative

- 7.37 Impacts upon the setting of heritage assets from surface infrastructure would remain throughout operation.
- 7.38 Any works during site operation involving additional below ground disturbance have the potential to have a direct impact upon any archaeological remains not previously mitigated as part of the construction phase e.g. should works

be necessary in any areas where preservation in situ has been utilised as a mitigation strategy.

Decommissioning Phase Impacts

Positive

7.39 None identified.

Neutral

7.40 None identified.

Negative

7.41 Any works during site decommissioning involving additional below ground disturbance have the potential to have a direct impact upon any archaeological remains not previously mitigated as part of the construction phase e.g. should works be necessary in any areas where preservation in situ has been utilised as a mitigation strategy.

Required Mitigation

- 7.42 Matters relating to Built Heritage are led by East Suffolk Council, however, other elements related to the historic environment, such as those relating to Archaeology matters, are provided below.
- 7.43 Landscaping of surface infrastructure and the cable route, alongside other appropriate mitigation measures, will be required to preserve the setting of above ground heritage assets.
- 7.44 All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation (“OWSI”). The submitted OWSI is currently in draft form and comments by SCC Archaeological Service (“SCCAS”) (below) need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation (“WSIs”) following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all subsequent WSIs/contractor method statements would need to be approved by SCCAS.
- 7.45 Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin.

- 7.46 In communication with NGET's consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.
- 7.47 SCCAS consider that any remaining areas within the Order Limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project and any additional areas subsequently added to the Order Limits. All site accesses, haul roads, compounds, and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined.
- 7.48 For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.
- 7.49 The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and Lion Link). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and Lion Link at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.
- 7.50 At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within the submitted documentation.

- 7.51 Given the interaction with the EA1N/EA2 and Lion Link schemes, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme.
- 7.52 The Council understands that NGET (Sea Link) and National Grid Ventures (“NGV”) (Lion Link) are looking into a data sharing agreement. The Council supports this as it would avoid duplication of effort. Co-operation with SPR also be beneficial, given the overlapping nature of this scheme with the EA1N/EA2 project.
- 7.53 Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (“HEMP”), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.
- 7.54 At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ., further to the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable.
- 7.55 However, given the potential to contain settlement evidence and other remains, SCCAS would advise that a partial excavation of just the central portion of this feature would not be appropriate or in line with best practice and this monument would therefore need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route. The original Order Limits would not allow for this and therefore we would advise the need for a slight expansion of the scheme Order Limits around this monument to facilitate full excavation of the enclosure and any associated internal and external remains. This would,

however, only need to be a fairly localised expansion and remove the need for further assessment work at this stage.

- 7.56 If the Applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, SCCAS do not object to the expansion of the Order Limits in line with the areas proposed in an additional submission. SCCAS are pleased that geophysical survey has now been completed for these new areas, however, further anomalies of likely archaeological interest have been defined, along with the potential for further unknown archaeological remains which have not been able to be detected. As such, any changes to the route beyond a small increase around the D-Shaped enclosure, would require a programme of trial trenched archaeological evaluation prior to the determination of the DCO, in order for the nature, extent and significance of any archaeological remains to be defined and to allow appropriate archaeological mitigation strategies to be determined and also informed design and planning decisions to be made.
- 7.57 To the west of Grove Road at Friston, the Order Limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO Order Limits as part of the Sea Link project, in line with preservation in situ requirements.
- 7.58 As has been shown by other Nationally Significant Infrastructure Projects (“NSIPs”) in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule.
- 7.59 Numerous large projects taking place in the county at the same time is putting significant pressure on available archaeological work forces. Therefore, SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity.
- 7.60 SCCAS are not currently in agreement with the proposed wording of DCO Requirement 14 and amendments are necessary (see below comments) for agreement to be reached. SCCAS would also recommend amendment to the clause relating to human remains.
- 7.61 Finally, although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that

the Applicant should demonstrate a commitment to delivering enhanced public understanding.

- 7.62 SCCAS has reviewed the relevant control documents and provides comments as follows. These comments should be addressed by the Applicant with appropriate changes made to the relevant documents to ensure impacts on cultural heritage are adequately avoided or mitigated.

Comments on application documents

- 7.63 In what follows, SCCAS provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]

- 1.1 3.4.9 Some parts of the scheme have not yet been subject to trial trenching, and the submitted trench report is for the P1 trenches only, with the P2 trench report still pending.
- 7.64 3.4.29 Multi-period archaeological remains have been defined, with features dated to all periods recorded.
- 7.65 3.4.31 As long as there are no preparation works involving ground disturbance to create areas of grassland, plans do not change in these areas to include alternative ecological mitigation measures involving ground disturbance and no additional mitigation areas are subsequently deemed as necessary beyond the current Order Limits.
- 7.66 3.5.6 Areas which are being preserved in situ as part of the EA1N/2 project will not have already had impacts mitigated and therefore should impacts be planned in these areas as part of this project, Sea Link will be responsible for undertaking appropriate mitigation.
- 7.67 3.7.24 Additional multi-period remains have also been recorded during the P2 works but are not yet included in assessments.
- 7.68 3.7.42 Although quite a few additional remains were recorded that had not been detected through geophysical survey.
- 7.69 3.7.45 Again it should be noted that currently only the results of the P1 trenching works are available and that additional remains to those summarised in this section were however recorded during the P2 trenching work.
- 7.70 3.7.46 Please can a copy of the GI report be provided to SCCAS as soon as possible as this has not yet been provided to SCCAS. For the area east of

landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood.

- 7.71 3.9.5 What about features of interest recorded during P2 trenching and additional features identified by SCCAS from P1 trenching as requiring mitigation? Also, there is potential for additional features of interest to be recorded in any areas where trenched evaluation has not yet been completed. This assessment can only be considered as a partial, point in time, assessment at present and this should be recognised.
- 7.72 3.9.10 Impacts to areas identified as of archaeological interest, even those of local significance will be high without appropriate mitigation, given complete or substantial removal of remains will occur as part of works associated with this scheme (unless preservation in situ is achievable).
- 7.73 3.9.89 Measures would need to be in place during site operation to protect any areas of archaeology mitigated through preservation in situ.
- 7.74 3.9.119 Measures would need to be in place during any decommissioning activities to protect any areas of archaeology mitigated through preservation in situ.
- 7.75 3.10.2 H05 Areas of archaeological remains to be preserved in situ will require a detailed Historic Environment Management Plan (HEMP) which sets out the strategy for the ongoing protection of these remains throughout construction, operation and in perpetuity.
- 7.76 3.10.2 Also completion of trial trenched evaluation required in areas where this has not already been undertaken, followed by suitable mitigation as appropriate.

Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]

- 7.77 5.1.3 Given remains dating to both the Neolithic and Bronze Age periods have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.
- 7.78 5.1.4 Given remains dating to both the Iron Age and Roman periods have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.
- 7.79 5.1.5 Although no remains of Saxon date have been identified so far during evaluation works, features of this date are often not easy to detect by geophysical survey and are easily missed by trial trenching. In addition, numerous Saxon remains have been identified during archaeological investigations nearby to a number of sections of this scheme as part of the

EA1N/2 project and so SCCAS do not agree that there is negligible potential for Saxon remains.

- 7.80 5.1.6 Given remains dating to medieval period have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.
- 7.81 5.1.7 Given remains dating to the post-medieval period, in particular military remains, have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.
- 7.82 6.2 What about features of interest recorded during P2 trenching and additional features identified by SCCAS from P1 trenching as requiring mitigation? Also, there is potential for additional features of interest to be recorded in any areas where trenched evaluation has not yet been completed. This assessment can only be considered as a partial, point in time, assessment at present and this should be recognised.

Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]

- 7.83 The submitted OWSI is currently in draft form and comments by SCCAS (below) need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.
- 7.84 Throughout the document there are multiple references to ‘the Archaeological Advisor to SCCAS.’ In all instances, this should be ‘the Archaeological Advisor to the LPA from SCCAS.’
- 7.85 Executive summary: a statement needs including regarding that following approval of the Outline Onshore Overarching WSI, that site specific WSIs will be produced which set out detailed evaluation and mitigation requirements for the scheme. SCCAS’s preferred approach would be that a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. These documents will need approval by SCCAS.
- 7.86 1.3.1 For clarity this should say ‘archaeological heritage assets’ given that Built Heritage is not dealt with in this document.
- 7.87 1.5.4 As well as during construction works, also during any other pre-commencement works.

- 7.88 Table 3.1 of the CEMP will need updating to include relevant archaeological roles and responsibilities.
- 7.89 Non-designated assets section: should be mentioned that areas of multi-period remains (dating from the Neolithic onwards) were also scattered throughout the scheme Order Limits, and also that additional non-designated heritage assets were recorded during the P2 trenching works, the results of which are not yet available.
- 7.90 2.4.3 General research aims relating to military remains would also be appropriate.
- 7.91 3.1.2 All areas of the scheme where ground disturbance will take place, and which have not previously been subject to evaluation will need to be scoped in for trial trenching. Any ecological mitigation areas which involve ground disturbance, site accesses, haul road, and compounds will also require trial trenched evaluation if they have not already been included within previously evaluated areas.
- 7.92 3.1.3 The SCCAS geophysical survey and evaluation guidance 2025 and East of England fieldwork requirements document should both be referenced here.
- 7.93 3.2.3 OR full excavation. An archaeological watching brief would not be acceptable; however, a programme of continuous archaeological monitoring and recording may be acceptable in some circumstances. These works would need to be covered by either an addendum to the project wide mitigation WSI/ site specific contractor method statements or an additional method statement.
- 7.94 3.3.1 (and 4.2.6) SCCAS ask for 30m x 1.8m trenches as standard.
- 7.95 3.3.2 As above, SCCAS's preference is for an overarching WSI which sets out ongoing evaluation and mitigation requirements for the entire onshore scheme in Suffolk, supplemented by site specific contractor method statements for individual areas of archaeological assessment/mitigation. These documents will need approval by SCCAS.
- 7.96 3.3.3 OR full excavation/ a programme of continuous archaeological monitoring and recording which may be acceptable in some circumstances (preservation in situ measures might also require fencing off areas and avoidance of ground disturbance within defined areas etc).
- 7.97 Section 3 also needs to set out that for the area east of landfall which will be subject to directional drilling, appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood.
- 7.98 4.1 The need for a joined-up approach to mitigation at both the Saxmundham Converter Station and Friston substation and a collaborative approach with the EA1N/2 and Lion Link projects should also be set out here.

- 7.99 4.1.1 Excavation needs removal from end of second sentence. This paragraph should set out that where PIS is not possible that preservation through record will be used as an alternative mitigation strategy for heritage assets defined during archaeological assessment works.
- 7.100 4.1.2 Also preserve by record any remains which are unable to be preserved in situ and therefore will be removed or damaged by the development.
- 7.101 4.1.7 Prior to the production of contractor method statement, a site specific WSI will also be required- SCCAS preferred project wide approach to this is outlined above.
- 7.102 4.2.1 should be moved to section 3 as part of ongoing evaluation requirements.
- 7.103 4.2.2 – 4.2.9 again should be incorporated into section 3 as evaluation not mitigation.
- 7.104 4.2.10 This should be continuous archaeological recording and not monitoring/watching brief. Constant archaeological monitoring of all works would be necessary.
- 7.105 4.2.16 This should be strip, map, and record not sample.
- 7.106 4.2.22 Including provision to extend areas should significant archaeological remains be defined.
- 7.107 4.2.22 and 4.2.26 30m buffer zones should be left around defined excavation and strip, map areas to allow for extension as appropriate and to guide the location of spoil storage. These buffer zone areas must also be excluded from any works involving ground disturbance until signed off by SCCAS and handed back to the developer.
- 7.108 4.2.27 the sampling strategy may need to be refined based upon what is found once the site is stripped (as in point 4.3.18)
- 7.109 Section 4 should also set out that preservation in situ is another mitigation strategy which may be used and this section should outline how for any features which are either to be preserved in situ as part of project design or for any features of national significance defined during ongoing evaluation work, that the strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (HEMP), to be agreed with SCCAS, in order to secure the appropriate management of these remains.
- 7.110 4.3.2 Individual codes will be required for each sperate mitigation area.
- 7.111 4.3.15 Should complex archaeology or sensitive remains such as human remains be defined during trial trenched evaluation, the strategy for investigation at this stage should be agreed with SCCAS.

- 7.112 4.3.17 Ring ditches should be at least 50% excavated. Industrial features should be 100% excavated. Any SFBs defined should be dug in quadrants, with opposing quadrants removed first, followed by full excavation.
- 7.113 4.3.27 the HE 2011 Environmental guidance should be referenced here.
- 7.114 4.3.30 The Applicants needs to clarify whether they are using the 2017 guidance.
- 7.115 4.3.37 The receiving archive will be the SCCAS archive so the SCCAS archive guidance 2024 needs referencing here.
- 7.116 4.3.44 The Suffolk FLO should immediately be informed, and the coroner will need to be notified within 14 days.
- 7.117 5.1 We know that human remains are present in a number of areas of the scheme and therefore this section should be moved to the end of section 4.
- 7.118 5.1.1 The 2023 SCCAS Excavating Inhumations for Mineral Preserved Organics Guidance needs listing here and the OWSI should set out that these requirements will need to be followed in appropriate instances. Other relevant best practice guidance should also be referenced here.
- 7.119 6.3.4 And also digital archiving provisions
- 7.120 6.3.6 Provision should also be made for hard copies to be submitted to the County HER.
- 7.121 6.4.1 All mitigation sites will require a PXA to be prepared, whether they warrant publication or not. Provision needs to be made for a PXA for each mitigation site (or group of mitigation areas should they be located in the same area/contain related remains). Following the submission and approval of all PXAs, a project wide UPD will need to be prepared which sets out the ongoing strategy for assessment, reporting and publication for the project. Provision should be made for full grey lit research archive reports for ALL sites, independent of publication given not every element of sites will necessarily be published. All reports will need review and approval by SCCAS. Sections 6.4 and 6.5 therefore need revising accordingly and greater detail regarding the approach to post-excavation assessment and reporting and the contents of documents needs including. SCCAS suggest reviewing the Sizewell OWSI as a guide to the expected contents of this section.
- 7.122 6.5 Provision should also be made to prepare summaries for inclusion in the annual PSIAH fieldwork round-up and blog posts to be prepared for the Suffolk Heritage Explorer.
- 7.123 6.6 Each separate fieldwork report/PXA etc will require a separate OSIS record.
- 7.124 6.6.2 Copies of the relevant OASIS summary sheet must be included in all reports.
- 7.125 6.7 Each PXA must include a quantification of the site archive for each area.

- 7.126 6.7.1 The SCCAS archive will be the required archive repository
- 7.127 6.7.2 The SCCAS archive will be the required archive repository and so the 2024 SCCAS archive requirements should be referenced
- 7.128 6.7.4 Specify 'Trusted Digital Repository' as 'Archaeology Data Service' which is the industry wide repository for digital archaeological archives
- 7.129 7.1 As per above comments, the SCCAS preference is for a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk to be submitted, rather than piecemeal areas, supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. This is so that the ongoing archaeological requirements for the project as a whole can be clearly understood and so this document can also be provided to all project contractors.
- 7.130 7.1.4 Also trenching results overlain on the geophysics greyscale, archiving provisions, details of site and specialist staff, fieldwork timelines, site security provisions, and digital data management plans.
- 7.131 8.5 No works (either pre-commencement or construction) involving ground disturbance may commence within defined archaeological mitigation areas until they have been formally signed off by SCCAS.
- 7.132 Section 9: Provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding. This may stretch to long term management of assets, provision of outreach opportunities such as blogs, site visits, visits to schools, temporary displays/'pop-up' museums, newsletters and updates, talks, popular publication, displays to be hosted in areas relevant to the scheme, community involvement, and strategic linking of archaeology with any other landscape/tourism initiatives and public space works.

References

- A 2025 version of the SCCAS standard guidance for excavation and continuous monitoring and recording are now available and so these updated versions should be used/referred to.
- The SCCAS geophysical survey and trenching guidance 2025 should also be included.
- The 2023 SCCAS Excavating Inhumations for Mineral Preserved Organics Guidance needs listing
- The SCCAS archive guidance (2024) needs listing
- The Regional research frameworks documents need referencing here.
- HE guidance relating to Environmental Archaeology (2011) needs listing

- A plan showing the status of evaluation works for the entire onshore area of scheme in Suffolk, clearly identifying which land parcels have had evaluation works completed and those where evaluation/assessment is still pending should be included in the OWSI.

Document 6.3.2.3.D: ES Appendix 2.3.D Geophysical Survey Report [APP-112]

- 7.133 SCCAS have approved this report. Please can a hard copy be supplied to the County HER and the OASIS record be completed ready for sign off.

Document 6.3.2.3.E: ES Appendix 2.3.E Aerial Photography and LiDAR Report [APP-113]

- 7.134 1.1.3 This report relates to Suffolk and not Kent
- 7.135 HER site codes and not MSF numbers should be used throughout the report
- 7.136 An OASIS record should be produced for this report and a copy of the summary sheet included as an appendix

Document 6.3.2.3.F: ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]

- 7.137 SCCAS have approved this report. Please can a hard copy be supplied to the County HER and the OASIS record be completed ready for sign off.

Draft Development Consent Order (dDCO) [AS-087]

- 7.138 DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the OWSI to secure this; therefore, SCCAS advise the need for amendments in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery of the project and prevent potential delays to the sign off of archaeological requirements.

- 7.139 The clause relating to human remains also needs amending to prevent issues in appropriately dealing with archaeological human remains and potential delays to the project.

- 7.140 DCO Requirement 14 – SCCAS suggested wording:

(1) The proposed development must be undertaken in accordance with the following documents as relevant to the location of the works unless otherwise agreed with the relevant planning authority:

(a) Outline Onshore Overarching Written Scheme of Investigation – Suffolk for onshore works within the county of Suffolk.

(b) Outline Onshore Overarching Written Scheme of Investigation – Kent for onshore works within the county of Kent; and

(c) Outline Offshore Overarching Written Scheme of Investigation and the Marine Archaeological Method Statement as appropriate

(2) No stage of the authorised development may commence until for that stage either a preservation in situ Historic Environment Management Plan or a site-specific written scheme of investigation (which accords with the relevant Overarching Written Scheme of Investigation and is informed by the pre-commencement archaeological surveys) has been submitted to and approved by the relevant planning authority.

(3) Site-specific written schemes of investigation must be in accordance with the outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include:

(a) an assessment of significance and research questions.

(b) the programme of methodology of site investigation and reporting.

(c) the programme for post-investigation assessment.

(d) proposals for providing for the analysis of site investigation and recording.

(e) proposals for providing archive deposition of the analysis and records of the site investigation.

(f) nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and

(g) an implementation timetable.

(4) All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, prior to the commencement of any pre-commencement or construction works in that stage.

(5) Unless otherwise agreed with the relevant planning authority:

(a) No later than two years following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment for that site must be completed in accordance with the Overarching Archaeological Written Scheme of Investigation and submitted to Suffolk County Council for approval.

(b) No later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design for all sites, must be submitted to Suffolk County Council for approval. The archaeological updated project design must be produced in general accordance with the Overarching Archaeological Written Scheme of Investigation, include details of the scope of post-excavation analysis and publication and have regard to the

site-specific research agendas set out in the site-specific written schemes of investigation.

(c) Post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated project design.

(d) The full archaeological archive must be submitted to the Suffolk County Council Archaeological Service (Archive) in accordance with the archaeological updated project design.

- 7.141 DCO Part 4 Supplemental powers: Removal of human remains- SCCAS would advise that the current wording has implications with regards to dealing with archaeological human remains appropriately and also has the potential to cause delays to the project.
- 7.142 There are no records of any historic human remains or burial sites anywhere within the Sea Link Order Limits. During archaeological evaluation work undertaken across the scheme so far, a number of human cremations, thought to be of prehistoric date, have been recorded. In addition, it is not uncommon for human remains to be uncovered during archaeological fieldwork and additional archaeological inhumations and cremations can be expected to be identified during ongoing archaeological evaluation and mitigation works. Given the age of these remains, it will not be possible for the individual or any living relative to be identified.
- 7.143 The current wording of the DCO would place certain requirements on the developer with regards to human remains, however, for remains over 100 years old it is usually standard archaeological practice that the terms of the Burial Act 1857 are followed. The requirements of the DCO are therefore in conflict with best practice for dealing with human remains in archaeological contexts as the terms of this article would lead to probable burial features being exposed for an extended period and at a risk from damage or harm. In addition, the Overarching Archaeological WSI sets out the need for excavation of human remains to be undertaken in line with the requirements of the Burial Act, as well as archaeological best practice guidance.
- 7.144 SCCAS would therefore advise the need for the addition of a clause with regards to appropriately dealing with archaeological human remains believed to be over 100 years old in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents.

Table 6: Summary of Local Impacts – Water Environment					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative/ Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
6.1	Surface water run-off has the potential to cause flooding during the construction phase, particularly around the substation due to Friston's high sensitivity in terms of surface water flood risk.	C	Negative	Requirement governing Flood Risk Management and Drainage Strategy through the approval of detailed documents in accordance with robust outline documents	NPS EN-1 5.8 / NPPF / SCLP 3.4, 9.5, 9.6, 10.3
6.2	Currently the proposals from Sea Link, regarding surface water drainage, do not align with the already consented Scottish Power renewable proposals. Given the sensitivity of Friston in terms of surface water flood risk, there is the potential for surface water flooding in the Friston area because of the substation's operation.	O	Negative	Coordination with EA1N/EA2 projects. Appropriate drainage and mitigation measures secured by control documents	NPS EN-1 5.8 / NPPF / SCLP 3.4, 9.5, 9.6, 10.3

6.3	Surface water runoff has the potential to cause flooding during the decommissioning phase if not managed.	D	Negative	Requirement governing Flood Risk Management and Drainage Strategy through the approval of detailed documents in accordance with robust outline documents	NPS EN-1 5.8 / NPPF / SCLP 3.4, 9.5, 9.6, 10.3

8 Water Environment

Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

- 8.1 “5. Reducing risks from flooding and coastal erosion
- 8.2 The Environment Agency will use its role in statutory planning consultations to seek to make sure that new developments are flood resilient and do not increase flood risk.”

National Policy Statements

Overarching Policy Statement for Energy EN-1

Applicant’s assessment

- 8.3 5.8.13 A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving:
- sites of 1 hectare or more
 - land which has been identified by the EA or NRW as having critical drainage problems
 - land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future
 - land that may be subject to other sources of flooding (for example surface water)
 - where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems.”

National Planning Policy

National Planning Policy Framework, December 2024

- 8.4 “170. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”
- 8.5 “181. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate,

applications should be supported by a site-specific flood-risk assessment.³¹ Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location.
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate.
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”

Local Plan Policy

Suffolk Coastal Local Plan

- 8.6 Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects, states that appropriate flood and erosion defences should be incorporated into the proposals for Major Energy Infrastructure Projects to protect the site during construction, operation, and decommissioning.
- 8.7 Policy SCLP9.5: Flood Risk, states that a Strategic Flood Risk Assessment should be carried out to assess whether proposals are at risk from flooding. It also states that proposals in areas at high risk from flooding (i.e. Flood Zones 2 and 3) will not be permitted, unless the Applicant has met the safety requirements in the Flood Risk National Planning Policy Guidance. The policy notes the need for proposals to “exhibit the three main principles of flood risk, in that, they should be safe, resilient and should not increase flood risk elsewhere.”
- 8.8 Policy SCLP9.6: Sustainable Drainage Systems, states that non-residential developments with 1000 square metres or more of floorspace, or on sites of 1 hectare or more, must use sustainable drainage systems (“SuDS”) to drain surface water. This policy also states that runoff rates must be restricted to greenfield runoff rates where possible.

³¹ A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

- 8.9 Policy SCLP10.3: Environmental Quality, states that development proposals must protect the quality of the environment, including minimising water pollution, seeking improvements to water quality, and achieving the Water Framework Directive objectives.

Neighbourhood Plans

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 8.10 Policy ACT8: Drainage and surface water flooding, states that developments must use an appropriate SuDS. The policy also identifies existing areas of localised flooding in the parish, and states that proposals must demonstrate how they will seek to ensure run off rates are kept below greenfield run off rates, mitigate their own flooding and drainage impacts, and prevent increased flooding elsewhere.

Leiston Neighbourhood Plan

- 8.11 This plan highlights that flooding is an issue of concern to the community of Leiston.
- 8.12 Policy FL1: Addressing localised flooding matters, states that all new development must not worsen foul and surface water flooding to existing properties.

Saxmundham Draft Modified Neighbourhood Plan

- 8.13 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states “The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 8.14 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied.”

Local Impact Assessment

Construction Phase Impacts

Positive

- 8.15 None identified.

Neutral

- 8.16 None identified.

Negative

- 8.17 Surface water run-off has the potential to cause flooding during the construction phase, particularly around the substation due to Friston's high sensitivity in terms of surface water flood risk.

Operational Phase Impacts

- 8.18 Operational effects were scoped out of the ES.

Positive

- 8.19 None identified.

Neutral

- 8.20 On the assumption that field drainage is reinstated following construction, no impacts are identified because of the underground cables.

Negative

- 8.21 Given the sensitivity of Friston in terms of surface water flood risk, there is the potential for surface water flooding in the Friston area because of the substation's operation.
- 8.22 Currently the proposals from Sea Link, regarding surface water drainage, do not align with the already consented Scottish Power renewable proposals.

Decommissioning Phase Impacts

Positive

- 8.23 None identified.

Neutral

- 8.24 None identified.

Negative

- 8.25 Surface water runoff has the potential to cause flooding during the decommissioning phase if not managed.

Required Mitigation

- 8.26 National mapping for the converter station site area suggests soils have good properties for infiltration. Therefore, the Council, as Lead Local Flood

Authority (“LLFA”), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network.

- 8.27 The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, if the substation is not delivered under SPR’s existing consent.
- 8.28 The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction. However, the Council considers that the return period to which the haul road drainage will be designed is unclear, as is the methodology that has been used for the indicative sizing of drainage features on the plans. It is essential that there is sufficient space within the Order Limits to accommodate such drainage provision, particularly the haul road.
- 8.29 Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Friston Flood Study report May 2020.
- 8.30 Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring there is adequate space available for any necessary mitigation within the Order Limits.
- 8.31 Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and therefore must be adequately assessed. The current Flood Risk Assessment does not sufficiently demonstrate this.
- 8.32 The Council is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of SPR’s EA1N/2 project. Sea Link’s Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR’s DCO consent due to the lack of assessment methodology or calculation included within the assessment.
- 8.33 SCC is not content with the Applicant’s assessment of flood risk in Friston. The Environmental Statement (“ES”) fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The

Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.

- 8.34 The County Council LLFA have also produced BMT Friston Flood Study report May 2020 for the Friston catchment, which is available to the Applicant should they not already have it, to enable them to assess existing surface water flood risk in the area.
- 8.35 The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, particularly the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to a viable discharge point.
- 8.36 The proposed substation is located directly over an ordinary watercourse. A surface water flow path adjacent to this watercourse has been identified as part of the BMT Friston Flood Study report May 2020, which would directly impact the chosen site location. The natural infiltration basin on site has also not been considered; this forms a critical component of the surface water regime.
- 8.37 The methodology, calculation, and areas used for the initial sizing of drainage features, both permanent and temporary are unclear at this time. The LLFA would expect accompanying plans and calculations to demonstrate how realistic the sizing of these features are, given the compact nature of the Order Limits. This also extends to impermeable areas and losses through permeable surfaces.
- 8.38 There is an inconsistency with the proposed Friston substation drainage strategy. The Flood Risk Assessment and plans do not provide clarity on the proposed system. Plans and some text suggest a single infiltration basin with overflow; other text suggests an overflow to an additional attenuation basin (2 basins).

Comments on application documents

- 8.39 In what follows, SCC as the LLFA for the Suffolk Onshore Scheme provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Plans and Drawings

- 8.40 Proposed Order Limits do not extend to the Friston main river up to Highway culvert, as was also the case for the SPR DCO. The County Council LLFA has encountered problems with the SPR projects due to work required outside of the DCO process, including work to facilitate site outfall(s). The Council therefore suggests that an extension of the Order Limits to the culvert at Grove Road may help to prevent similar issues if Sea Link is granted development consent.

Document 2.11: Water Bodies in the River Basin Plans [APP-035]

- 8.41 SCC considers that Friston main river is not noted in this document and considers it possibly should be. It is not a designated ‘main river’ as recorded by the EA on the national ‘main river map’ (for England) under section 193 of the Water Resources Act 1991 but it is managed by the Environment Agency (“EA”) as if it were a ‘main river’

Document 2.13: Design and Layout Plans [APP-037]

- 8.42 The drainage features for drawing DCO/S/DE/SS/1202 / DCO/S/DE/SS/1204 / DCO/S/DE/SS/1209 should ideally be scaled for the typical section to the requested return period of 1% AEP – there is not much space given on the typical cross section to facilitate drainage features and thus does not demonstrate a suitable level of assessment to determine realistic sizing. Construction water management will be a critical aspect of the delivery of the scheme.

Document 2.14.1: Indicative General Arrangement Plans [APP-038]

- 8.43 SCC would appreciate an explanation from the Applicant regarding what the initial sizing of permanent and temporary attenuation features is based on. SCC considers that they appear quite small and do not have outfall locations noted.
- 8.44 SCC considers it would be very useful to have general arrangement plans exclusively for drainage that shows the outfall points overall and any watercourses where they outfall ultimately, not just the point of discharge from the initial system.
- 8.45 It would be useful to overlay predicted surface water flood risk to the cable route and substation / converter plans. This is particularly useful in the determination of the suitability of drainage feature locations.
- 8.46 There are no plans showing indicative strategic drainage features or general drainage design. This seems an odd omission from the plans

Document 3.1: Draft Development Consent Order [AS-087]

- 8.47 SCC notes that Work No.2 and Work No.5, described in Schedule 1 Part 1 (Authorised Development), have no mention of drainage works.

- 8.48 In relation to Requirement 6, from SCC's experience with ScottishPower Renewables on EA1/2, the Flood Management Plan could be incorporated into the Construction Drainage Management Plan as a suitable appendix.

Document 6.8: Flood Risk Assessment [APP-292]

- 8.49 Paragraph 3.2.23 should also list the more detailed Suffolk LLFA drainage hierarchy that is found in SCC LLFA Appendix A (2023).
- 8.50 EA flood risk data is not noted in Table 4.1.
- 8.51 Paragraph 4.4.2 – has this statement considered runoff from within the Order Limits to the receptors which are outside of the Order Limits?
- 8.52 Paragraph C.1.2 – could be reworded to say, 'where infiltration is not feasible.' Should further testing show infiltration to be fully or partially viable, this should take precedent.
- 8.53 Paragraph C.1.7 – Assume that the climate change volume is proposed to be discharged via the Friston main river. This is an improvement on the SPR proposal, but SCC sees no reason not to provide full infiltration on site should it be feasible. Recent infiltration testing shows the ground to be viable to do so and there would appear to be space on site to do so. Given the high level of complication, SCC has had to deal with the outfall into the Friston main river. SCC would strongly recommend, if it is technically possible, attenuating and infiltrating all of the water onsite. This far reduces future complication in assessment of the impacts on the Friston main river, which is at a high risk of flooding from surface water.
- 8.54 Paragraph C.1.8 conflicts with the prior points and plans.
- 8.55 Paragraph C.1.9 should refer to Q-bar or Q-med, whatever is lower.
- 8.56 Details of the proposed Saxmundham scheme and its discharge point(s) would be useful in this section.
- 8.57 The Temporary Works Drainage Strategy on page C.2 – Construction compounds should all be constructed from type 3 aggregate with either a bare surface or permeable asphalt.
- 8.58 There is a lack of design return periods mentioned in this section which is a critical design consideration.
- 8.59 All basins should be considered as impermeable area in any calculations to account for a 'full basin' scenario.
- 8.60 Paragraph C.1.28 – SCC questions why 50% of the area is considered permeable. The runoff will all ultimately end up in the basins and thus should be considered as impermeable drained area even if constructed of permeable materials. For example, surface soils at both Friston and Saxmundham are not of high permeability and thus both pieces of infrastructure are likely to drain

into a network of permeable pipes and discharge into their respective basins. SCC is unsure of the methodology that has led to a 50% factor.

- 8.61 Paragraph C.1.29 – This is a safe assumption, assuming that subsoils in the 300-500mm range are permeable, but SCC would assume that drainage for the subbase will need to be collected.
- 8.62 Paragraph C.1.32 should ensure distinction between the sites. Saxmundham and Friston do not have the same strategy, and some areas of the text imply they are the same due to no distinction.
- 8.63 Paragraph C.1.33 – proposed pond depth up to 1m are not required to have a freeboard of 300mm but rather 30% of the design maximum water level. This will be a new standard in the updated LLFA guidance due during the construction of the site. For example, a freeboard of 300mm on a 500mm deep feature is 60%, this does not promote design flexibility.
- 8.64 There is a lack of assessment or inclusion of the BMT report when assessing flood risk in the Friston catchment.

Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]

- 8.65 Paragraph 4.2.34 – as per C.1.28 above. The gravel bases for equipment could be considered to function similarly to the subbase of permeable paving, which when set above impermeable soils is seen as either type b or c and has a connection to the wider attenuation network but will only be considered free draining if the subsoils are suitably permeable.
- 8.66 Paragraph 4.2.37 – as above.
- 8.67 Enabling works – bunding / silt fencing / management of anticipated flow routes should be set out at the earliest opportunities to ensure no adverse run off from the site during the enabling works. This also applies for ‘temporary construction compounds’ and should be considered at the earliest stages of any enabling works.
- 8.68 Paragraph 4.6.31 – good but should be mentioned in other relevant documents.
- 8.69 Haul roads – No mention of what return period the haul road drainage will be designed to. 1 in 100 should be the default return period but could be lowered if there is evidence that flood risk is minimal in the event of overtopping.
- 8.70 Temporary Culverts – should be designed so that any overtopping is routed such that it re-enters the watercourse downstream of the culvert. In areas of medium/high flood risk the culverts impact on the watercourse should be hydraulically modelled.
- 8.71 Paragraph 4.6.89-90 – drainage at the various stages is necessary, it is not one singular stage.

Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]

- 8.72 SCC would like to know whether Sea Link has been in consultation with SPR on physical testing such as the SPR infiltration undertaken last year to share data. The LLFA is keen that should, in the worst instance, SPR not be able to deliver the Friston substation, good sharing of testing data ensures that repetition is not necessary. This document is good as an initial document but given the availability of real-world testing data for a large part of the proposal, SCC considers this should be integrated if possible.
- 8.73 Paragraph 2.6.1.1 – the site is discharging into an adjacent watercourse, and SCC considers that this merits comment.
- 8.74 Paragraph 2.6.1.2 – there are multiple minor watercourses along the cable corridor to Friston and possibly from Friston to Saxmundham. These are noted in the SPR watercourse crossing documents.
- 8.75 Paragraph 2.7.2 – SCC questions why 1 in 30 is the only return period mentioned in relation to surface water flooding. SCC is unsure as to why the surface water section is so light on detail compared to the above fluvial flood risk. Both should be explored with a similar level of detail.
- 8.76 Figure 2.2 is blurry and difficult to read.
- 8.77 Infiltration testing at the converter station seems to show it might be possible. SCC suspects this is due to ground water level 8.6.2 suggests some infiltration may be possible. It would be useful to have a plan that shows zones where infiltration is possible based on the testing concluded to date.
- 8.78 The Appendix A documentation does not have any drainage information as stated in the text.

Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]*Study Area and Water Environment Receptors – Figure 6.4.2.4.1*

- 8.79 There are several minor ordinary watercourses within the Order Limits areas that have not been included – these can be found in the SPR documentation for the cable route and Friston substation area. It also appears that some of the watercourses identified for temporary discharge and the watercourse for the permanent attenuation features at Saxmundham have not been included on the plan.

Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3

- 8.80 This plan should show the relevant return periods, take into account work such as the BMT report on flood risk in the Friston catchment, and use the latest NaFRA2 data. It would appear that this plan is not using the future 2040-2060 epoch and thus is not representing flood risk over the life of the

development. It is very important that all surface water flood risk figures throughout the entire ES are consistent in what data they are showing.

- 8.81 Permanent infiltration pond is shown but not the attenuation basin Ideally indicative construction compound work should not impact the SuDS. LLFA requests a 1 in 100 return period capability during construction. The plan is not labelled as a figure (4.4.11). SCC requests that the Applicant clarifies on the plan which epoch has been used to avoid confusion at a later date.
- 8.82 Paragraph 4.4.14 – amend text to say Lead Local Flood Authorities at the time of discharge. To ensure surface water development regime is kept up to date with evolving standards.
- 8.83 SCC would appreciate clarification regarding whether the Appendix 1 plans concerning Friston substation assume it is being built out by SeaLink, given that there is only a proposed infiltration pond.
- 8.84 Appendix 1 plans for the converter station show no drainage infrastructure.
- 8.85 The Appendix 1 surface water flood risk plans should be more detailed. Showing the return periods in the legend and noting if it is the construction (up to 2040 epoch) or the permanent (2040-2060 epoch) and what dataset has been used (i.e. NaFRA2). An example of this is the 'OPERATION SURFACE WATER FLOOD RISK (SUFFOLK ONSHORE SCHEME)' (pg.75) that does not appear to use the 2040-60 epoch when assessing the long-term flood risk.

Document 6.3.1.4.A: ES Part 1 Introduction Chapter 4 – Appendix 1.4.A Crossing Schedules [APP-089]

- 8.86 SCC considers it would be useful to have annotated plans showing the locations.

Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]

- 8.87 GG15 – Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. There will be no intentional discharge of site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of an emergency).
- 8.88 GG05 – Correct storage of materials and soils to minimise flood risk is an important topic that should be named.
- 8.89 GG06 – This should include any watercourses that are part of the construction regime, they are an indirect receptor for poor construction management practices.
- 8.90 GG19 – And should not be situated in areas of flood risk or surface water flow paths.
- 8.91 GG26 – Type of fencing should take into account surface water flow paths.

- 8.92 W02 – No topsoil should be stored in surface water flow paths, both mapped and noted on site. Modelling of watercourse culverts to determine flood risk implications for watercourses with a medium/high surface water flood risk. Designed as such that any overtopping is directed back into the watercourse downstream.

Table 7: Summary of local impacts – Geology and Hydrogeology					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative/ Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
7.1	Impacts upon planned or existing minerals development	C / D	Positive	N/A	NPS / NPPF / SMWLP
7.2	Impacts upon planned or existing minerals development	O	Neutral	N/A	NPS / NPPF / SMWLP
7.3	Impacts upon planned or existing minerals development	D	Positive	N/A	NPS / NPPF / SMWLP
7.4	Impacts upon planned or existing waste development	C / D	Positive	N/A	NPS / NPPF / SMWLP
7.5	Impacts upon planned or existing waste development	O	Neutral	N/A	NPS / NPPF / SMWLP
7.6	Impacts upon underlying minerals resources	C / O	Negative	N/A	NPS / NPPF / SMWLP

7.7	Impacts upon underlying minerals resources	D	Neutral	Requirement requiring removal of the development at the end of the consent period	NPS / NPPF / SMWLP
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9 Geology and Hydrology

Policy Context

National Policy

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 9.1 Para. 5.11.19 “Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.”
- 9.2 Para. 5.11.28 “Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.”
- 9.3 Para. 5.15.8 “The Applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation, and construction activities.
- 9.4 Para 5.15.9 The arrangements described and a report setting out sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.
- 9.5 Para 5.15.10 The Applicant is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste³² and ‘Towards Zero Waste: Our Waste Strategy for Wales’³³ and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.”

National Planning Policy

National Planning Policy Framework, December 2024

- 9.6 “223. Planning policies should:

³² See <https://www.gov.uk/government/publications/waste-prevention-programme-for-england-maximising-resources-minimising-waste/the-waste-prevention-programme-for-england-maximising-resources-minimising-waste>

³³ See <https://gov.wales/towards-zero-waste-our-waste-strategy>

- c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas³⁴; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked).
- d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.
- e) safeguard existing, planned, and potential sites for: the bulk transport, handling, and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;”

National Planning Policy for Waste, October 2014

- 9.7 Para. “8. When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:
- the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.
 - the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities and minimises off-site disposal.”

Local Plan Policy

Suffolk Coastal Local Plan

- 9.8 Policy SCLP3.5: Infrastructure Provision, notes that developers should provide evidence of “capacity in the water recycling centre and the wastewater network in time to serve the development”. This policy also states that, where possible, ‘bring sites’ should be included in proposals to encourage recycling and reduce demand on Household Waste Recycling Centres.
- 9.9 Policy SCLP10.1: Biodiversity and Geodiversity, states that developments should positively contribute towards biodiversity and/or geodiversity and adhere to the Mitigation Hierarchy.
- 9.10 Policy SCLP10.3: Environmental Quality, states that development proposals should protect the quality of the environment, minimise pollution and contamination, including land contamination, and seek to improve soils and water quality.

³⁴ Primarily in two tier areas as stated in [Annex 2: Glossary](#) of the National Planning Policy Framework

Suffolk Minerals & Waste Local Plan

- 9.11 Policy MP9 titled “Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials” seeks to safeguard:
- existing, planned, or potential rail heads, wharves or associated storage, handling, or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary, and marine-dredged materials, and.
 - existing, planned, or potential sites for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material.
- 9.12 Policy MP10 titled “Minerals consultation and safeguarding areas” seeks to safeguard:
- a) those Minerals Safeguarding Areas located within the Minerals Consultation Areas identified on the Proposals Map from proposed development in excess of five Ha, and,
 - b) areas falling within 250m of an existing, planned, or potential site allocated in the Plan for sand and gravel extraction.
- 9.13 Policy WP18 titled “Safeguarding of waste management sites” seeks to safeguard:
- a) existing sites and sites proposed for waste management use as shown on the Proposals & Safeguarding Maps.

Neighbourhood Plans

- 9.14 None identified.

Local Impact Assessment

Construction Phase Impacts

Positive

- 9.15 There is potential for the proposed development to stimulate the local economy through the utilisation of locally sourced construction materials, namely sand and gravel, from existing facilities and the requirement for recycling or disposal of waste items.

Neutral

- 9.16 None identified.

Negative

- 9.17 Extraction of sand and gravel resources within parts of the area occupied by the underground cables would not be possible.

Operational Phase Impacts

Positive

- 9.18 None identified.

Neutral

- 9.19 No conflicts with existing minerals and waste facilities.

Negative

- 9.20 Extraction of sand and gravel resources within parts of the area occupied by the underground cables would not be possible over the operational lifetime of the development. Appended Maps show the extent of underlying sand and gravel resources.

Decommissioning Phase Impacts

Positive

- 9.21 There would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.

Neutral

- 9.22 In terms of the underlying sand and gravel resources the majority of the proposed development is not irreversible and removal of the development following cessation of use should be required to restore access to mineral resources.

Negative

- 9.23 None identified.

Required Mitigation

- 9.24 SCC as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.
- 9.25 Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and e) disposal.
- 9.26 Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities. In general, there would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.
- 9.27 In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals.
- 9.28 Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development where possible.
- 9.29 Removal of the development following cessation of use should be required to restore access to mineral resources.
- 9.30 All structures including buildings, foundations, plants, and machinery should be removed within 12 months following the cessation of electrical transmission.

Table 8: Summary of local impacts – Agriculture and Soils					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative / Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
8.1	Impact from surface infrastructure	C / O / D	Negative	Reinstatement of BMV land	NPS EN-1 5.11.12, 5.11.13 / Green Future / NPPF / SCLP
8.2	Impact of underground cables	C / D	Negative	Requirement requiring reinstatement of BMV land	NPS EN-1 5.11.12, 5.11.13 / Green Future / NPPF / SCLP
8.3	Impact of underground cables	O	Neutral	Requirement requiring reinstatement of field drains	NPS EN-1 5.11.12, 5.11.13 / Green Future / NPPF / SCLP
8.4	Impact upon drainage	C / D	Negative	Requirement requiring reinstatement of field drains	NPS EN-1 5.11.12, 5.11.13 / Green Future / NPPF / SCLP
8.5	Impact upon drainage	O	Neutral	Requirement requiring reinstatement of field drains	NPS EN-1 5.11.12, 5.11.13 / Green Future / NPPF / SCLP

10 Agriculture and Soils

Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

“Goals and Targets

- 10.1 5. Using resources from nature more sustainably and efficiently We will ensure that resources from nature, such as food, fish and timber, are used more sustainably and efficiently.

We will do this by:

- 10.2 Maximising the value and benefits we get from our resources, doubling resource productivity by 2050.
- 10.3 Improving our approach to soil management: by 2030 we want all of England’s soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches.”

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 10.4 Para 5.11.12 “Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).
- 10.5 Para 5.11.13 Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.”

National Planning Policy

National Planning Policy Framework, December 2024

- 10.6 “Para 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

Local Plan Policy

Suffolk Coastal Local Plan

- 10.7 Policy SCLP10.3: Environmental Quality, states that the impacts of the development proposals on soils and the loss of agricultural land should be considered.

Neighbourhood Plans

- 10.8 None identified.

Local Impact Assessment

Construction Phase Impacts

Positive

10.9 None identified.

Neutral

10.10 None identified.

Negative

10.11 There would be a reduction in BMV agricultural land available (see Appendix 13), and field drainage would be disrupted.

Operational Phase Impacts

Positive

10.12 None identified.

Neutral

10.13 Assuming field drainage is reinstated following construction, this would not be disrupted during the operational phase.

Negative

10.14 There would be a reduction in BMV agricultural land available (see Appendix 13).

Decommissioning Phase Impacts

Positive

10.15 None identified.

Neutral

10.16 None identified.

Negative

10.17 There would be a reduction in BMV agricultural land available and field drainage would be disrupted.

Required Mitigation

10.18 Areas of best and most versatile (“BMV”) agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning.

10.19 Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning.

- 10.20 The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and mitigation would be required to restore drainage following construction and decommissioning.
- 10.21 A map showing the general distribution of agricultural land classification is appended in Appendix 13.
- 10.22 BMV agricultural land would require reinstatement and remediation to the same standard following construction and decommissioning in areas of underground cabling and following decommissioning in areas with surface infrastructure. Field drainage systems should be replaced as required after construction and decommissioning.

Table 9: Summary of local impacts – Traffic and Transport (including Public Rights of Way)					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative/ Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
9.1	Impacts of construction traffic including AILs and in-combination effects Impacts of construction on Public Rights of Way including diversions, closures, and amenity	C	Negative	Requirement requiring a Detailed Construction Traffic Management and Travel Plan, and a Detailed Abnormal Indivisible Loads Management Plan. A robust PRoW strategy will be required. Further assessment work required on the impacts of traffic and transport including for cumulative effects and improved methodology and . Local highway improvements. Commitments required for monitoring and controls within the Construction Traffic Management and Travel Plan to limit impacts and achieve sustainable travel patterns. Appropriate highway mitigation works where appropriate	NPS EN-1 5.14 / NPPF / SCLP 2.2, 3.1, 7.1, 12.28, 12.29

9.2	Impacts of traffic associated with operation and maintenance	O	Neutral	Minimal traffic impacts	NPS EN-1 5.14 / NPPF / SCLP 2.2, 3.1, 7.1, 12.28, 12.29
9.3	Permanent or temporary loss of vegetation for highway access	C / O	Negative	Robust LEMP which prioritises coppicing / cutting rather than removal.	
9.4	AIL access from port to site. Lack of resilient routes without temporary infrastructure	C / O	Negative	Provision of long-term route by investment in permanent improvements to highway structures.	NPS EN-1
9.5	Long-term impacts on Public Rights of Way including diversions, closures, and amenity	C / O / D	Negative	Robust controls within the PRoW Management Plan. PRoW enhancement where required	NPS EN-1 5.14 / NPPF / SCLP 10.4, 12.28, 12.29
9.6	Impacts of decommissioning traffic	D	Negative	Requirement requiring a Detailed Decommissioning Traffic Management Plan, a Detailed Port Traffic Management Plan, and a Detailed Abnormal Indivisible Loads Management	NPS EN-1 5.14 / NPPF / SCLP 2.2, 3.1, 7.1, 12.28, 12.29

				Plan. A PROW strategy will be required.	
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11 Traffic and Transport (including Public Rights of Way)

Policy Context

Legislation

Road Traffic Regulation Act 1988

- 11.1 The Road Traffic Regulation Act 1988 places a duty on Local Highway Authorities who must (in light of studies into crashes) *take such measures as appear to the authority to be appropriate to prevent such accidents, including the dissemination of information and advice relating to the use of roads, the giving of practical training to road users or any class or description of road users, the construction, improvement, maintenance or repair of roads for the maintenance of which they are responsible and other measures taken in the exercise of their powers for controlling, protecting or assisting the movement of traffic on roads,*

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 11.2 5.14.4 The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development as set out in Section 2.6 of this NPS
- 11.3 5.14.7 The Applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The Applicant should also provide details of proposed measures to improve access by active, public, and shared transport to:
- reduce the need for parking associated with the proposal
 - contribute to decarbonisation of the transport network
 - improve user travel options by offering genuine modal choice
- 11.4 5.14.8 The assessment should also consider any possible disruption to services and infrastructure (such as road, rail, and airports).
- 11.5 5.14.9 If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc.) needed to enhance active transport provision.
- 11.6 5.14.11 Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to:
- reduce the need to travel by consolidating trips locate development in areas already accessible by active travel and public transport
 - provide opportunities for shared mobility

- re-mode by shifting travel to a sustainable mode that is more beneficial to the network
 - retime travel outside of the known peak times
 - reroute to use parts of the network that are less busy
- 11.7 5.14.13 Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.
- 11.8 5.14.14 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:
- control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements
 - make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid ‘overspill’ parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions
 - ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.
- 11.9 5.14.15 The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures. 5.14.16 Applicants should consider the DfT policy guidance “Water Preferred Policy Guidelines for the movement of abnormal indivisible loads” when preparing their application.²⁷¹ 5.14.17 If an Applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the Secretary of State of any obligations or requirements needed to secure the mitigation
- 11.10 5.14.16 Applicants should consider the DfT policy guidance “Water Preferred Policy Guidelines for the movement of abnormal indivisible loads” when preparing their application.
- 11.11 5.14.17 If an applicant suggests that the costs of meeting any obligations or requirements would make the proposal economically unviable this should not in itself justify the relaxation by the Secretary of State of any obligations or requirements needed to secure the mitigation
- 11.12 5.14.18 “A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure, and the Secretary of State should therefore ensure that the Applicant has sought to mitigate these impacts,

including during the construction phase of the development and by enhancing active, public, and shared transport provision and accessibility.

- 11.13 5.14.19 Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below.
- 11.14 5.14.20 Development consent should not be withheld provided that the Applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts.³⁵ In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure.
- 11.15 5.14.21 The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.”

National Planning Policy

National Planning Policy Framework, December 2024

- 11.16 “109. Transport issues should be considered from the earliest stages of plan-making and development proposals, using
- i. a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities;
 - ii. b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;
 - iii. c) understanding and addressing the potential impacts of development on transport networks;
 - iv. d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;
 - v. e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and
 - vi. f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate

³⁵ With attribution of costs calculated in accordance with the DfT’s guidance.

opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.”

- 11.17 “114. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.”
- 11.18 “115. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- i. a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - ii. b) safe and suitable access to the site can be achieved for all users;
 - iii. c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and
 - iv. d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.”
- 11.19 “116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios. “
- 11.20 “117. Within this context, applications for development should:
- i. a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
 - ii. b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
 - iii. c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

- iv. d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
 - v. e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”
- 11.21 “118. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.”

Local Plan Policy

Suffolk Coastal Local Plan

Policy SCLP2.2: Strategic Infrastructure Priorities

- 11.22 “The Council will work with partners such as the other local planning authorities in the ISPA, Suffolk County Council, Clinical Commissioning Groups, Suffolk Constabulary, utilities companies, Highways England, and Network Rail in supporting and enabling the delivery of key strategic infrastructure, and in particular the timely delivery of:
- a) A12 improvements.
 - d) Improved walking and cycle routes.
- 11.23 The Council will work with Suffolk County Council and with the other Local Planning Authorities in the Ipswich Strategic Planning Area to support, through a package of funding sources, a range of new and enhanced sustainable transport measures in and around Ipswich.
- 11.24 3.31 A large proportion of development is focused on the Saxmundham Garden Neighbourhood to enable the delivery of required education infrastructure; utilise the connections provided by the railway station and support the improvements to the A12 proposed as part of the Suffolk Energy Gateway Four Villages bypass. Saxmundham is geographically well placed to provide employment opportunities for the communities in the north of the plan area and improve the connections between Ipswich and Lowestoft. The emergence of Sizewell C Nuclear Power Station will also further support the strategic growth of Saxmundham as a Market Town with a variety of services and facilities.”

Policy SCLP3.1: Strategy for Growth

- 11.25 “The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in the plan area by:
- g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors. “

Policy SCLP7.1: Sustainable Transport

- 11.26 “Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services, and facilities. “
- 11.27 “Development will be supported where:
- a) Any significant impacts on the highways network are mitigated.
 - b) It is proportionate in scale to the existing transport network.
 - c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken.
 - d) It is located close to and provides safe pedestrian and cycle access to services and facilities.
 - e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered secure cycle parking.
 - f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.
 - g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
 - h) The cumulative impact of new development will not create severe impacts on the existing transport network. Development will be expected to contribute to the delivery of local sustainable transport strategies for managing the cumulative impacts of growth. Opportunities to improve provision of or access to public transport, in rural and urban areas will be supported. Proposals for new development that would have significant transport implications should be accompanied by a Travel Plan.
- 11.28 A Travel Plan will be required for proposals for:
- i) New large-scale employment sites.
 - j) Residential development of 80 or more dwellings; and
 - k) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or road network.
- 11.29 In consultation with the Highway Authority, the scale, location, and nature of development will be considered in determining how the transport impacts of development should be assessed. As indicative thresholds a Transport Statement will be required for development of 50 -80 dwellings, and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. Non-residential development will be considered on a case-by-case basis dependent on the volume of movements anticipated with the use proposed.”

Policy SCLP10.4: Landscape Character

- 11.30 This policy states that proposals should allow the development to enhance connectivity to the surrounding green infrastructure and PRow network.

Policy SCLP12.28: Strategy for Saxmundham

- 11.31 “Saxmundham will be enhanced as a market town, employment, and service centre, serving a key role in meeting the needs of its residents, surrounding rural communities and visitors, recognising the opportunities related to the connections offered by the rail and A12 transport corridors.
- 11.32 The strategy for Saxmundham is to:
- b) Utilise opportunities related to the presence of the railway and the proximity to the A12.
 - d) Enhance pedestrian and cycle connectivity around and beyond the town, particularly to the town centre and the railway station. “

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

- 11.33 “Approximately 67.8ha of land for a garden neighbourhood is identified to the south of Saxmundham, which includes land within the parish of Benhall, for an education led development, comprising primary school provision, community facilities, employment land, and open space alongside a variety of residential development. This new development will be delivered through a masterplan approach brought forward through landowner collaboration and community engagement.
- 11.34 Critical to the success of this masterplan will be the integration of the new garden neighbourhood with the existing community of Benhall and Saxmundham, as well as taking into account the location of the site.
- 11.35 The masterplan should be informed by community engagement and include:
- e) Provision of green infrastructure, including informal and formal open spaces, circular walks, and retention and enhancement of the natural features on the site such as trees, woodland, and hedgerows to be incorporated into the layout of the development.
 - q) Provision of a Transport Assessment, with particular regard to the capacity of the B1121/B1119 signalised crossroads.
- 11.36 The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required. Including, but not limited to, water recycling upgrades.
- 11.37 Any necessary off-site transport improvements will need to be provided to the satisfaction of Suffolk County Council”

Neighbourhood Plans

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 11.38 Policy ACT11: New design, states that all new developments should promote walking and cycling routes and integrate into the existing PRow network.
- 11.39 Policy ACT12: Accessibility and Connectivity, states that proposals that include measures to improve connectivity for pedestrians and cyclists will be supported, and any new routes should be accessible for those with mobility impairments and be sensitive to the natural environment in which they sit. Where proposals impact on an existing Public Right of Way, it should be incorporated into the scheme (ideally in a wide and open green corridor), or where diversions/new routes are necessary, these should be at least as safe, accessible, and convenient for users as the initial route.

Saxmundham Neighbourhood Plan

- 11.40 Policy SAX1: General design principles, states that development proposals should “retain existing connections and ensure new connections integrate with existing paths, streets, circulation networks, as well as natural features such as tree groups, hedgerows, and public rights of way”.
- 11.41 Policy SAX5: Improving connectivity, states that development proposals will be supported where they “provide, or contribute to, safe, convenient, and pleasant pedestrian and cycle routes”, and improve connectivity of the PRow network.
- 11.42 Policy SAX6: Public Rights of Way, states that existing PRow should be protected and enhanced, for example via new routes, connections, or improved surfaces/signage. This policy also notes that the existing PRow should be retained (unless there is strong community support for re-routing), or appropriate diversions or new routes should be provided where this is not possible.
- 11.43 Policy SAX7: Parking provision, states that non-residential development should provide adequate parking for intended users to avoid creating parking problems, such as parking on pavements and verges.

Saxmundham Draft Modified Neighbourhood Plan

- 11.44 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states “The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 11.45 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of

major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied.”

Leiston Neighbourhood Plan

- 11.46 Policy TM1: Dedicated Access for Cyclists and Pedestrians states “Proposals to provide dedicated access for cyclists and pedestrians will be encouraged. In particular, the following will be strongly supported:
- i. provision of a dedicated cycle path along Aldeburgh Road as far as Seaward Avenue; and
 - ii. the closure of the Kemps Hill stretch of Valley Road to vehicular traffic; and
 - iii. provision of a dedicated cycle path along Sizewell Road to the Crown Farm junction; and
 - iv. extension of the existing footpath from the Crown Farm junction to the Sizewell Belts walks.
 - v. a cycle path around the perimeter of the Aldehurst farm wildlife mitigation area”
- 11.47 Policy TM2: Highway Capacity at Key Road Junctions states: “Any development on site allocations SA1 to SA4, or on any other sites which generate sufficient movement to justify a transport assessment, will be required to consider through a transport assessment the cumulative transport impact of all permitted and allocated development with significant movements in Leiston on the following junctions:
- i. Waterloo Avenue/B1122
 - ii. B1122/Cross Street
 - iii. Cross Street/Sizewell Road/High Street
- 11.48 Proposals that would result in a severe impact on any of these junctions, individually or cumulatively, will be refused unless the transport assessment includes proposals to mitigate cumulative impacts. Development will be expected to make a proportionate contribution to mitigating impacts, according to what is necessary to grant planning permission.”

Other Relevant Local Policy

Suffolk County Council Local Transport Plan (LTP) 2025-2040³⁶

- 11.49 The fourth Local Transport Plan for Suffolk supports four objectives
- Promoting and supporting the health and wellbeing of all people in Suffolk
 - Strengthening Suffolk's Economy
 - Protecting and enhancing Suffolk's Environment
 - Providing value for money for the Suffolk taxpayer
- 11.50 The Suffolk Climate Emergency Plan is effective to 2030 and provides an important milestone during the life of our Local Transport Plan. The Suffolk Climate Emergency Plan recognises transport contributed 30% of CO2 emissions in 2021 and provides the Low Carbon Transport theme.
- 11.51 Suffolk is host to consented nationally significant energy projects including Sunnica Energy Farm (solar) on its boundary with Cambridgeshire; East Anglia ONE, East Anglia ONE North, East Anglia TWO and East Anglia THREE off the coast of east Suffolk; and Sizewell C nuclear power station on Suffolk's east coast. The construction of these projects is beneficial for Suffolk's economy, and effective and efficient transport planning for material and personnel is essential to prevent potentially negative impacts on communities and natural environments near the project areas.
- 11.52 Further NSIPs are either in the examination process such as this project and Norwich to Tilbury or at an advanced stage of preparation such as LionLink.
- 11.53 The travel and transport related challenges set by the nationally significant infrastructure projects and important facilities like the Port of Felixstowe, must be managed appropriately to ensure their economic benefits are felt by Suffolk's residents, whilst their substantial demands on transport infrastructure are not.
- 11.54 The LTP sets out four priority themes:
- Decarbonisation of Transport
 - A strong, sustainable, and fair economy
 - Health, wellbeing, and social inclusion
 - Creating better places.

Decarbonisation of transport

- 11.55 Applicants are encouraged to provide robust Travel Plans to

³⁶ <https://www.suffolk.gov.uk/asset-library/suffolk-local-transport-plan-2025-2040.pdf>

- Avoid trips
- Shift modes of transport to support active travel and public transport
- Improve fuels by supporting electric vehicles Improve fuels by supporting electric vehicles
- Improve fuels by supporting electric vehicles

A strong, sustainable, and fair economy

- 11.56 A strong, sustainable, and fair economy objectives are
- Collaborate with local planning authorities to secure investment and promote Suffolk's unique character
 - Promote transport infrastructure that unlocks inclusive economic growth
 - Improve network resilience to support economic growth.
- 11.57 Freight can be moved by sea, railway, and highway, so there is opportunity to reduce the proportion of road traffic freight, particularly for abnormal indivisible loads.
- 11.58 SCC promotes suitable routes through its recommended lorry route network³⁷
- 11.59 Suffolk Growth reports on the economic impact of tourism in Suffolk, given Suffolk is a tourist destination. The tourism industry (in 2019) contributed over £2.1 billion to the Suffolk economy, was linked to over forty thousand jobs and generated more than thirty-six million trips to, from and within Suffolk. Much of this is focussed on East Suffolk.
- 11.60 Where transport mitigation is identified the legacy benefits of these should be captures, subject to the Suffolk ratepayers not incurring long term maintenance liabilities.
- 11.61 SCC strongly supports NSIPs providing resilient network access to key energy facilities, noting that neither this nor other recent applications have considered that any commitment beyond temporary fixes to the network are considered necessary. As a result substations and other strategically important energy sites will not be accessible for AILs beyond the construction phase.

Health, wellbeing, and social inclusion

- 11.62 Air quality should be improved and transport related noise pollution reduced where this poses a risk to human health
- 11.63 Applicants are strongly encouraged to ensure that HGV's are compliant with the latest air quality controls.

³⁷ <https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk/recommended-lorry-route-network-map>

- 11.64 HGV movements should be restricted to avoid trips overnight or during weekends, particularly in rural areas with low baseline noise.
- 11.65 Promotion of access to the natural environment and leisure use of Public Rights of Way contributes to positive physical and mental health outcomes and reduces health inequalities.
- 11.66 Improve road safety by adopting Vision Zero.

Creating better places

- 11.67 Objectives are:
- Improve access to passenger transport services and promote projects that improve punctuality and reliability
 - Deliver transport schemes that have a positive impact on our natural and built environments
 - Improve urban and rural rights of way and promote access to Suffolk's countryside
 - Ensure heavy goods and large vehicles are on the most suitable roads
 - Reflect road user hierarchy when resourcing maintenance activities.
- 11.68 Disruption to public transport should be avoided by the Applicant, particularly in rural areas where services are infrequent and poor reliability would have a greater proportional impact on sections of the community.
- 11.69 Closure and diversion of Public Rights of Way shall be minimised by the Applicant to avoid impacts on recreational users but also those for whom the routes are key transport access routes.

Area Transport Plans³⁸

- 11.70 Three plans are of relevance to this project:
- Lowestoft Area Transport Plan
 - Saxmundham and Leiston Area Transport Plan
 - Includes priority for investment for Benhall to Saxmundham Cycle route improvements
 - Woodbridge Area Transport Plan - Includes A12 MRN scheme and sustainable transport improvements
- 11.71 Area transport plans for Suffolk's fifteen main towns provide a greater degree of detail for transport improvements in their respective areas and deliver projects contributing to our Local Transport Plan themes.

³⁸ <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/implementation-plans>

NSIP Supplementary Guidance

- 11.72 SCC has published guidance on the transport aspects relevant to NSIPs³⁹.
- 11.73 The Applicant has been advised of this but has not included it within the documents referred to in the application

*Suffolk Green Access Strategy*⁴⁰

- 11.74 The Strategy sets out Suffolk County Council's plan to improve, maintain, and promote public rights of way and green access across the county. It aims to make walking, cycling, and access to open spaces easier and more inclusive, supporting health, wellbeing, and sustainable travel. The strategy includes actions for better management, community involvement, and integrating green access into new developments, helping to create healthier and more connected communities.

³⁹ <https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf>

⁴⁰ <https://www.suffolk.gov.uk/asset-library/imported/suffolk-green-access-strategy-2020-2030.pdf>

Local Impact Assessment

Local Highway Context

General Description of Network

- 11.75 The A12 is part of the LHA maintained Major Road Network (MRN) and links the A14 at Seven Hills Interchange east of Ipswich to the A47 in Lowestoft. It is a mix of dual carriageways south of Wickham Market designed and built around forty years ago with sections of evolved single carriageway sections unchanged other than through local improvements. It mostly avoids passing through settlements other than the western fringes of Woodbridge, Yoxford and Wrentham and Lowestoft but does pass through smaller villages such as Marlesford, Little Glemham, Stratford ST Andrew, Farnham and Blythburgh.
- 11.76 The A1094 is the main route from the A12 towards Aldeburgh which is a popular tourist destination and as such the road is heavily trafficked throughout the year. This road is also narrow and winding between the A12 junction and Snape crossroads, where it then opens in a straighter, wider road with the exception of the junction with the B1121 which is on a sharp bend.
- 11.77 The road network to the east of the A12 is primarily made up of B, C and unclassified small local roads which are narrow and/or winding in nature. With the exception of some elements of the B1122 between Yoxford and Leiston there has been little improvement to the network. Due to the local environment, they are heavily used by agricultural vehicles, and also recreationally by walkers and cyclists. There are several B class roads linking the local settlements
- 11.78 The B class roads link many of the local settlements such as Saxmundham, Leiston and Aldeburgh to the A12 and each other.
- 11.79 During the examination for EA1N and EA2, SCC and the applicant agreed that neither the B1121 nor the B1119 were suitable routes for construction traffic. That applicant committed to restricting its HGV movements to avoid use of the B1119 and B1121⁴¹. The ExA for those projects noted that the local road network is generally unsuitable for the number and type of construction traffic but was satisfied with the applicant's approach to minimise impacts.⁴²
- 11.80 During and holistic assessment of the construction traffic impacts of projects adjacent to SZC the emergency evacuation routes must be a consideration, for example the B1119 between Leiston and Saxmundham is currently the favoured emergency access route to and from Sizewell B.

⁴¹ See paragraph 36 of <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-005234-8.9%20EA1N%20Outline%20Construction%20Traffic%20Management%20Plan.pdf>

⁴² See paragraph 14.5.10 of <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-009799-EA1N%20Recommendation%20Report%20Vol1%20Ch1-17.pdf>

11.81 Improvements are being made by both SZC and SPR to the network to mitigate the impacts of construction traffic associated with these projects. The key improvements are:

- A12 Marlesford
 - Additional footways to provide continuous path on west side of A12
 - Signalised pedestrian crossing to allow safe crossing of the A12
- A12 Little Glemham
 - Signalised pedestrian crossing to allow safe crossing of the A12
- A12 Two Village Bypass
 - New bypass to avoid pinch points and two villages.
 - Roundabouts at south end (Tinkers Brook) and A12/A1094 Friday Street Junction
 - Limited pedestrian improvements at the Friday Street Junction
- A12 Yoxford
 - Improvements to footways and signalised pedestrian crossing to allow safe crossing of A12.
 - New roundabout at the A12/B1122 junction to reduce congestion, particularly delays for B1122 traffic joining the A12.
- B1122 Early Years
 - B1122 between Yoxford and the SZC main site entrance north of Leiston
 - Road safety improvements such as footways, uncontrolled crossings, road markings, signs, and reduced speed limits
 - Resurfacing to reduce noise and vibration
- B1122 Theberton:
 - Extension of footway on B1122 near manor cottage
 - Uncontrolled pedestrian crossing from near Manor Cottages to Ivy Cottages
 - Short section of footway on west side of Church Road.
- Lovers Lane, Leiston
 - Provision of diverted bridleway with Pegasus Crossing for rights of way users diverted from the coast path and closure of the bridle way through the temporary construction area (TCA)
- Leiston
 - Improvements to the town centre to prioritise sustainable transport
- A1094 Snape:

- Uncontrolled pedestrian crossing and footway outside the church
- Extension of footway outside the petrol station
- Uncontrolled crossing and footway opposite the petrol station.

Sustainable Transport

- 11.82 On the A12 footways are often present on at least one side of the road in many settlements (e.g. Farnham). While generally true these footways are often narrow, below the 1.5m width considered necessary in Manual for Streets for two pedestrians to walk side by side or to pass each other. In many cases the footway is immediately adjacent to the carriageway. Being linear settlements, the services that are present are often on the opposite side to many residents. This requires crossing of the road although formal crossing points are sparse.
- 11.83 On the B class roads provision of footways is at best intermittent and usually absent as are crossings, even informal ones comprising just dropped kerbs. This creates isolation and severance between and within communities if traffic increases.
- 11.84 PRow often start and finish at roads. Where they cross the road, this is not always immediately opposite each other and hence some use of the road network by walkers is necessary to rejoin the PRow.

Construction Phase Impacts

Positive

- 11.85 None identified.

Neutral

- 11.86 None identified.

Negative

Network Resilience

- 11.87 The Councils have raised concerns regarding the resilience of the highway network. The proposals rely on the A12 as the sole HGV route, and most will also use the A14 to access.
- 11.88 The main issues are:
- i. Closure of the A14 Orwell Bridge due to collisions or high winds resulting in traffic being diverted through Ipswich,
 - ii. Closure of the A14 or the A12 (north and south of the A14) and lack of suitable diversions,
 - iii. Capacity of junctions on the strategic and major road networks, particularly if delivery of multiple NSIPs coincide,

- iv. Restrictions placed on the ability to maintain the highway network during normal working hours due to the higher volume of construction movements,
- v. Lack of laybys or other suitable parking, rest, or stopover facilities east of the A12. Except for the A12 north of Seven Hills to Woodbridge and the Wickham Marlet Bypass the local highway network has few laybys suitable for use by HGVs. There is only a single layby (at Eastbridge) on the combined A1094, B1122, and B1069 routes. The existing laybys on the A12 are under considerable stress with the increase HGV movements associated with the SZC and SPR projects. The concerns raised at previous examinations have been experienced with complaints from local residents about antisocial use of laybys and from hauliers regarding lack of areas to take legal breaks.

Network Management

- 11.89 The intended DCO powers in article 13 may inhibit the authority in performing its duties as the local highway authority by removing control on the highway within the 'works' or associated with implementation of the traffic regulations in article 50.
- 11.90 The presence of construction traffic on the network for 7 days a week will hamper routine highway maintenance or increase delays and disruption. The authority may also incur increase costs if forced for operational or safety reasons to undertake more work outside normal working hours.

Road Users

- 11.91 Key issues facing road users include:
 - i. Delay to public transport and other road users including emergency services and public services.
 - ii. Safety, fear, intimidation and severance as constriction traffic impacts pedestrians and cyclists where provision of sustainable transport infrastructure or alternatives and limited.
 - iii. Loss of amenity both on rights of way but also highways used to link or access these.
 - iv. Lack of breaks in construction with seven days a week working

Route Selection

- 11.92 SCC is concerned that the Applicant has not undertaken sufficient assessment of potential access routes to the substation and convertor station. Whilst the proposed Fromus Bridge provides access to the Sea Link Convertor Station, access to the substation is via a temporary haul road during the construction phase and from the permanent access off the B1121 north of Friston during the operational phase. HGV and AIL access to the latter

is through the alignment of the A1094/B1121 junction only possible via Leiston and Knodishall.

Road Safety

11.93 Data taken from CrashMap (<https://www.crashmap.co.uk/Search>) 2020 to 2024 inclusive, and the Traffic and Transport chapter of the Environmental Statement [APP-054]

Number of collisions resulting in injuries

Ref	Site	fatal	serious	slight	SCC comments
S-RJ1	A12/A1094 Junction, Benhall	0	3	5	Discounted as being reconstructed by SZC
S-RJ2	A12/B1121 (South) Junction, Benhall	0	1	0	
S-RJ3	A12/B1119 Junction Saxmundham (N)	0	2	2	Minor SZC works
	A12/B1119 Junction Saxmundham (S)	0	1	2	
	A12 / Carlton Road, Kelsale cum Carlton	0	2	0	Not assessed by Applicant
S-RJ4	A12/B1121 (North) Junction, Kelsale cum Carlton	0	0	0	
	A12/A1120 Junction, Yoxford	0	0	1	
S-RJ5	A12/B1122 Junction, Yoxford	0	0	0	Discounted as being reconstructed by SZC
S-RJ6	B1121 Main Road/B1121 Church Hill Junction, Benhall	0	0	0	
S-RJ7	B1121 Main Road/B1119 Church Hill Signalised Junction, Saxmundham	0	0	0	
S-RJ8	B1121 Saxmundham Road/Grove Road/Mill Road Junction, Friston	0	0	0	
S-RJ9	A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction, Friston	0	0	0	

S-RJ10	A1094 Aldeburgh Road/B1069 Snape Road Junction, Knodishall	0	1	2	Speed limit introduced by SZC
S-RJ11	A1094/B1122 Leiston Road/Church Farm Road Roundabout, Aldeburgh	0	1	1	
S-RJ12	B1122 Aldeburgh Road/B1353 Aldringham Lane Junction, Aldringham	0	0	1	
S-RJ13	B1069 Leiston Road/B1353 Aldringham Lane Junction, Knodishall	0	0	0	
S-RJ14	A1094/Sternfield Road/Church Road Junction, Snape	0	0	1	

- 11.94 The results mirror those submitted by the applicant.
- 11.95 Pedestrian casualties are restricted to urban areas with three slight injuries recorded in Saxmundham, 1 serious and two slight in Coldfair Green/Knodishall. A serious injury involving a cyclist at the A12/B1121 junction at Benhall and a slight injury on the B1121 between Benhall and Saxmundham. In SCC's view the frequency and severity indicates the vulnerability of cyclists when using rural traffic dominated roads with little provision for cyclists. SCC notes that although the applicant has considered large vehicles, they have not considered vulnerable users.
- 11.96 Of the junctions assessed the one of greatest concern to SCC would be the A12/B1119 junction. Although minor improvements are planned by SZC these are only to mitigate their impact. Of concern is the use of this junction by the Applicant when the B1121 is closed at Benhall.
- 11.97 Links of concern would be the B1069 through Knodishall where 3 serious and 3 slight collisions have occurred within the settlement and the B1119 in its rural section between Saxmundham and Leiston where 1 serious and 10 slight injury collisions have occurred. The B1069 does not feature in the Sea Link assessment but they do concur regarding the elevated rate of collisions on the B1119 east of Saxmundham and that the B1121 through Frison also has higher than expected collision rates. This supports SCC's view regarding the unsuitability of the latter two roads as routes for construction traffic. In SCC's opinion the safety issues on the B1119 are due to the combination of reasonably long stretches of straight road where drivers can travel at speed interspersed with severe bends or changes in geometry which catch out the

unwary. Improvements such as removing tight bends could improve safety but would require acquisition of land to do so and come with environmental impacts.

Site Access Points

- 11.98 Whist generic accesses are shown in the Design and Layout Plans [APP-037] no topographic surveys have been undertaken to show that the 2-D layouts work in practice, for example the vertical alignment of the existing highway does not compromise visibility or not features such as service would hinder construction. The highway boundary should be clearly shown as should any land proposed as highway to be adopted by the authority.
- 11.99 The visibility splays are likely to require removal or coppicing of vegetation to achieve. SCC's preference is for the latter for temporary accesses subject to suitable maintenance by the applicant.
- 11.100 Drawing DCO/T/DE/SS/1306 [APP-037] states minimum carriageway widths for safe single- and two-way traffic control. With the restricted widths on many Suffolk roads, including B roads, these may be difficult to achieve. The applicant should also note that temporary traffic signals must have adequate width for traffic to pass at the signal heads.
- 11.101 The Applicant has assumed that where speed limits are present vehicles comply with these and hence are appropriate for design purposes. Experience has shown that this is not always the case and where reduced speed limits be they existing or proposed as part of the project are used for design purposed this should be supported by survey data showing it is effective or physical measures to achieve the same (example S-AP-14 40mph limit to the south [APP-037]).

Junction capacity

- 11.102 The LHA considers that the following are significant junction within the Applicant's study area. The authority notes that there are another junction on the A12 under stress due to capacity particularly from the A12/A1152 Woods Lane Junction, Melton to the A12/A14 Seven Hills Interchange albeit these are within the SCCA12 MRN project. To the north the A12/A144, A12/A145 and A12/A1095 junctions have been areas of concern where capacity constraints while within acceptable flows may experience delays on side roads causing safety issues.
- 11.103 It is noted that the Applicant has only assessed delay at junctions in terms of the IEMA guidance, not through modelling. A concern with the Applicant's assessment is that by only considering delay at two or more limbs this creates a situation where impacts will only be noticeable at crossroads and not where the main route is not constrained by the need to give way.
- 11.104 The junctions for which transport model outputs have been provided in other NSIPs are listed below. This application has not provided any junction

modelling. It is worth noting that whilst the data below was assessed by SCC it should not be assumed that the authority fully accepts these as the information provided did not include any of the traffic surveys, data used to calibrate the junction models or drawings highlighting that the junction geometries used within the model are acceptable. This brings inherent risk to each model and means that the results presented need to be treated with a reasonable amount of caution, above the general risk associated with any transport model.

11.105 Reviewing the available junction modelling the following points are noted⁴³:

A12/ Woodbridge Road/New Road, Bredfield

11.106 Concerns about the traffic queueing on the minor arms of the junction were raised in the SZC DCO and a commitment made to monitor the site during construction. The modelling did not consider other NSIPs other than EA1(N)/EA2.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.51	0.49	55	50
	Early Years	2023	0.69	0.58	106	71
	Peak Year	2028	1.00	1.00	390	445
	Operational	2034	0.48	0.73	44	120

A12/ Bell Lane, Martlesham

11.107 The concern at this junction are the delays on the side arm which albeit an existing problem, are clearly shown to increase as a result of SZC construction traffic. The cumulative impact of other NSIPs other than EA1(N)/EA2 in terms of greatest impact but also duration of impact on the community are not assessed.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)

⁴³ EA1N/EA2 data from <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010077-001404-6.3.26.19%20EA1N%20ES%20Appendix%2026.19%20Junction%20Modelling%20Outputs%20and%20Turning%20Count%20Diagrams.pdf>
SZC data from <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-005601-The%20Sizewell%20C%20Project%20-%20Consolidated%20Transport%20Assessment.pdf>

SZC	Early Years - Base	2023	0.38	0.21	33	28
	Early Years	2023	0.51	0.26	65	45
	Peak Year	2028	0.63	0.38	83	48
	Operational	2034	0.42	0.31	35	44

11.108 A12/A1094 Friday Street: Priority junction being replaced by roundabout. Modelling should use revised configuration.

A12/B1121 Benhall junction

11.109 With SZC traffic this junction is not under stress in terms of capacity or delay. However, the modelling does not include traffic from other NSIPs other than EA1(N)/EA2.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.21	0.24	8	9
	Early Years	2023	0.26	0.33	8	9
	Peak Year	2028	0.27	0.33	9	10
	Operational	2034	0.35	0.26	9	10

11.110 A12/B1119 Rendham Junction: Minor changes are being made to road markings and exit from Rendham side of B1119. Details in SZC DCO. Modelling should use revised configuration.

11.111 SZC modelling shows low RFCs and delays with the exception of J7(S)a, the southern central cross-over, where in the am peak RFC is 0.65 in the 2034 operational with SZC condition and delays of 19 seconds.

A12/B1121 Dorleys Corner Kelsale cum Carlton

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.20	0.24	11	10
	Early Years	2023	0.23	0.24	12	12
	Peak Year	2028	0.22	0.26	12	11

	Operational	2034	0.30	0.25	13	12
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A12/A1120

- 11.112 Additional VISSIM modelling of the A1120 and B1122 junction was undertaken and indicated that improvements to the B1122 junction theoretically improved performance of the A1120 junction. Removal of some traffic by the SLR also contributed to this improvement in the peak and operational years.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.32	0.62	10	12
	Early Years	2023	0.46	0.80	12	24
	Peak Year	2028	0.40	0.76	11	19
	Operational	2034	0.38	0.74	10	17

- 11.113 A12/B1122 Yoxford: Priority junction being replaced by roundabout. Details in SZC DCO. Modelling should use revised configuration.

- 11.114 A12/A144 Bramfield: Changes to junction geometry. Differs from layout in DCO. Modelling should use revised configuration.

A12/B1387 Blythburgh

- 11.115 Changes to junction geometry. Differs from layout in DCO. Modelling should use revised configuration. SZC model shows that the theoretical capacity is sufficient but that queue lengths on the minor arm are a cause for concern. This is exacerbated by seasonal (tourist) peaks.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.06	0.08	18	12
	Early Years	2023	0.07	0.08	18	12
	Peak Year	2028	0.06	0.09	19	13
	Operational	2034	0.06	0.09	17	13

A12/A145

- 11.116 The SZC modelling showed that the junction was performing adequately with acceptable queue lengths. However, the model assumed an 85% south and 15% north split in SZC HGV traffic either side of Yoxford. This has not been realised in practice. The model did not consider additional NSIP projects other than EA1(N)/EA2 nor recent changes to the SZC project such as location of accommodation Pakefield.

A12/A1095 Blyford

- 11.117 Being located just north of the A12/A145 junction the same comments apply. The modelled RFCs are a maximum from 0.49 in the reference year to 0.52 in the operational year and delays no more than 12 seconds.

A12/B112 Wrentham

- 11.118 Concern is the queue length on the side roads. SZC construction traffic increases this to a degree noting that the assumptions made at DCO regarding traffic patterns have changed. Impacts of other NSIPs not considered.

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.33	0.49	19	24
	Early Years	2023	0.42	0.71	21	38
	Peak Year	2028	0.37	0.61	21	34
	Operational	2034	0.38	0.56	21	29

A1094/B1069 Snape Crossroads

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.60	0.67	23	27
	Early Years	2023	0.63	0.69	24	31
	Peak Year	2028	0.68	0.74	29	35
	Operational	2034	0.80	0.77	43	39

A1094/B1121 Friston

- 11.119 No modelling available

A1094/B1069 Knodishall (SPR Junction 3)

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SPR	Existing Layout - Forecast Background	2023	0.38	0.42	13.83	13.73
	Existing Layout - Forecast Background + EA2 Construction	2023	0.42	0.67	16.20	27.09
SZC	Early Years - Base	2023	0.70	0.62	26	23
	Early Years	2023	0.80	0.66	38	26
	Peak Year	2028	0.77	0.78	35	38
	Operational	2034	0.77	0.77	35	38

A1094/B1122 Aldeburgh

11.120 No modelling available.

B1119 Waterloo Avenue / B1122 Station Road/ B1069 Park Hill

11.121 This signalised junction is close to theoretical capacity in the am peak and above in the pm peak. The modelling shows the degree of saturation increases as the SZC scheme progresses.

Project	Scenario	Year	Am Peak (DoS%)	Pm Peak (DoS%)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	80	88	76	81
	Early Years	2023	74	82	72	94
	Peak Year	2028	99	213	86	111
	Operational	2034	176	125	176	125

B1119/B1121 Saxmundham Crossroads

11.122 SZC data shows this signalised junction is already over the theoretical capacity. Improvements have been made to the signals such as retrofitting MOVA. Local knowledge would support the data with significant delays on a

daily basis particularly on the B1119 from the east exacerbated by the presence of the two supermarkets. Although only peak and shoulder hours were assessed there is concern that delays occur throughout the day and therefore should be assessed.

Project	Scenario	Year	Am Peak (DoS%)	Pm Peak (DoS%)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	89%	108%	94	219
	Early Years	2023	89%	120%	94	379
	Peak Year	2028	93%	108%	109	315
	Operational	2034	95%	107%	114	211

11.123 A number of A12 roundabouts south from Woodbridge (A1152) to Foxhall Road, are shown to be at or approaching capacity. However, a planning application for the A12 Major Road Network Scheme is expected to be submitted shortly which intends to address some of these issues through modal shift and targeted highway capacity improvements. It is expected that construction will not start until 2027 and will last approximately two years.

11.124 The mitigation measures implemented by the EA1N, EA2 and Sizewell C projects are detailed in the “Required Mitigation” section of this chapter

Construction Traffic access routes

11.125 Specific issues on the proposed construction traffic access routes are:

a) *A12 Seven Hills to Lowestoft (includes S-RJ1, S-RJ2, S-RJ3, SRJ4; S-RL1, S-RL-2, S-RL3, S-RL4):*

- Poor geometry at Farnham including buildings close to carriageway (this will be mitigated by Two Village Bypass).
- Poor road geometry at Blythburgh (only a potential issue for AILs being brought from Lowestoft).
- Poor safety record at A12/A1094 junction – Works have begun on the Two Village Bypass roundabout at this junction and traffic management has been deployed, significantly lowering traffic speeds. Two Village Bypass is due to be completed by late 2027, which would mitigate this issue.
- Variability in traffic flows with the usual network peaks being overlain by seasonal tourist traffic.
- Concern over delays and road safety caused by increased traffic turning traffic from the A12 onto the B1121 at Benhall and vice versa.

- Varying speed limits along the length of the A12 from Lowestoft down to the A14 at Seven Hills Interchange.
 - Delays causing frustration for drivers exiting minor roads onto the A12 such as the Bredfield / Hasketon and Bell Lane, Marlesford junctions (road safety and delays to local traffic).
 - Poor safety record at the junction with the B1119 west of Saxmundham.
 - A narrow footway between Marlesford to Wickham Market bypass, causing pedestrian anxiety
 - Road safety concerns and delays at the northern junction of the B1121 and A12 known as Dorleys Corner.
 - Capacity restrictions on structures along the length of the A12.
 - Passes through settlements of Marlesford, Little Glemham, Yoxford, Blythburgh and Wrentham.
- b) A1094: A12 Farnham to Aldeburgh (includes S-RJ9, S-RJ10, S-RJ11, S-RJ14; S-RL10, S0-RL11)*
- Poor safety record at junction with A12 - TVB roundabout will be completed by the end of 2027 to mitigate this
 - Poor road geometry - Narrow and winding in several areas, e.g. between River Fromus and Snape
 - Tourist route access to Aldeburgh with significant seasonal variations
 - Concerns over capacity and delay and hence road safety issues at the A1094/B1069 Church Common crossroads, particularly traffic exiting onto the A1094 from Snape.
 - Weight restriction on railway bridge of 46 tonnes
 - Geometry of roundabout at the A1094/B1122 in Aldeburgh where issues relating to movement of articulated vehicles were identified during the SPR examination
 - Poor vertical geometry to the west of Aldeburgh
 - Scattered dwellings with multiple private accesses
 - Poor geometry and visibility at minor road junction
- c) B1121: A12 Benhall to A12 Dorleys Corner (S-RJ6, S-RJ7; S-RL5, S-RL6):*
- The B1121 comprises a number of sections each with differing characteristics and sensitivities:
- A12 to Benhall: Narrow footway and scattered accesses serving local industry and Whitearch Residential Park.

- Benhall Village to B1121 junction: Road skirts the main settlement which contains a school and community centre. Narrow footway is located on the opposite side to the settlement, and no formal crossings are present. Clusters of dwellings are present on the west side requiring residents to cross the B1121 to access the village, as is the case for the bus stops.
- B1121 junction to Saxmundham. No settlement and one business. Narrow footway on west side abutting the carriageway links Benhall to Saxmundham
- Saxmundham. Significant local settlement with main services such as supermarkets, shops, surgery, and schools serving a significant area of East Suffolk. Narrow roads and footways constrained by buildings. Primary school located on Brook Farm Road.
- Kelsale cum Carlton to Dorleys Corner and the A12. Greater spacing to residential and business areas but includes direct access to industrial estates, camping sites, residential clusters, and local road servicing villages such as Kelsale and Carlton. Primary school located on Carlton Road. Although many facilities are not located on the proposed construction access routes many are close and have to be used by vulnerable road users to access them or move within their communities.
- Major concerns over the structural condition of the railway bridge at Benhall.
- Major concerns regarding the traffic signal-controlled crossroads in Saxmundham town centre, including capacity, delay, and geometry.
- Primary School and Community Centre in Benhall
- Height restriction due to railway bridge to the north of Saxmundham Town centre.
- On street parking north of railway bridge in Saxmundham.
- Severance of Benhall from Saxmundham for cyclists and pedestrians due to narrow or absent footways and infrequent informal pedestrian crossings.

d) B1121: from Benhall to A1094 Friston (S-RJ8, S-RL8):

- Poor road geometry and narrow road widths in Sternfield and buildings close to the carriageway that constrain geometry, visibility and are at risk of impact.
- Severance of Sternfield from Saxmundham for cyclists and pedestrians due to lack of footways and narrow verges.
- Restricted road width and bends between Sternfield and Friston.
- New permanent access road into the Friston Substation site from the B1121 north of Friston

- Difficulty in HGVs navigating junction with A1094 at Friston turning to and from the west.
- B1121 passes through centre of Friston and is adjacent to a playground
- Poor visibility at existing junctions e.g. Church Lane Friston.

e) *B1119: Saxmundham to Leiston (S-RL7):*

- Narrow road width in Saxmundham
- On street parking in Leiston and Saxmundham causing delays
- Concern over capacity and delay issues at the signal-controlled crossroads in part associated with two supermarkets in Saxmundham
- Surface water flooding issue near the Saxmundham level crossing
- Poor road geometry in places along the length of the B1119 with several sharp bends and narrow sections

f) *B1069: A1094 Knodishall to Leiston (S-RJ13, S-RL12):*

- Capacity and delay at signal-controlled crossroads in Leiston
- Passes through the village of Knodishall which has limited crossing facilities for pedestrians
- Primary School on Judith Avenue and lack of formal crossing points severing community.
- Narrow footways in Knodishall and Leiston
- Narrow sections including approach to A1094 that is being widened by SPR.

g) *B1122: Yoxford to Theberton*

Note that in part the SLR delivered by SZC will remove most traffic between the new Middleton Link Road and the tie in east of Theberton. Delivery is anticipated late 2027.

- Winding rural road with pinch points
- Scattered residential dwellings and businesses
- Concerns over capacity and delay at two sets of signal-controlled crossroads in Leiston
- Currently also being used by Sizewell traffic prior to the construction of the Sizewell Link Road
- Several pinch points through Leiston, including a level crossing
- Scattered dwellings with multiple private accesses between Yoxford and Leiston

- Multiple minor roads emerging onto the B1122

h) B1122: Theberton to Leiston

- Subject to some improvement by SZC including creation of new roundabout south of Eastbridge serving as a main site access.
- Level Crossings on Abbey and Station Roads carrying trains delivering materials to SZC.
- Narrow footways and lack of formalised crossings in the northern outskirts of Leiston.

i) B1122: Leiston to Aldeburgh (S-RJ12, S-RL13)

- Passes through centre of Leiston where pedestrians and cyclists are common, footways not to newer standards (e.g. LTN 1/20) along a number of signalised junctions with pedestrian facilities are present.
- Primary and Secondary School and Leisure Centre are located a short distance east of the B1122 in Leiston.
- Residential road with parked cars along both sides
- Poor vertical geometry south of Altringham (hidden dips)
- Scattered dwellings with multiple private accesses

B1121 – Benhall Rail Bridge

- 11.126 There are major concerns over the proposed use of the railway bridge at Benhall for the use of construction traffic. There is a weight restriction of 46 tonnes which makes it unsuitable for several of the proposed vehicles needed to access the site via the Proposed Access S-BM09.
- 11.127 There is currently a lack of clarity on the Applicants proposed mitigation measures and their potential impact. These relate to:
- the duration of any road closure
 - temporary traffic management and effects on the A12 junction through backing up of traffic
 - the impact on road users in terms of safety and delay, on residents and businesses on any diversion route,
 - residents and landowners adjacent to the structure especially now the red line has been extended beyond the highway boundary.
 - Protection of and access to buried utilities

- Safety of and access for pedestrians and cyclists on the B1121 and those wishing to use to footway alongside the rail line.
- 11.128 Overbridging requires 3 days of road closures each time the bridge is erected and dismantled. With potentially 7 proposed transformer movements along this route there will be significant delays on the road network, including severance between Saxmundham and the Whitearch Park residential homes. There would also be a significant diversion route through Saxmundham town centre, which has narrow pinch points along the high street and a height restricted railway bridge.
- 11.129 Semi-permanent bridging will require traffic signals once the bridge is in place, which has the potential to cause traffic to queue back onto the A12. Even with a priority signal for traffic coming off the A12, there would still very likely be tailbacks onto the A12 due to the significant increase in traffic here.

Developments in Benhall

Planning Application DC/21/2503/OUT: Land South Of Forge Close Benhall Saxmundham Suffolk: Outline Application with Some Matters Reserved - Erection of up to 41 dwellings (with details of access to be considered).⁴⁴

- 11.130 It is understood that the application has been granted by ESC although the planning website has not been updated. Initially the LHA responded with a holding objection primarily on the grounds of poor sustainable access between the site and Benhall village. To resolve this matter the Applicant has proposed a cycleway along the east side of the B1121 to Forge Close and some minor footway improvements along Forge Close. The uncontrolled pedestrian crossing over the B1121 and adjacent bus stops will have minor improvements but limited in terms of pedestrian and cycling connectivity over the B1121. However, these proposals do not materially improve connectivity nor reflect the increase traffic that will use the B1121 to construct the Sea Link project.
- 11.131 The access into the site has only been assessed in terms of a residential estate, not for large vehicles that may be associated with the Sea Link project.
- 11.132 Timing of the delivery of this site is unknown but any traffic management on the B1121 at Benhall Rail Bridge would adversely affect access either during construction or when occupied.
- 11.133 This site is not included in the list of committed developments in the Traffic Assessment Note [APP-122]

⁴⁴ <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=QTGPYQXKQ00>

Planning Application DC/24/4367/FUL: Change of Use From Agricultural Land to Dog Walking and Exercising Facility and Formation of Vehicular Access⁴⁵

- 11.134 Construction of the site access commenced in November 2025. The proximity of this access and impacts on Sea Link’s proposed access to the Fromus Bridge have not been assessed.

Pedestrian and Cycle Improvements, Benhall and Saxmundham

- 11.135 SCC, in partnership with Benhall Parish Council and East Suffolk Council are prompting improvements in Benhall. These comprise:
- i. Modal filters on School Lane to prevent through vehicular traffic and promote sustainable transport (subject to consultation on traffic regulation order)
 - ii. Improvements to the uncontrolled crossing adjacent to the B1121/School Lane junction to allow safer access across the B1121 and upgrading the footway to a shared use cycle route to make the route from School Lane to Saxmundham suitable for cyclists.
 - iii. Creation of a surfaced bridleway in the field west of the B1121 between the B1121 Sternfield Junction and Saxmundham subject to agreement by the landowner to provide a safe amenable route screened from the carriageway.
- 11.136 Funding has been agreed for preliminary design work, and this has commenced. Financial support for delivery is also agreed in principle but is subject to final construction and ancillary costs. The project has been developed without consideration of the Sea Link (or LionLink) construction traffic.

Abnormal Indivisible Loads

- 11.137 As LHA, SCC is committed to maintaining its stock of bridges to enable use by normal highway traffic as far as reasonably practical with the available funding. This excludes AILs >44 tonnes in weight.
- 11.138 SCC understands that details of the AIL movements remains to be confirmed but are assumed to be:
- i. 80 Cable drum movements (40 in and 40 out, will require a police escort)
 - ii. 7 Transformers (will require police escort)
 - iii. 30 other AILs (15 movements in and 15 movements out, likely to be cranes, piling rigs. No dimensions given at this stage and not clear if they will require an escort).

⁴⁵ <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?previousCaseType=Application&keyVal=SO17DVQXG7200&previousCaseNumber=DC%2F25%2F2031%2FDRC&activeTab=summary&previousKeyVal=SWM02HQXH100>

- iv. Expected movement period for AILs: Q3 2028 – end of Q1 2029.
 - v. Port not yet confirmed but anticipated to be Lowestoft.
- 11.139 The overarching National Policy Statement for Energy (EN-1) identifies Traffic & Transport, including abnormal loads generated during the construction phase, as an impact where the Secretary of State recognises the need for appropriate mitigation to ensure satisfactory arrangements in consultation with network providers and the responsible police force. SCC expects this principle to be reflected in the identification and securing of appropriate developer funded highway and police resources.
- 11.140 The nature of the local highway network required police escort particularly where:
- i. The roads are narrow, or the geometry requires a load to move into the oncoming lane. The movement of wide and long loads is problematic on the existing constrained local road network, particularly on B class roads where the road widths are in places less than 5.5m wide; the width considered necessary for two HGVs to pass (Manual for Streets) on a straight road. Where wide or long loads straddle centrelines, particularly those where no overtaking restrictions are present require escort by the police.
 - ii. Special order Loads and others where deemed necessary by the constabulary. For SZC a matrix was developed to formalise this.
 - iii. Special restrictions apply to structures such as prevention of other vehicles using the road when loads are passing over bridges (e.g. A12 Little Glemham).
- 11.141 Thus, NSIP developments create heightened demand for police escorted Abnormal Indivisible Loads (AILs) during construction. Suffolk Constabulary does not have a dedicated AIL team, and escorts are currently provided on an overtime basis when capacity allows. Therefore, where sustained demand is identified a bespoke solution - such as a dedicated AIL team - may be necessary, subject to appropriate lead-in time and developer funding.
- 11.142 AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special-Order weight restriction.
- 11.143 SCC provides details of how it expects this process to be undertaken to applicants.
- 11.144 Despite advice provided to the Applicant by SCC no assessment has been undertaken on the capacity of structures to carry the special-order loads between the SRN or a port and the site.

- 11.145 Work undertaken by SZC has resulted in restrictions being placed on structures along the A12 corridor between Seven Hills and Lowestoft and the B1122. Note that structures on other roads such as the B1121, B1119, A1094 and B1069 not used by SZC have not yet been assessed.
- 11.146 The following restrictions for AILs are in force on the A12 corridor.
- i. A12 - (151) Black Arch Wrentham – STGO1
 - ii. A12 - (746) Little Glemham – STGO1
 - iii. B1121 - (1717) Benhall Rail Bridge – STGO1
 - iv. A12 - (1016) Darsham Dip – STGO2
 - v. A12 - (642) Blue Arch Wrentham – STGO2
 - vi. A12 - (1334) Kelsale Culvert - STGO2
 - vii. A12 – (1123) Latymere Dam South – STGO2
 - viii. A12 – (1094) Kessingland Ped UP – STGO2
 - ix. A further 45 Structures are restricted to STGO3
- 11.147 The Applicant is strongly recommended to engage with SCC to determine a program of reviews, inspections and assessments to identify feasible routes for AIL to this project.
- 11.148 SCC expects the Applicant to work in partnership with other developers during the structural review and commit to assisting with long term maintenance of AIL routes to energy sites in Suffolk.
- 11.149 It is understood that the River Fromus Bridge and B1121 will also be the access route for Lion Link, but no causative impact has been assessed for worker traffic, HGVs and AILs if there is any overlap in the project. Specifically, for AILs the consequences and implications of repeated installation of a temporary bridge over the Benhall Rail Bridge has not been considered.
- 11.150 In the long term the resilience of the route over the B1121 and River Fromus Bridge for AILs during the operational phase has not been considered, nor the long-term access over the A12 from either Ipswich or Lowestoft. For example, special order movement originating from Ipswich West Bank require overbridging of the A137 Ostrich Creek in addition to restrictions on the A14 Orwell Bridge.
- 11.151 The Councils note that the by scoping out all transport issues from the operational phase, the Applicant considers that it is unlikely that any future special-order movements will be required after completion. The Council considers that this is unwise and does not consider movements required during decommissioning or if other projects come forward requiring extension of the substation.

Benhall Railway Bridge

- 11.152 The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits.
- 11.153 Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. SCC understands that temporary overbridging would require the Benhall Bridge to be closed for at least three days for each AIL movement. This approach would significantly hinder access between the A12 and Saxmundham, likely leading to significant effects on road user delay and on the capacity of diversion routes. It is essential for the impacts of this approach to be assessed by the Applicant should it seek to gain development consent with this option for AIL deliveries retained.
- 11.154 With the current restrictions and potential for substantial adverse impacts, this route would not be resilient for long term access to the Saxmundham converter station site, and The Council considers there are serious concerns regarding deliverability.
- 11.155 The Council considers that action is required to provide more detailed information regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.

Environmental Assessment Methodology

- 11.156 In addition to issues around the scope of the assessment and junction modelling discussed in this section, SCC has other concerns over the assessment methodology used with the application.
- 11.157 Typically, in this part of Suffolk local roads connect nodes of settlement resulting in significant differences to the character of the highway, for example sections of open road with few junctions, dwellings or businesses between clusters of houses. Services such as schools and community centres are located off, but close to, routes but away from parts of the settlement proposed for construction traffic requiring local residents to cross these routes.
- 11.158 In response to the project's statutory consultation in December 2023, SCC raised concerns regarding the cumulative impact of NSIPs including Sea Link

on the transport network including areas outside the scope considered by the Applicant.

- 11.159 Traditional assessments for DCOs such as the IEMA guidance are useful tool for assessing the construction traffic impacts albeit the focus is on regionally significant impacts. As a result, the fine detail of local impacts such as the small communities in Suffolk can, in SCC's opinion, be lost. SCC consider this has been the case with the Sea Link assessment where sections of road have been treated as uniform when there are significant differences in sensitivity. Also, that whilst small in terms of national scale this impact can have a major impact on such small communities. An example would be the B1121 from the A12 south of Benhall to the A12 at Dorleys Corner. This, in SCC's opinion, forms a number of discrete sections:
- i. A12 Benhall to the junction with the Church Hill B1121 towards Sternfield. 40mph speed limit. Narrow footway on one side. Primary School located in Benhall. Scattered roadside development including businesses and dwellings. Number of minor and one B road junction. Limited informal crossing points but significant need to crossroad as main residential areas on opposite side of road to footway.
 - ii. B1121 Church Hill junction to South Entrance. No roadside development. De-restricted until Church Hill junction. Narrow footway immediately adjacent to carriageway. Moderate use by pedestrians and cyclists. No formal crossing points nor reason to do so.
 - iii. Saxmundham Town to Brook Farm Road. 30mph speed limit but geometry reduces actual speeds. High pedestrian and cycle use. Narrow but continuous footways. Formal and informal crossing points. Shops, dwellings and businesses in close proximity to carriageway.
 - iv. B1121 from Saxmundham to north of Bridge Street Kelsale: 30mph limit but wide straight road may make compliance difficult. Significant but including Primary School located off Carlton Road and intermittent roadside development including industrial, residential and tourist facilities. Reasonable quality footways on one side or both. Moderate pedestrian and cycle use
 - v. B1121 to Dorleys Corner. 40mph speed limit. Intermittent roadside development. Narrow metalled footway throughout. Limited pedestrian and cycle movements. No formal crossing points but limited need.
- 11.160 The assessment methodology used within the DCO submission relies heavily on IEMA assessment method. At previous consultation stages the Councils raised the use of this method as problematic given that it can often fail to fully assess the specific transport-related impacts of development. The IEMA guidance is one method of analysing the impacts in terms of risks to receptors. However, it is considered to be a coarse tool which does not sufficiently allow for factors such as junction geometry, design guidance (e.g.

visibility) and most importantly the changes in traffic and driver behaviour. Assumptions made for strategic roads considered in the Design Manual for Roads and Bridges may also not be applicable to local roads which will not have been designed to such standards and are unlikely to have facilities for pedestrians found on such roads.

- 11.161 The locations where SCC's opinion differs with regard to sensitivity tends to be the small settlements on B roads, for example Benhall, Sternfield, Kelsale cum Carlton, Friston, and Knodishall.
- 11.162 In SCC's view the cumulative impacts have also been underestimated. This is discussed elsewhere.

Diversion Routes

- 11.163 The diversion routes in 2.7 Access Rights of Way and Public Rights and Navigation Plans [AS-011] have not been agreed with the Highway Authority. Some such as diversion B1121 traffic via the B1119 Rendham Road are unstable due to width, gradient and the level crossing. That for Grove Road, Friston showing use of Church Road is wholly inappropriate due to the narrow width and poor visibility at the junction with the B1121.

Damage Through Exceptional Use

- 11.164 Condition surveys will be undertaken by the contractor both prior to the commencement of construction and subsequently at a point close to the completion of construction to identify existing highway defects and any changes following completion of the proposed project. The methodology and scope of surveys will be agreed between the contractor and SCC prior to commencement of construction.
- 11.165 Any damage (the scope of which will be agreed with SCC and the contractor) to the highway caused by construction traffic will be repaired by the contractor or a financial contribution made to SCC to cover the cost of remedial work.
- 11.166 The Highway Authority may also accrue additional costs if the volume of construction traffic requires routine and planned maintenance works to be undertaken overnight to avoid disruption. The Highway Authority would look to recover these additional costs.

Intra-Project Cumulative Effects

- 11.167 The Applicant considers that no permanent effects on residential properties (in terms of physical changes or disruptions to residential communities) within the study area are anticipated during the construction phase that would affect the social environment or community cohesion in these settlements. Hence, health and wellbeing from construction activities was deemed to have a Minor adverse (not significant) effect upon residential receptors. SCC is concerned that the intra-project impacts seem to relate to the residential receptors without including others such as pedestrians,

cyclists and other road users. The assessment methodology focusses on large scale regional impacts and in SCC's view underestimates the impacts on individuals and small communities typical in this part of Suffolk.

- 11.168 It is noted that impacts on B roads and local road network are considered by the Applicant to be major adverse to moderate adverse, but no mitigation is proposed.
- 11.169 The intra-project cumulative impact assessment [APP-059] in 12.2.2 states that there will be some adverse impact on transport users with no mitigation confirmed. Mitigation or appropriate compensatory measures must be implemented in relation to these impacts:
- i. *Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor the combination of all these impacts could have a significant effect upon transport users. No mitigation has been confirmed at this stage.*

Inter-Project Cumulative Effects

- 11.170 In its relevant representation (paragraphs 31-33), SCC raised concerns over the cumulative effects of the project in combination with other major infrastructure schemes being constructed in the area such as Sizewell C, EA1N and EA2. SCC also raised these concerns in response to the project's statutory consultation.
- 11.171 The Applicant's cumulative effects assessment only refers to a select number of locations and not the cumulative impact on the A12 between Seven Hills and Lowestoft. The LHA has concerns regarding the additional construction traffic in combination with other NSIPs creating delay and safety issues specifically at junctions such as Bell Lane, Marlesford and Bredfield Road, Bredfield where frustrated drivers may take chances joining the A12 in smaller gaps in the traffic.
- 11.172 Proposed or consented development which should be included in the cumulative effects assessment for traffic and transport purposes include:
- 11.173 Significant residential development is under construction in the area with 2,000 homes at Brightwell Lakes at Martlesham and planned residential growth south of Saxmundham and off Humber Doucy Lane east of Ipswich.
- 11.174 A number of solar farms consented through the Town and Country Planning Act are either being built or in the decision-making processes. For instance, the solar farm at Kelsale
- 11.175 SCC has submitted a planning application for the A12 Major Road Network Scheme between Woods Lane, Melton and the A12/A14 Seven Hills Interchange and is consulting on active travel projects in Ipswich and Melton. This is likely to overlap temporally with the construction period of Sea Link creating further impacts on the A12. Whilst this area lies outside of Sea Link's study area, much of the project's construction traffic will use the A12 south of

Woods Lane meaning there will be in-combination adverse effects from the projects on this part of the A12 for road users.

- 11.176 Key areas of cumulative interproject impact are considered to be:
- i. A12 Seven Hills to Lowestoft: Sea Link, SZC, EA1N, EA2, Lion Link
 - ii. A1094 Friday Street to B1069 Knodishall: Sea Link, SZC (light traffic), EAN1, EA2, Lion Link
 - iii. A1094 from B1069 Knodishall junction and B1122 to B1353 Aldringham: Sea Link, EA1N, EA2.
 - iv. B1069 from A1094 to Knodishall: Sea Link, SZC (light traffic), EAN1, EA2, Lion Link
 - v. B1121 from A12 to River Fromus Bridge: Sea Link, Lion Link
 - vi. B1121 to Saxmundham and B1119 towards Leiston: Sea Link, Lion Link
 - vii. B1122 from Yoxford via Leiston and B1069 and B1121 to Friston (ALL only): Sea Link, EA1N, EA2, Lion Link
- 11.177 SCC also has concerns with how the Applicant has assessed the cumulative effects of the proposed development with other NSIPs in the area.
- 11.178 The Sea Link programme overlaps with EA1N and EA2, with all projects utilising the same proposed substation at Friston. Sea Link is proposed for construction from 2026 – 2031, with EA2 currently underway and EA1N to follow completion of EA2. This will result in a significant increase in traffic, particularly HGVs, around the Friston and Saxmundham areas.
- 11.179 The Sizewell C project is also under development and has significantly increased the amount of traffic in the local area, particularly along the A12 and B1122 (which is the main access route to the site). Several Sizewell C off-site developments will also be impacting local traffic, including construction of the Friday Street, Yoxford and Stratford St Andrew roundabouts on the A12, the Two Village Bypass, Sizewell Link Road and the Northern and Southern Park and Rides (at Darsham and Wickham Market respectively), although SCC remains hopeful that these will all be completed before Sea Link commences construction.
- 11.180 Future projects in the local area include Lion Link, which is currently at the pre-app stage, and Helios which we currently have no information on other than the location (Friston). Whilst the overlap of these projects with Sea Link will be less than those of EA1N, EA2 and SZC, there is still potential for an even more significant increase in traffic. This is particularly true with Lion Link, which is potentially going to be submitted to the Planning Inspectorate in Q1 2026.
- 11.181 Experience from data with SZC and EA2 is that significant pressure is being put on the capacity of laybys and rest areas for HGVs leading to complaints from both local residents and hauliers. There is a shortage of welfare facilities

for HGV drivers, and the Applicant is strongly recommended to provide such facilities and parking for legal breaks at all large site compounds.

- 11.182 Much emphasis is placed on peak traffic from projects such as SZC, EA1(N) and Lion Link not overlapping with Sea Link, but this is not evidenced. NSIPs under construction within East Suffolk and likely to overlap with delivery of this project (if consented) are EA1(N), EA2 onshore works and construction of Sizewell C.
- 11.183 It is noted that one of the peaks in construction traffic associated with EA1(N) and EA2 relates to removal of the haul road at the end of the project. The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables' EA1N and East Anglia THREE ("EA3") will still be within their construction phase and Lion Link may also commence within this period.
- 11.184 By assuming that any peak periods will not overlap, the cumulative effects assessment for SZC seems to concentrate on the construction of the highway works associated with the project and not the worker movements to and from the main site. In a similar way, the construction of residential sites are considered but not traffic arising from its intended use.
- 11.185 Initial calculations from data available from this application, SPR and SZC indicate that in combination the schemes would increase HGVs on the A12 by around 150% from the 2028 base or if SPR is excluded around 120%.
- 11.186 No traffic data is provided in the application to summate traffic arising from background use, EA1(N) / EA2 and SZC traffic on the A1094 between the A12 and B1069 in terms of environmental impact or congestion. The LHA raises concerns regarding the delays at traffic turning out of the B1069 from Snape, particularly at peak periods such as the holiday season or when events are held at Snape Maltings.
- 11.187 In terms of impact, it is forecast that the HGV movements associated with Sea Link will peak at 173 deliveries (346 two-way movements) as shown in table 7.26 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This compares with 210 two-way HGV movements for SPR EA1N or EA2 (Scenario 2 sequential delivery) or 700 two-way HGV movements for SZC in the peak year. For these projects the Applicant accepted the need to undertake sensitivity testing on the cumulative impacts of the projects which modified the form of mitigation proposed.
- 11.188 The impacts on junction capacity and delay on the A12, in particular, have not been considered in Table 7.6 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. By placing emphasis on delays on 2 or more arms of junction this automatically dismisses impact on through junctions where only one or two arms that give way to free-flowing major roads.

11.189 In the Transport Assessment Note [APP-122] the developer is correct that no HGVs arising from this project are assumed to use the Sizewell Link Road (when complete) and B1122 but has not considered that light vehicles associated with the project are not so restricted and a proportion will use this route as will special order AIL movements to and from the B1121 Friston access.

11.190 SZC has projected the following vehicle movements of which the HGV daily numbers are capped:

Early years (2024-2027)

11.191 600 HDV two-way movements equivalent to 300 deliveries (heavy delivery vehicles, all vehicles >3.5tonnes including buses) restricted to the A12. SZC estimated that 15% of these will route north of Yoxford and 85% from the south (i.e. A14).

Peak Years (2028-2030)

11.192 At the estimated peak years, the number of HGVs (>3.5 tonnes) will be 700 two-way movements restricted to the A12, B1122 and SLR with and additional buses shuttling between the park and rides and main site again via the A12, B1122 and SLR.

11.193 The impact assessment presented in the ES considers the proposed EA1N and EA2 projects under two construction scenarios:

- i. Scenario 1 - the proposed EA1N and EA2 projects are built simultaneously; and
- ii. Scenario 2 - the proposed EA1N and EA2 project are built sequentially.

11.194 As EA1(N) was unsuccessful at the recent energy bids the projects are being delivered sequentially (i.e. scenario 2)

11.195 With the application of an employee to vehicle ratio of 1.5, the number of daily light vehicle arrivals would be 220 for the proposed East Anglia TWO project (scenario 2) and 271 light vehicles associated with the simultaneous construction Outline Travel Plan 7th June 2021 Applicable to East Anglia TWO Page 9 of the proposed East Anglia TWO and East Anglia ONE North projects (scenario 1).

11.196 Data for the Sea Link project, provided in table 5.1 and 5.2 of the OCTMP [AS-008], indicates a maximum of 173 HGV arrivals and departures (i.e. 246 two-way HGV movements) in 2027 and a maximum of 502 combined worker and LGV movements in 2028. This is comparable with the SPR projects.

11.197 The proposed project, in combination with Sizewell C, EA1N and EA2, will:

11.198 result in a significant increase in HGV movements on the A12, potentially both to the north and south of Saxmundham.

- i. exacerbate pre-existing issues along the A12 route.

- ii. result in SPR traffic from the south traveling through the four villages (Marlesford, Little Glemham, Stratford St Andrew and Farnham, with negative impacts on air quality, noise, severance, road safety and congestion, especially the pinch point at Farnham bend where large loads manoeuvre very close to buildings.
 - iii. Increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1069, B1122, B1121.
 - iv. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.
 - v. increase HGV movements along the A12, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.
 - vi. reduce the attractiveness of core strategic routes, such as the A12, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads.
 - vii. increase wear and deterioration of roads and structures due to the additional traffic.
- 11.199 By comparison, table 13.31 of the inter-project cumulative effects assessment [APP-060] only assesses the cumulative effects of Sizewell C and Sea Link in terms of pedestrian severance and delay and fear and intimidation for a limited selection of receptors. This can partially be explained by the Applicant's limited study area which, SCC has argued, does not fully capture the impacts of the project. The evidence presented by SCC in this section strongly suggests that the Applicant's assessment does not reflect the likely cumulative effects of Sea Link and Sizewell C. The considerations and evidence presented by SCC should therefore be reflected in this assessment. A similar sentiment applies to the Applicant's cumulative effects assessment of other projects such as EA1N and EA2 in addition to projects excluded from the assessment as set out previously in this chapter.
- 11.200 The proposed project, in combination with Sizewell C, EA1N and EA2, will:
- i. result in a significant increase in HGV movements on the A12, potentially both to the north and south of Saxmundham.
 - ii. exacerbate pre-existing issues along the A12 route.
 - iii. result in SPR traffic from the south traveling through the four villages (Marlesford, Little Glemham, Stratford St Andrew and Farnham, with negative impacts on air quality, noise, severance, road safety, and congestion, especially the pinch point at Farnham bend where large loads manoeuvre very close to buildings.

- iv. increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1069, B1122, B1121.
- v. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.
- vi. increase HGV movements along the A12, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.
- vii. reduce the attractiveness of core strategic routes, such as the A12, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads.
- viii. increase wear and deterioration of roads and structures due to the additional traffic.

11.201 By comparison, table 13.31 of the inter-project cumulative effects assessment [APP-060] only assesses the cumulative effects of Sizewell C and Sea Link in terms of pedestrian severance and delay and fear and intimidation for a limited selection of receptors. This can partially be explained by the Applicant's limited study area which, SCC has argued, does not fully capture the impacts of the project. The evidence presented by SCC in this section strongly suggests that the Applicant's assessment does not reflect the likely cumulative effects of Sea Link and Sizewell C. The considerations and evidence presented by SCC should therefore be reflected in this assessment. A similar sentiment applies to the Applicant's cumulative effects assessment of other projects such as EA1N and EA2 in addition to projects excluded from the assessment as set out previously in this chapter.

Successive Interproject Cumulative Impact

- 11.202 The impacts on junction capacity and delay on the A12 in particular, have not been considered in Table 7.6 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport. By placing emphasis on delays on 2 or more arms of junction this automatically dismisses impact on through junctions where only one or two arms that give way to free-flowing major roads.
- 11.203 Whilst at least some of the east coast NSIPs will be delivered at the same time with overlapping cumulative transport impacts there will also be a cumulative impact through repeated successive projects impacting on specific geographical areas.
- 11.204 Examples would be:
 - i. Long durations of construction traffic on local roads from successive projects (e.g. B1121, A1094, A12)
 - ii. Repeated closures, traffic restrictions and diverted traffic (e.g. B1121, B1119)

- iii. Prolonged environmental impacts from construction traffic noise and vibration from successive 7-day week worked projects (e.g. Sea Link, Lion Link)
- iv. Disruption to Public Rights of Way network including repeated closure, diversion, or loss of amenity benefits.

Construction Traffic and Transport Conclusion

11.205 In summary, the proposed application will in the construction phase:

- i. result in a significant increase in HGV movements on the A12 between Ipswich and Lowestoft, particularly when considered in combination with other concurrent NSIPs.
- ii. result in construction traffic traveling through the villages on the A12 (Marlesford, Little Glemham, Yoxford, Blythburgh, Wrentham) and settlements within East Suffolk (Snape, Friston, Benhall, Sternfield, Saxmundham, Kelsale, Aldeburgh, Leiston, Knodishall) with negative impacts on air quality, noise, severance, road safety and congestion.
- iii. increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1121, B1119, B1122 and B1069
- iv. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.
- v. increase HGV movements along the A12, A1094, B1121, B1119, B1122 and B1069 reducing the attractiveness of the routes for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.
- vi. increase wear and deterioration of roads and structures due to the additional traffic

Public Rights of Way

- 11.206 There are potential impacts from construction traffic, construction activities, port traffic, abnormal indivisible loads, and upon PROW.
- 11.207 The Council notes that the sequential construction of NSIPs on the east coast (i.e. EA1, EA3, EA1(N), EA2, Sizewell C and potentially Sea Link and LionLink) will impact communities on a recurring basis. This will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PROW users, in addition to local residents. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.
- 11.208 Working hours covering 7 days a week could have a detrimental effect on the Public Rights of Way network, with peak usage at weekends, including bank

holidays. Consideration should be given to the impact of these working hours on tourism for the area.

- 11.209 In transport terms, the Council is not content with the inclusion of Sundays and Bank Holidays as working days. Such working practices would mean that communities would not have relief from construction traffic for the full duration of the project.
- 11.210 The Applicant's intra-project cumulative effects assessment [APP-059] references significant effects on PRowWs, including 491/010/0, with no confirmed mitigation. SCC does not consider this to be acceptable. Appropriate mitigation should be secured for significant effects. If this cannot be achieved, then, following the mitigation hierarchy, appropriate compensatory measures should be undertaken.
- 11.211 In Part 2 Suffolk Chapter 10 [APP-057], paragraphs 10.9.35, 10.9.56, 10.9.63, 10.9.69, 10.9.76, 10.9.79, 10.9.88, the Applicant states for several PRowWs, up to 20 HGV movements an hour to not be significant. This equates to approximately one every 3 minutes. SCC PRowW does not consider that this is not significant especially on bridleways, where horses, pedestrians and cyclists will be using the routes. The British Horse Society guidance on construction sites and horses (see Appendix 14) highlights horses' reactions to machinery and new things and supports SCC's concerns on the 20HGVs per hour on PRowWs, especially bridleways.
- 11.212 In Part 2 Suffolk Chapter 10 [APP-057], paragraphs 10.9.87 – 10.9.90 claim the effect on Footpath 491/005/0 to only be minor adverse. SCC PRowW queries the minor adverse effect upon the PRowW when it is permanently diverted and permanently extinguished, lined with site fencing, has vehicle crossing points and has vehicles crossing every 3 minutes. The user experience will be changed greatly which is not captured by the classification of a minor adverse effect. The assessments of these footpaths should be reviewed and appropriate mitigation reflected in the PRowW Management Plan.

Operational Phase Impacts

- 11.213 Operational phase traffic and transport effects are scoped out of the ES, but operational phase effects on Public Rights of Way are scoped in.

Positive

- 11.214 None identified.

Neutral

- 11.215 On the assumption that no major replacement works are required, no traffic and transport impacts are identified.

Negative

- 11.216 Permanent diversion of PRoW E-354/006/0 (S-P9) and PRoW E-491/005/0 (S-P15) are expected.

Decommissioning Phase Impacts

- 11.217 Decommissioning impacts have been predicted using the assessment of the construction phase.

Positive

- 11.218 None identified.

Neutral

- 11.219 None identified.

Negative

- 11.220 There are potential impacts from decommissioning traffic, port traffic, abnormal indivisible loads, and upon PRoW.

Required Mitigation

- 11.221 The Council considers that the proposals are inadequate in several ways as have been set out in this chapter. In relation to these problems, SCC considers that the application should be amended with appropriate mitigation measures to make it acceptable in highways terms. SCC's outstanding concerns from a traffic and transport perspective can be summarised as follows:
- a) Proposed working hours give no respite to local community and highway network
 - b) no provision for a planning obligation to cover the cost of necessary highways works.
 - c) the assessment of structures to demonstrate a feasible route for abnormal loads is lacking.
 - d) insufficient details have been provided to demonstrate how AILs will be able to pass over the Benhall Rail Bridge and what the impacts of these measures will be.
 - e) Lack of mitigation within a number of communities adversely impacted by construction traffic
 - f) Use of the B1121 and B1119 as construction routes when it was accepted in the EA1(N), EA2 and SZC examination that these routes are unsuitable.
 - g) Absence of capacity assessments at specific junctions shown to experience significant delays

- h) Lack of cumulative impact assessment of traffic associated with NSIPs in East Suffolk that are likely to be delivered concurrently with Sea Link including impacts on the A12 between Ipswich and Lowestoft
- i) there are too many variables around other energy projects to make the assumptions reliable.
- j) Additional controls required in CTMP to ensure impacts do not exceed those assessed

Intra-project mitigation

11.222 Specific locations for mitigation include:

- i. B1121 Benhall: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety
- ii. B1121 Sternfield: Safety measures to reduce severance, fear and anxiety and improve road safety and protect buildings
- iii. B1121 Friston: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety
- iv. Saxmundham: Measures to reduce congestion at the B1119/B1121 junction and safety measures to reduce severance, fear and anxiety and improve road safety
- v. B1121 Kelsale/ Carlton: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety

Inter-project mitigation

- vi. B1069 Knodishall: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety
- vii. A1094 Snape: Measures to reduce congestion at the B1119/B1121 junction and safety measures to reduce severance, fear and anxiety and improve road safety
- viii. A12 Safety improvements at B1119 Junction, Saxmundham, Bell Lane, Marlesford, Woodbridge Road, Bredfield

Working Hours

11.223 Requirement 7 Construction Hours [AS-087] are proposed to be 7 days a week. This will not allow a respite for local communities or the highway network.

- 11.224 The Applicant proposes to limit HGV deliveries to six days excluding Sundays and bank holidays it is recommended that the wording be altered to HGV movements to clearly include trips that are not deliveries such as removal of spoil from site. The OCTMP para 7.4.15 [AS-008] indicates the applicant is expecting up to 30 HGV movements on Sundays or Bank Holidays which is not acceptable to the LHA. SCC considered that (4) of this requirement provides sufficient flexibility for the applicant so that this will not hinder construction.

Benhall Railway Bridge

- 11.225 As matters stand, SCC is not persuaded that the applicant has demonstrated that the use of the Benhall Railway Bridge is achievable (for the reasons set out above dealing with that structure). SCC therefore urges the applicant to further consider revisions to its proposals to provide an alternative access route, preferably utilising the SLR if available at the appropriate time or (if not) the B1122. Since such an alternative may well require changes to the Order limits and to the scope of the required Works, SCC considers that this is a matter that merits early consideration within the Examination, so that the Examining Authority can probe the issue and, as necessary, give an indication of how the Examining Authority would wish to see it addressed and resolved, potentially by the applicant making a change request. Clearly, the earlier that such matters are addressed, the more straight forward it would be to accommodate any changes within the timetable for the Examination.
- 11.226 SCC considers that from a transport perspective the opportunity to provide a link road from SZC's SLR via Leston Airfield to link with the B1119 and hence a northern access to the SLR and Sea Link Converter Stations and the Substation has not been effectively or adequately explored by the applicant
- 11.227 SCC is seeking the development of an integrated access solution that provides for both the construction and operation of future, proposed and existing energy infrastructure. This solution must contend with the potential issues around the routing of construction traffic, including AILs, on the B1119 to the effect that a route must be kept clear for emergency access to Sizewell B, which is a problem for current, proposed, and future projects (particularly given the ambition to extend SZB operational life to 2055). SCC identified issues around emergency access and planning in paragraphs 83 and 138 of its Relevant Representation.
- 11.228 The Applicant has demonstrated its ability to coordinate with Lion Link with a long-term outlook in its coordination document [APP-363]. Therefore, SCC considers that such an approach should be applied to the issue of AIL access for both projects, with a resilient long-term solution implemented by Sea Link as the first of the two projects. This point is also relevant for future projects which will connect to the Kiln Lane substation with whom NGET will sign connection agreements and will need to deliver AILs of their own.

- 11.229 As currently designed, this bridge would form critical infrastructure to deliver Sea Link and potentially Lion Link. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.

Protection of the Local Highway Authorities Interest

- 11.230 SCC considers it reasonable to claim reasonable costs for additional activities that result from this project and protect Suffolk ratepayers from absorbing these. This has process has in general been agreed for previous consented NSIPs albeit using differing mechanisms. Such costs include:
- i. Approval and inspection of highway works
 - ii. Reviewing management documents (CTMP)
 - iii. Reviewing structural assessment of bridges to allow AIL movements
 - iv. Review data associated with surveys to record structural deterioration of carriageway on construction haul routes and contribution towards maintenance
 - v. Additional restricted hours working to avoid construction traffic or traffic regulations
 - vi. Commuted sums for additional highway infrastructure adopted by the authority or temporarily maintained by the authority on behalf of the Applicant
 - vii. Legal cost associated with highway agreements and adoption of highway.

Public Rights of Way mitigation and compensation

- 11.231 The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRoW to be clearly interpreted by the public.
- 11.232 The division of the effects of the development on PRoW across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRoW user, could then be significant, as recognised in the Planning Inspectorate's Advice Note 9.
- 11.233 The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from

parallel or concurrent projects. The impact of temporary closures of PRow should not be underestimated, as their value for local amenity could be severely reduced or removed during works.

- 11.234 The Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals, and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRow network, especially during the construction period.
- 11.235 The Council is concerned that reductions applied to the proposed Order Limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation for diversions of public rights of way.
- 11.236 For example, at the targeted consultation stage, a considerable amount of land was removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.
- 11.237 The Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users ("NMUs").
- 11.238 Any alternative provided PRow must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for NMUs to access local facilities and employment.
- 11.239 Where mitigation cannot be achieved, the Applicant should contribute to PRow and green infrastructure improvements. Compensation sites could include contributions towards improved PRow routes between Saxmundham and Leiston, PRow links North-eastwards to the coast, southwards to Sternfield and enhancement to North Warren Nature Reserve. Along with the previously requested PRow immediately south of the B1119 for off road NMU's, a PRow along the haul road across the river Fromus, and Sluice Cottage to the old railway line. These will benefit users on grounds of safety for taking NUM's off of the carriageway, encourage walking and cycling for health and wellbeing and provide cycle routes for staff reducing vehicle trips.
- 11.240 The Council is disappointed that a considerable amount of land has been removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to

the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.

- 11.241 Suffolk County Council is concerned that, through minimising areas that are to be included within the DCO (removing most of the field south of the B1119), comprehensive landscape and visual mitigation, and PRowS for NMUs, commensurate with the proposals, is being made more difficult, if not impossible, to deliver. Therefore, SCC considers that compensation, at least to some degree, is possible and is worthwhile pursuing.

Converter Station Site

- 11.242 Saxmundham Footpaths 5 and 6 cross the site and require diversion.
- 11.243 SCC considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.
- 11.244 The strip of land along of the B1119 currently included in the proposed DCO limits, even considering the recent change request by the Applicant, does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, which also connect to other PRow in the area.

River Fromus Crossing

- 11.245 If the River Fromus Crossing is to be made permanent, SCC PRow considers that this route should be made a Public Right of Way to link East Saxmundham to the Saxmundham Garden Neighbourhood and to link to the existing PRow network.
- 11.246 The Council is also concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on the PRow network at times they are most frequently used.
- 11.247 There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on Public Rights of Way. These include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PRow) alongside the Fromus crossing to link to the existing PRow network.
- 11.248 The Council considers that the surfacing of E-103/006/0 from Sluice cottage at the beach to the old railway line should be considered for mitigation due to the disturbance and impact on amenity as set out in the following documents: Schedule 9(1)(b) ‘...do what [it] reasonably can 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’. And Consideration of landscape and visual effects at both converter station sites, and possible mitigation including siting, planting & design approaches. From table 2 of the PINS Pre-Application Planning Services - Programme Document dated 2025 and 2.7 of the Project overview document dated October 2023 which states ‘When undertaking works, we consider what practicable measures can be taken to enhance nearby and surrounding areas for the benefit of local communities and the natural and historic environment’.

- 11.249 The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRoW users, in addition to local residents and businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.

Comments on application documents

- 11.250 In what follows, SCC provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Draft Development Consent Order (dDCO) [AS-087]

Pre-commencement Works [AS-087]

- 11.251 Clarity is requested of whether (n) ‘temporary access’ includes those shown on plans and listed in Schedule 9 or only refer to accesses strictly for the other activities listed under pre-commencement.

Adoption of Permanent Works and Maintenance of Temporary Works

- 11.252 Details of any permanent adoption for the alterations to streets listed in Schedule 6 Part 1 [AS-087] or any other highway works must be agreed in advance with the highway authority. Commuted sums may apply. For example, the bellmouth shown in pink on plan DCO/S/DE/PS/1215 [APP-037] DCO/S/IGA/PS/1501 [APP038] would be far in excess of that considered reasonable by SCC for permanent adoption.
- 11.253 Temporary works in Schedule 6 part 2 and Schedule 9 shall be maintained by Applicant contrary to article 18 [AS-087]. To expect the local highway authority to maintain temporary works from 12 months from completion in SCC’s view is an unreasonable burden placed on the Suffolk ratepayers.
- 11.254 Unclear whether any of the accesses to works listed in Schedule 9 should also be included

- 11.255 Safeguards must be put in place to limit the duration of the temporary closure of streets [AS-087 Schedule 8 Part 1], particularly B roads so that these can be co-ordinated with other highway works.

Traffic Regulation

- 11.256 The powers under article 50 (6) of the DCO [AS-087] can last for up to 5 years. Particularly for B class roads this would be an unacceptable duration to restrict vehicular access (1) b, c and (2) e. The other powers such as restriction speed limit and prohibition of parking should also be used sparingly to avoid undue disruption.
- 11.257 The Applicant should undertake sufficient consultation to satisfy the requirements of the Road Traffic Regulation Act 1984 (RTRA 1984) and the Traffic Management Act 2004 (TMA 2004). Experience from other projects suggests that the lack of consultation during the examination has been insufficient to give local residents, businesses, and road users the opportunity to comment or object to individual orders.

Document 7.5.1.1: Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]

- 11.258 Pre-construction activities as defined within the Order [AS-087] fall within the remit of the Outline Construction Traffic Management and Travel Plan (“OCTM&TP”) and are therefore this document will need to be robust to manage these activities. The OCTM&TP in the Council’s view lacks rigorous controls on HGV routing and details on the quantum of worker and HGV movements.
- 11.259 In SCC’s view that OCTMP lacks appropriate controls for construction vehicles, specifically caps to ensure that the assumed numbers and hence impacts are not exceeded. In reality. Nor is there a commitment than can be enforced in terms of workers shift patterns that form part of the embedded mitigation.
- 11.260 It is unclear if the definition of ‘workers’ includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.
- 11.261 In common with previous energy NSIPs SCC notes that the principal contractors have a significant role in managing construction traffic and workers. SCC’s experience is that it is common to have a number of separate contractors undertaking different elements of the project, for example one constructing the convertor station and another the cable route. Therefore, it is important that the applicant retains ultimate responsibility for compliance with the management plans and co-ordinating the same.

Average Vehicle Occupancy

- 11.262 The OCTMP paragraph 7.5.1 [AS-008] claims that an occupancy value of 1.5 is robust. No evidence is provided to support this. SCC's experience is that this target is difficult to achieve in practice.
- 11.263 Network Peak and Construction Workers Peak
- 11.264 This project, as with others, proposes workers shift changes at time outside the existing network peaks of 0800-0900 and 1700-1800. However, SCC is concerned that superimposing a number of projects shift changes may create a new network peak at these times or elongate the peak hours.
- 11.265 SZC is undertaking periodic traffic surveys in East Suffolk which may assist in determining if the concern is valid.

Definitions

- 11.266 It is noted in the OCTMP [AS-008] that HGV's are classified as those commercial vehicles exceeding 3.5 tonnes which is coincident with other NSIPs.
- 11.267 It is unclear what the definition of worker trips is and whether this includes administration staff and visitors who may travel in network peak hours. The definition of LGVs is also not clear.

Management Structure and Reporting

- 11.268 Table 7.1 gives roles and responsibilities for implementing the management plans including the OCTMP [AS-008]. SCC is concerned that similar projects have resulted in the appointment of a number of contractors for each element of the works, e.g. substation / converter and onshore cabling. The measures in the CTMP must ensure that the Applicant keeps overall control of the implementation and that monitoring is not fragmented across several elements of the works.
- 11.269 The maximum two-way HGV movements presented in the Traffic and Transport assessment [APP-054] should be regarded as caps and not exceeded to demonstrate compliance with the table 5.2 of the OCTMP [AS-008] including total daily movements and peak hour movements.
- 11.270 Controls
- i. SCC would consider the appropriate controls reasonable:
 - ii. HGV routes
 - iii. HGV timing
 - iv. Daily HGV cap
 - v. Peak hour cap
 - vi. With the following measured and reported:
 - vii. Worker numbers

viii. Worker car occupancy (or worker trips)

11.271

Document 7.5.9.1: Outline Public Rights of Way Management Plan – Suffolk [APP-352]

- 11.272 Ex1.1.1: This is not acceptable as a method of considering the PRow and the Definitive Map should have been acquired from the definitive map team⁴⁶ and correctly plotted. As incorrect assumptions on the definitive route, as opposed to assumed locations based on walked routes and desk top studies may lead to orders being invalid. This is repeated in section 2.4.1
- 11.273 2.5.4 PRow falling into the Public Rights of Way: Temporary Stopped Up (closure) designation are those where short periods of closure are proposed. This could be, in practice, for a few hours on a given day. The designation is associated with works such as the installation of required fencing and/or providing PRow access controls where necessary, which is expected to involve marshals and gates to minimise risk for PRow users. Alternatively, this designation could relate to longer periods of closure throughout the construction phase due to construction compounds or haul roads. A Public Rights of Way: Temporary Diversion will be provided where a PRow needs to be temporarily stopped up for a few days/weeks/months, to ensure that there are no temporary closures without a temporary diversion route being in place. Do we assume that there may be a few days without a diversion in place? i.e. allowing a route in the Order Limits to be temporarily closed with no alternative route? How will this be managed?
- 11.274 2.5.7 In terms of the operational phase, access to the HVDC alignment where this crosses beneath PRow E-103/006/0 and the approved King Charles III England Coast Path will be required by foot/quad bike for monitoring purposes. In addition, once the permanent access road for Friston Substation is operational, crossings with dropped kerbs will be installed across PRow E-260/016/0 and E-260/017/0 to retain access to the HVDC alignment in this location. There is mention of use of a quad bike on the PRow footpath, is the path suitable for use of a motorised vehicle, if not then we recommend that footpath E-103/006/0 to be resurfaced for its length.
- 11.275 No soil stockpiling or other preconstruction or construction activities to take place near, adjacent or on the PRow that may obstruct the PRow, or PRow diversion routes.

⁴⁶ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way>

Document 6.2.2.13: Environmental Statement Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]

- 11.276 The Council believes that there are inter-project effects that will impact on the PRow network and its users from more than just visual intrusion, but the lack of the single assessment approach for PRow, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRow network to the north of Friston, where there will be repeated temporary closures of PRow that could overlap with temporary closures on the same PRow required for the Sea Link project.
- 11.277 Given that it is likely that the construction periods for Sea Link and Lion Link will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at Saxmundham and the substation at Friston for both Sea Link and Lion Link are laid at the same time will help to reduce the cumulative impacts on the local community and environment.
- 11.278 Whilst at least some of the east coast NSIPs will be delivered at the same time with overlapping cumulative transport impacts there will also be a cumulative impact through repeated successive projects impacting on specific geographical areas.
- 11.279 13.4.9 Traffic and Transport in terms of PRow closures and diversion, does not address mitigation or effects if the schemes cannot be co-ordinated. Moreover, the Applicant's coordination document [APP-363] does not address how PRow management will be coordinated with the EA1N and EA2 projects. Therefore, it cannot be assumed that there will be no significant cumulative effects. Other sections state that cumulative receptors will have a moderate effect, but if co-ordinated then it is minor. Provision should be included in the application for additional mitigation or compensation measures if the coordination claimed in this assessment does not come to fruition during delivery.
- 11.280 Successive impacts of projects delivered one after the other are not mentioned and needs to be assessed if moderate or above such as in terms of disruption to Public Rights of Way network including repeated closures, diversions, or loss of amenity benefits.

Document 7.5.3.1: CEMP Appendix A - Outline Code of Construction Practice [APP-341]

- 11.281 The Council, including in its role as LHA, is not content with the inclusion of Sundays and Bank Holidays as working days, with justification that this is essential to delivery of the project ([APP-341] and dDCO Requirement 7). Such working practices would mean that communities would not have relief from

construction traffic for the full duration of the project. Roads used for recreational purposes and the PRow network will be impacted at the times they are most frequently used as a result. Consideration should also be given to impact on tourism for the area.

Table 10: Summary of local impacts – Air Quality

Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative/ Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
10.1	Impact of construction of surface infrastructure and underground cabling on air quality	C	Negative	Deliver mitigations as set out in the relevant plans: -Construction Traffic Management and Travel Plan -Construction Environmental Management Plan -Dust Management Plan - Outline Air Quality Management Plan – Suffolk	NPS / Green Future / NPPF / SCLP

				In addition to mitigations set out in relevant plans: -Restrictions to construction working hours.	
10.2	Impact of operation and maintenance of surface infrastructure and underground cabling on air quality	O	Neutral	Minimal air quality impacts assuming no major repair work is required. Travel is predicted to be infrequent (Environmental Statement, Chapter 8, Air Quality) and there are no human or ecological receptors within 200m of the backup generators. No mitigation therefore required.	NPS / Green Future / NPPF / SCLP
10.3	Impact of decommissioning of surface infrastructure and underground cabling on air quality	D	Negative	Further details required relating to the decommissioning phase to be	NPS / Green Future / NPPF / SCLP

				able to effectively assess the impacts. Upon development of the relevant plans below the delivery of the relevant mitigation will be required: -Decommissioning Traffic Management and Travel Plan -Decommissioning Environmental Management Plan -Code of Construction Practice - Outline Air Quality Management Plan - Suffolk	
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12 Air Quality

Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

- 12.1 This 25 Year Environment Plan sets out government action to help the natural world regain and retain good health. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use, and fishing that puts the environment first.

Clean Air Strategy 2019

- 12.2 The Clean Air Strategy sets out Government plans for dealing with sources of air pollution.
- 12.3 “An aim is to shift the focus towards prevention, promoting greater action to avoid exceedances, rather than tackling air pollution only when limits are surpassed.”

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 12.4 “5.2.1 Energy infrastructure development can have adverse effects on air quality. The construction, operation and decommissioning phases can involve emissions to air which could lead to adverse impacts on health, on protected species and habitats,⁴⁷ or on the wider countryside and species.”

National Planning Policy

National Planning Policy Framework, December 2024

- 12.5 “187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;”

Local Plan Policy

Suffolk Coastal Local Plan

- 12.6 Policy SCLP10.3: Environmental Quality, states that development proposals should protect the quality of the environment, minimise pollution and

⁴⁷ Impacts on protected species and habitats are covered in Section 5.4 of EN-1.

contamination, and seek to secure improvements to air quality. The impacts of the development on air quality, including in Air Quality Management Areas, should be considered.

- 12.7 Policy SCLP11.2: Residential Amenity, states that the impact of the development on residential amenity, including air quality, will be considered. This policy also notes that the development must not cause an unacceptable loss of amenity, including in relation to air quality, for occupiers of development in the vicinity.

Neighbourhood Plans

Saxmundham Draft Modified Neighbourhood Plan

- 12.8 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states “The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 12.9 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied.”

Local Impact Assessment

Construction Phase Impacts

Positive

- 12.10 None identified.

Neutral

- 12.11 None identified.

Negative

- 12.12 From a Public Health perspective there is no safe level of air pollution. Evidence⁴⁸ shows both long-term exposure (over years) and short-term exposure (over hours) to low levels of air pollution can impact health with poor air quality linked to a range of conditions from asthma and lung cancer to heart disease and dementia. Further detail on this evidence can be found in Appendix 15. When referring to ‘low levels of air pollution’ the evidence relates to levels well below the statutory legal limits referenced in the Environmental Statement (Chapter 8: Air Quality [APP-055]). This is the reason the World Health Organisation has issued updated guidance (see Appendix 16) with recommended pollution levels up to 4 times lower than the statutory legal limits currently set in the UK to protect public health. Whilst SCC acknowledges that these guidelines aren’t statutory in the UK, they do evidence a shift in understanding around the levels at which air pollution can harm health and the growing body of evidence to support this.
- 12.13 Air pollution disproportionately impacts people with pre-existing respiratory and cardiovascular conditions. Suffolk has a statistically significantly higher prevalence of COPD and asthma in many of its districts than the England average and that includes in East Suffolk (Asthma prevalence in East Suffolk is 7.8% compared to an England average of 6.5%; COPD prevalence in East Suffolk is 2.5% compared to an England average of 1.8%). The impacts on vulnerable Suffolk residents, and on the health and care system, are being seen in Suffolk hospitals, particularly though the increased admissions for respiratory conditions in the winter months⁴⁹.
- 12.14 The air pollution levels resulting from the Sea Link Proposal have been concluded in the Environmental Statement (Chapter 8: Air Quality [APP-055]) to be ‘Not Significant’ throughout the construction phase and whilst SCC are satisfied with the mitigations proposed, which include air quality monitoring, there is a lack of clarity at this stage relating to construction transport routes

⁴⁸ Guidance, Health Matters: Air Pollution. Available from:

<https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

⁴⁹ Health and Air Quality Report to the Suffolk Health and Wellbeing Board. Available from:

[https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(19-09-2024\),%20Suffolk%20Health%20and%20Wellbeing%20Board](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(19-09-2024),%20Suffolk%20Health%20and%20Wellbeing%20Board) (Agenda Item 6)

and the subsequent impacts on the wider transport network (which will have an impact on local air quality).

- 12.15 Public Health also have concerns regarding the proposed working hours which offer little respite from project emissions for local communities. This concern becomes more significant when the cumulative impacts from the other developments in the area are taken into consideration.
- 12.16 The Environmental Statement (Chapter 13: Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) reviews the cumulative impacts from twenty-five projects happening in a similar timeframe and location to that of the Sea Link Project. The review concludes that there are unlikely to be significant cumulative effects on health and wellbeing, as a result of there being no significant cumulative effects identified for traffic and transport or air quality (Environmental Statement Chapter 7: Traffic and Transport [APP-054] and Chapter 8: Air Quality [APP-055]).
- 12.17 This view however is not supported by Public Health. In the Environmental Statement (Chapter 13: Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) it is stated *‘Vehicles associated with the Sizewell C main development site share the same routes as vehicles associated with the construction of the Proposed Sealink Project, such as the A12. However, as the Proposed Project only has negligible effects, cumulative effects are not likely to occur.’* From a Public Health perspective, SCC does not agree with this rationale. An increase in vehicles on the road will lead to increased Nitrogen Dioxide (NO₂) and Particulate Matter (PM_{2.5} and 10) and even at low levels the evidence suggests it can still have an impact on health and these impacts should not be dismissed.
- 12.18 There are a number of mitigations set out in the Outline Air Quality Management Plan [AS-129] which will see air pollution managed and monitored. These mitigations will reduce but not eliminate emissions, and as such, the overall effect on local residents, visitors, and businesses during the construction period, particularly in combination with other NSIPs happening concurrently, is expected to remain adverse.

Operational Phase Impacts

Positive

- 12.19 None identified.

Neutral

- 12.20 There is a small possibility of increased air pollution arising from emissions from staff travel for inspection, maintenance, and repairs during the operational phase in addition to emissions from the substation and converter station back-up generator.

- 12.21 These could impact on the health and well-being of nearby communities particularly those more at risk from the health impacts of poor air quality. However, travel is predicted to be infrequent (Environmental Statement, Chapter 8, Air Quality) and there are no human or ecological receptors within 200m of the backup generators.
- 12.22 Minimal air quality impacts are therefore expected in the operational phase assuming no major work is required and therefore the impacts are deemed Neutral.
- 12.23 Should major work be required it is vital that appropriate mitigations are put in place and approved by the relevant authorities to ensure minimal impact on local communities.

Negative

- 12.24 None identified.

Decommissioning Phase Impacts*Positive*

- 12.25 None identified.

Neutral

- 12.26 None identified.

Negative

- 12.27 According to the Environmental Statement (Chapter 8, Page 45, Air Quality) likely impacts from decommissioning are similar to the construction phase and could impact air quality through:
- Dust from decommissioning works
 - Decommissioning vehicle emissions
 - Non-Road Mobile Machinery emissions
 - These emissions have the potential to impact on the health and well-being of nearby communities, particularly those more at risk from the health impacts of poor air quality.
- 12.28 Further details are required relating to the decommissioning phase for Public Health to be able to effectively assess the impacts and the required mitigations, however if the assumption being made is that they are similar to the construction phase then our points relating to impacts in the construction phase (above) are relevant here. The health and wellbeing of local people is paramount, and mitigations need to ensure that impacts are minimised.

Required Mitigation

- 12.29 As stated in SCC's relevant representation, Public Health will defer to East Suffolk Council on air quality matters as they are the monitoring authority, but from a Public Health perspective it is vital that the cumulative impacts of these projects and their impact on the health and well-being of local residents, particularly those residents more vulnerable to the effects of air pollution, is at the forefront of any decisions and is given the weight it deserves.
- 12.30 Whilst individual reports on individual projects may conclude impacts to be 'negligible' or 'not significant' Public Health have concerns that the number of concurrent NSIPs and other major developments taking place in the same locality and temporal space will place notable pressure on the health and wellbeing of local communities through the increased traffic and air pollution with little respite.
- 12.31 Whilst it is acknowledged that appropriate mitigations are proposed and pollutant levels are not expected to exceed Statutory Limits it is important to recognise that there is a growing body of evidence suggesting these Statutory Limits are not enough to protect health and SCC would therefore like to see an emphasis on bringing air pollution levels down as low as possible for the health and wellbeing of our residents.
- 12.32 SCC expects to see the delivery and monitoring of the mitigations and their effectiveness as set out in the following plans:
- Construction Traffic Management and Travel Plan
 - Construction Environmental Management Plan
- 12.33 Including the following which are secured by Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order:
- 'Avoiding the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable; Ensuring all equipment complies with the appropriate Non-Road Mobile Machinery standards; Using stage 4 NRMM as a minimum and stage 5 where possible additionally, where possible, use alternative / renewable energy to power NRMM; and any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, to be located away from sensitive receptors such as residential properties or ecological sites where practicable'.
- 12.34 In relation to the siting of equipment or activity that may produce nuisance such as dust SCC would expect a firmer commitment that these will take place away from sensitive receptors and would require advanced notice and information should this not be the case.

- Code of Construction Practice

Mitigation measures set out in this plan are from the Institute of Air Quality Management best practice construction dust guidance.

- Outline Air Quality Management Plan

This sets out a commitment for air pollution monitoring to take place before and during the construction process. This is welcomed and SCC considers the plan suitable; it will enable the identification of pollution hotspots where interventions to reduce pollution levels will be required should any exceeding or trigger thresholds be exceeded.

- Detailed Decommissioning Traffic Management and Travel Plan is required

- Detailed Decommissioning Environmental Management Plan is required

- 12.35 In line with other mitigations proposed in this report (Health and Wellbeing, Traffic and Transport, Noise and Vibration chapters), SCC would encourage the working hours to be reconsidered to offer local communities' respite from potential emissions (regardless of the level of emissions).

Table 11: Summary of local impacts – Socioeconomics, Recreation and Tourism					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative / Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
Supply Chain and Economic Development					
11.1	Investments in local economy as part of the construction programme and associated local/regional supply chain opportunities (incl. GVA)	C / O / D	Neutral to Positive	Recommendations 1. Engage with the Local and Regional Supply Chain following the Supplementary Guidance. 2. Establish Governance with Local Economic Development Partners 3. Commit to Regional Supply Chain Monitoring and Reporting 4. Work with the Regional Skills Coordination Function at the County Council to identify and make use of opportunities for collaboration and enhancement. Mechanism	Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy

				1. A new DCO Requirement obligating the production and implementation of a Skills and Employment Plan which includes provision for supply chain engagement in consultation with SCC and the Regional Skills Co-ordination Function. 2. Engagement with the Regional Skills Coordination Function.	
11.2	Potential for minor positive impacts as a result of additional spend from a non-homebased workforce	C / D	Positive	The scheme could provide some benefit in terms of additional spend of non-homebased workers. Once the size of workforce is known and particularly those non-homebased, the Applicant should work with the Council on schemes/strategies encouraging non-homebased workers to spend locally.	
11.3	Impact on businesses and supply chain to other construction projects in the local area and region due to	C / D	Negative	Given that there is a substantial number of nationally significant energy projects in the region that require similar skilled workers during the same time period, the Council expect the	NPS EN-EN1 identifies that large-scale development projects are likely to have socio-

	workforce displacement and churn			Applicant to quantify and mitigate the negative impact of displacement. The Applicant will need to work with the Council to produce plans and strategies to help control the rate of workforce displacement.	economic impacts at local levels, e.g., on small businesses.
Employment, Skills, and Education					
11.4	Local employment opportunities from the construction; opportunity for local employment creation	C / D	Neutral	Recommendations 1. Develop and Secure an Employment and Skills Strategy based on an appropriate assessment following the Supplementary Guidance which includes an apprenticeship strategy and monitoring and reporting on employment outcomes and social impact 2. Financial Contributions to the Regional Skills Co-ordination Function 3. Integration with Regional Skills Governance	NPS EN-1 Socioeconomics: socio-economic impacts may include the creation of jobs and training. Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy: To seek to maximise the benefits of economic growth, skills, and STEM (Science, Technology, Engineering and Maths) educational inspiration, from energy generation and

				Mechanism 1. A DCO Requirement mandating preparation and implementation of an Employment and Skills Strategy. 2. A Planning Obligation (Section 106) to establish the financial contribution to the RSCF.	connection projects, are fully realised for the communities of Suffolk, to support the long-term economic growth of the area.
11.5	Opportunity to support and enhance Suffolk's skills infrastructure and training offer. Also leaving a legacy post-construction.	C / O / D	Neutral to Positive	Recommendations 1. Financial Contribution to Regional Skills Coordination Function - The Applicant should provide a ringfenced financial contribution (capital and revenue) to support the delivery of the <i>Regional Skills Coordination Function (RSCF)</i>, which is led by Suffolk County Council under the Sizewell C Deed of Obligation. - Funding would support governance, data coordination, alignment of	

				providers, skills investment, and cross-NSIP workforce planning. 2. Capital and Revenue Support for Local Training Providers The Applicant should also provide capital and revenue funding for local skills infrastructure and adapting local training offers where relevant – secured through an obligation. 3. Legacy Strategy for Skills and Innovation i.e. How capital investment in training will be sustained beyond construction. How curriculum innovation or new facilities (e.g. simulators, test rigs, employer-led academies) can benefit future projects. Opportunities for research partnerships, digital learning access, or public education on energy transition. 4. Apprenticeship and Industry Placement Programme	
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				An apprenticeship strategy/plan should be delivered as part of an Employment and Skills Plan. 5. Integration into Governance and Strategic Planning The Council expects the Applicant to deliver a suitable governance model, involving the Council and the RSCF to maximise opportunities – secured through an obligation. Mechanisms 1. A Planning Obligation (Section 106) securing: - A contribution to RSCF governance and coordination. - Capital and revenue grants for local training infrastructure and curriculum readiness. 2. A DCO requirement if appropriate, to tie delivery and provision of the above mechanisms and	
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				recommendation to a deadline of 6 months or more prior to project commencement.	
11.6	Opportunities for unemployed and under-employed.	C / D	Neutral	With the correct agreement, strategies, and collaboration with the Applicant this could be a positive impact. The Applicant is expected to work collaboratively with the Council to set clear, ambitious, and SMART targets – delivered through a Skills and Employment Plan The Applicant should deliver activity to increase the size and diversity of the labour market pool. The Applicant should also provide an employment outreach fund – secured through an obligation – and fund a bursary scheme to remove barriers to	

				training and employment – secured through an obligation. The Council expects the Applicant to deliver a suitable governance model involving the Councils to maximise opportunities throughout the entire construction programme. Employment outcomes and social impact should be monitored and reported on by the Applicant.	
11.7	Indirect and induced employment opportunities.	C / D	Neutral	Recommendations 1. Maximise Local Workforce Spend The Council expects the Applicant to: - Prioritise local food and services procurement where feasible - Issue guidance to Tier 1 contractors on directing workers to local businesses (e.g. through a digital directory or partnership with East Suffolk Means Business).	

				2. Align with Supply Chain Engagement and Employment Strategies The indirect and induced benefits are amplified when embedded in a broader strategy to localise procurement and employment. Therefore, local supply chain plans should be integrated into the <i>Employment and Skills Strategy</i> and <i>Supply Chain Engagement Plan</i>. 3. Engagement with Visitor and Hospitality Sectors - Local hospitality providers to understand seasonal capacity and mitigate pressure points. - Tourism stakeholders to ensure worker influx does not conflict with peak visitor periods. Mechanism Periodic monitoring reports on local spend, procurement localisation, and secondary employment effects shared with the RSCF and local economic forums.	
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11.8	Local employment opportunities during operation.	O	Neutral	Recommendation and Mechanism Integration with the RSCF on strategic workforce planning across all phases of the project	
Tourism					
11.9	Impact on Suffolk as a tourism destination, where surface infrastructure detract from the environmental quality for recreational activity more broadly and the perception and propensity of people to visit the area.	C / O / D	Negative	The area is home to some of Suffolk's most distinctive and recognisable features and landscape. There are concerns that, in the short-medium term, there will be a negative effect on tourism during the implementation phase. Therefore, in collaboration with the Council, the Applicant should identify and characterise the tourism businesses within 2km of the red line boundary of the project. Likely impacts on these businesses should be identified and a package of mitigation measures developed.	NPS EN-1 paragraphs 5.13.4, 5.13.6 SCLP 6.1

11.10	Displacement of tourists from accommodation as a result of demand from workforce	C / D	Negative	The accommodation sector would be unlikely to be able to accommodate workforce and tourists. This could result in potential visitors choosing another area of Suffolk or the UK instead. This would not just have an impact on accommodation, as the spending patterns of a transitory labour force would be quite different to those of tourists and this might jeopardise trade for other related tourist businesses, such as restaurants and visitor attractions. Likely impacts on these businesses should be identified and a package of mitigation measures developed.	NPS EN-1 paragraphs 5.13.4, 5.13.6 SCLP 6.1
11.11	Business benefits of workforce taking up tourism accommodation	C / D	Neutral	Whilst workforce business will be good for accommodation providers in the short-medium term, it is finite. See below	
11.12	Potential “boom and bust” effect on tourism accommodation if becoming reliant on workforce bookings	C / D	Negative	The definition of a “visitor” is a broad one. And a successful thriving tourism economy is one which can accommodate a mix of visitors, be they holidaymakers, day-trippers,	NPS EN-1 paragraphs 5.13.4, 5.13.6 SCLP 6.1

				workers etc. The area is a popular tourism destination. We do not want the legacy of the work period to be that the area is known as one where visitor accommodation is in short supply. We need to ensure that tourists are still able to stay in the area and that an appropriate mix of workforce and visitors can be maintained. If an area becomes reliant on one particular sub-sector for an extended period of time, then there is a danger that this mix will be adversely affected, which will ultimately not be good for an all-year-round visitor economy. This area of Suffolk is not reliant on good weather (unlike, say, a coastal resort) and has the ability and potential to be a draw for short breaks during the off-season shoulder months of the year. It is important, therefore, that visitors of all types are able to access accommodation. Likely impacts on these businesses should be identified and a package of mitigation measures developed.	
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11.13	Perception of area by potential visitors	C / O / D	Negative	There are a number of large-scale energy/ construction initiatives proposed for Suffolk over the coming years. Potential visitors may be deterred by the view that the county will be full of diversions, traffic jams and construction traffic and consideration needs to be given as to how this can be combatted/ mitigated. This issue is likely to be exacerbated by core construction working hours including Sundays and Bank Holidays.	NPS EN-1 paragraphs 5.13.4, 5.13.6 SCLP 6.1
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13 Socioeconomics, Recreation and Tourism

Policy Context

National Policy

A Green Future: Our 25 Year Plan to Improve the Environment

13.1 Actions we will take include:

“Working with National Park Authorities and AONB Partnerships and Conservation Boards to deliver environmental enhancement, including through demonstrator projects, and engaging with communities through their statutory management plans.”

National Policy Statements

Overarching Policy Statement for Energy EN-1

- 13.2 Generic socio-economic impacts of energy NSIPs are covered in Section 5.13 of Overarching National Policy Statement for Energy (EN-1).
- 13.3 EN-1 sets out that “the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels”.
- 13.4 Paragraph 5.13.4 notes that socio-economic impacts may include the creation of jobs and training opportunities, effects on tourism, the provision of additional local services, including educational and visitor facilities, and improvements to local infrastructure. EN-1 notes that a changing influx of workers during the different construction, operation and decommissioning phases could have impacts. These may include a change to the local population dynamics, changes to the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport, and waste), and effects on social cohesion.
- 13.5 Paragraph 5.13.4 also covers potential cumulative impacts of development. The consenting and subsequent development of several projects within a region in a similar timeframe could create some short-term negative impacts, for example a potential shortage of construction workers.
- 13.6 Paragraph 5.13.6 notes that socio-economic impacts may be linked to other impacts, for example the visual impact of a development may also have an impact on tourism and local businesses.
- 13.7 Paragraph 5.13.11 notes that “the Secretary of State should consider any relevant positive provisions the Applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.”

National Planning Policy

National Planning Policy Framework, December 2024

- 13.8 “190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁵⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:
- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
 - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

Local Plan Policy

Suffolk Coastal Local Plan

- 13.9 Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects, states that proposals for Major Energy Infrastructure Projects must, where feasible, maximise the economic and community benefits of the scheme through agreement of strategies in relation to employment, education, and training opportunities for the local community.
- 13.10 Policy SCLP6.1: Tourism, states that tourism will be managed so as to protect the features of the area that make it attractive to visitors. Tourism is a substantial and important part of the East Suffolk’s overall economy, which brings benefit to quality of life and well-being of communities. The supporting text of Policy SCLP6.1 notes that tourism is an important part of the economy of the former Suffolk Coastal area, contributing 12% to total employment across the District in 2017. The Suffolk Coastal Economic Impact of Tourism Report 2017 identifies that over 6.3 million tourist trips were recorded generating a total of £325 million total tourism value across the plan area. The Ipswich Economic Area Sector Needs Assessment (2017) identifies that growth is expected to be seen within the 'Hospitality and Leisure' sector of the economy. Tourism is an important part of this sector reflecting both the cultural and natural environment across the plan area.
- 13.11 Policy SCLP8.2: Open Space, states that there will be a presumption against developments involving loss of open space or community sport and

⁵⁰ For the purposes of paragraphs 190 and 191 of the NPPF, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale, and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

recreation facilities, except in exceptional circumstances (e.g. where the loss will be replaced by equivalent or better provision).

Neighbourhood Plans

Saxmundham Neighbourhood Plan

- 13.12 SAX2: Expansion of existing business, states that proposals that expand or intensify existing businesses, particularly those which retain/increase the number of jobs and provide skills development, will be permitted if they strengthen the town's economy and do not have significant adverse impacts on the character of the area or the amenity of residents.
- 13.13 SAX3: New businesses, states that development proposals that enable new businesses to be established and grow will be supported, particularly those associated with the energy sector.

Saxmundham Draft Modified Neighbourhood Plan

- 13.14 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states "The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 13.15 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied."

Other Relevant Local Policy

Suffolk County Council Energy and Climate Adaptive Infrastructure Policy

Skills and Growth

- 13.16 The Council will continue working actively with the energy and water sectors, (developers, owners or operators and associated supply chains), Government, Local Enterprise Partnerships, and regulators, to facilitate the delivery of the policy, that seeks to ensure the use of best available techniques, to maximise the development of skills, employment, and educational inspiration in Suffolk. The objective being to create a relevantly skilled talent pool, that can take advantage of the opportunities presented by

a succession of energy generation, connection, and climate adaptive projects.

- 13.17 The Council expects that individual promoters will contribute to the delivery of these goals in Suffolk, looking to align the achievement of local priorities with their own, going beyond the minimum measures necessary to mitigate the clearly defined impacts of their project. This process should result in measurable outcomes that, for example, deliver social value.
- 13.18 The Council expects to have comprehensive and effective engagement with developers and their supply chain partners, to maximise the local business opportunity, skills inspiration, and employment benefits. Wherever appropriate, the Council and developers should promote synergies between projects that enhance these benefits, deliver growth, and attract inward investment.

Suffolk County Council Energy and Climate Adaptive Infrastructure Policy, Socio-economic Effects Supplementary Guidance

- 13.19 Project promoters are expected to support the delivery and use of local and regional supply chains by:
- Supporting the increase and acceleration of inward investment of Tier one and Tier two contractors who may be working on multiple projects locally, recognising the project's regional role as part of Suffolk's energy cluster.
 - Delivering opportunities for the growth of non-engineering or non-construction related businesses associated with the project, e.g. supporting the delivery of the project, including, but not limited to, catering, transport, and facilities management Identifying and developing opportunities for research, development, and innovation, across the energy and construction sectors in Suffolk, and the region.
 - Supporting the delivery of long term, sustainable opportunities, in the energy sector and related sectors, across Suffolk and the region.
 - Recognising that it is essential to differentiate between the construction and civils opportunities of the project, and the mechanical and electrical engineering opportunities, during the construction cycle.
 - Recognising that the mechanical and electrical engineering opportunities of the construction cycle, are likely to support and enhance the long term, permanent staffing, and regional legacy benefits of the project.
 - Project promoters should deliver and enhance existing and emerging skills and educational initiatives by:
 - Establishing with Suffolk County Council an agreed governance framework for the project's skills and educational enhancement, through Suffolk County Council's Regional Skills Coordination Function.

- Ensuring alignment with skills and educational initiatives in Suffolk, the Suffolk Social Value Skills Ask4 and, where appropriate, the wider region.
- Coordinating, and assisting contractors to develop, initiatives to ensure sufficient supply of skills and capabilities being available at the right time, to enable both project delivery, and the growth of the energy sector in Suffolk.
- Promoting and securing inclusive growth, by working to ensure provision of opportunities that align with the regional need.
- Ensuring that skills and educational initiatives are fully inclusive, recognising and responding to the diverse needs of Suffolk's communities; taking action to create access and remove barriers to opportunities for those groups that require it

Local Impact Assessment

Context

- 13.20 Suffolk has specific natural and geographic advantages which make it very attractive for locating low carbon energy generation and the subsequent connection projects. Suffolk has established industries, nuclear, offshore gas logistics and agri-tech, as well as climatic conditions, which make it attractive for specific low carbon technologies, especially new nuclear, solar power, hydrogen production, and anaerobic digestion. The delivery of Net Zero in the UK by 2050 is expected to require a pipeline of generation and connection projects in Suffolk. Therefore, significant changes for the economy, environment and communities of Suffolk can be expected as a result. Suffolk and the wider East of England has a unique blend of infrastructure, expertise, skills, and innovation. At the same time, hosting so many low carbon generation and connection projects presents a number of challenges, in terms of impacts on the tourism economy, local businesses and the labour market.

Construction Phase Impacts

Positive

Supply Chain and Economic Development

- 13.21 While the overall impact of the proposal on supply chain and economic development is considered by the Council as neutral, the Council accepts that the construction of the Sea Link grid reinforcement project could have some minor positive impacts on the local supply chain through investment in local businesses to support delivery of the installation of the project. However, given the relatively short construction period of the project, the benefits on the local supply chain are not expected to have a long-term impact unless consideration is given to the wider network projects and how local supply chain can support all of these. There are, in addition to Sea Link, further grid reinforcement and interconnector projects in planning that are expected to be constructed prior to 2030. Therefore, a developed local supply chain with experience in the construction of these installations can expand to take advantage of these projects and be in a position to export their expertise to similar large-scale project opportunities nationally.
- 13.22 Unless reinforced through proactive local procurement, workforce accommodation planning, and coordination with local service providers. While the Sea Link project is likely to generate some indirect (supply chain-related) and induced (spending-related) employment during the construction phase, these impacts will be diffuse and largely dependent on the degree of local economic integration—something currently unaddressed in the application.

- 13.23 Suffolk's economic base — especially in rural towns like Saxmundham, Leiston, and Aldeburgh — is made up of mostly small, service-oriented businesses that could benefit from short-term construction activity, particularly if accommodation is sourced locally and worker spend is retained within the community. However, without intervention, these opportunities tend to be minimal and transient and are often captured by larger regional or national suppliers.
- 13.24 Sea Link's ES applies a multiplier of 1.5 to model indirect and induced impacts, but does not define the geography of this benefit, nor propose measures to localise it. The assumed 70% non-local workforce further limits the likely scale of induced effects in East Suffolk.
- 13.25 However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk, including the relevant local authorities. This will assist in the development of programmes that will support local businesses to grow and offer their services to supply the Applicant's project and other related projects within and outside the region. As this project is one of a series of projects being brought forward by National Grid in the locality, there is a far greater opportunity than a single project would present. To ensure these opportunities are realised, the Applicant's commitments should be detailed in a Skills and Employment Plan secured by a DCO requirement or Section 106 agreement.
- 13.26 Although the Council considers that there could be a minor positive impact caused by additional spend by a non-homebased workforce, the Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.

Neutral

- 13.27 There will be a neutral impact on supporting and enhancing Suffolk's skills infrastructure and training offer, moving to positive if structured investment and governance is secured. Sea Link presents an opportunity to enhance Suffolk's existing skills ecosystem, but this potential will only be realised through proactive alignment with Suffolk's established skills infrastructure, strategic interventions, and legacy-focused investment. Without such commitments, the project risks increasing pressure on training providers already servicing multiple NSIPs.
- 13.28 Suffolk is home to a growing infrastructure ecosystem i.e. engineering and construction. Investments such as the East Coast College Lound Facility, the Sizewell C ASEC Fund, and the SCC's Regional Skills Coordination Function (RSCF) are building capacity to enable Suffolk's economic development. Sea Link intersects this momentum but has not (based on the Environmental Statement) offered tangible and proportionate contributions to skills development, nor proposed integration with existing initiatives.

- 13.29 As Suffolk prepares for overlapping construction peaks from Sizewell C, EA1N/2, LionLink, and other projects, the Sea Link promoter has a critical role to play in ensuring that the skills infrastructure keeps pace with demand and that its investment delivers a long-term legacy beyond the temporary construction period.
- 13.30 SCC's Supplementary Guidance clearly states:
- 13.31 *"Contributions should be sought to enhance the long-term capability of Suffolk's education and training infrastructure as part of delivering a long-term legacy for the region."*

Negative

- 13.32 The Council considers there is a likely negative impact on workforce availability to regional businesses and supply chain due to workforce displacement and churn. Within the region, there are numerous energy infrastructure projects planned and expected to be in construction around the same period as the Applicant's development. These projects would likely require some of the skills and workforce needed for the construction of this project.

Positive

Employment, Skills, and Education

- 13.33 The Council anticipates potential positive employment, skills, and education impacts through collaboration with the Applicant. However, the Applicant expects a large proportion of the additional jobs created to be taken by those outside of the study area. The Council considers this to be unacceptable and expects the Applicant to develop a comprehensive Skills and Employment Plan, and to engage with the Regional Skills Coordination Function at the Council to address this.
- 13.34 There are opportunities for some positive employment, skills, and education impacts, in terms of employment levels and reducing inequalities by creating opportunities for those furthest from the workforce and for vulnerable groups. To achieve such positive impacts, the Applicant would need to identify the different skills required across their total workforce, and then the propensity and flexibility of the labour market within the 60-minute travel study area to fill these identified roles. In parallel, the Applicant would also need to identify local supply chain companies that can become involved in the project.
- 13.35 To achieve this positive impact, the Applicant needs to work collaboratively with local stakeholders, share detailed skills and job information in advance, and provide funding for several interventions that will ensure a pipeline of local people can be trained and enter the labour market at the right time with the right skills to take up opportunities that the scheme will provide. This should be detailed within a Skills and Employment Plan, via the DCO.

- 13.36 The Council considers that the Applicant needs to work with their associated supply chains, contractors and local partners to recruit and train local people ahead of the construction period which will ensure that they develop their skills and are enabled to move between roles and different types of contracts as we see a range of energy infrastructure projects in the region. The project, as part of the wider energy infrastructure construction projects, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. This includes:
- i. Providing new, additional employment opportunities for all (as required within EN-1, paragraph 5.13.4), but especially those who are currently unemployed or underemployed, thereby reducing in-work poverty and inequality which has risen sharply in the region.
 - ii. Increasing skills attainment levels for school leavers and those in work through using net zero/clean growth as a catalyst to motivate the workforce to seek, and take advantage of, opportunities for professional development (in alignment with EN-1, paragraph 5.13.11).
 - iii. Driving inclusive regional growth, reducing regional inequalities, and boosting local prosperity - by boosting productivity, pay, jobs and living standards by growing the local supply chain in sustainable industries (as described in EN-1, paragraph 5.13.4).
- 13.37 In order to achieve these outcomes, the Council expects the Applicant to work with local partners to:
- i. Embed social value in their associated supply chain, delivering change for local people around jobs, sustainability, health and well-being, inclusivity, and equity.
 - ii. Raise career aspiration through the creation of sustainable and progressive employment opportunities and contribute to a further enhanced integrated careers and advice system which connects and inspires young people into training for the careers available locally utilising local initiatives
 - iii. Be an advocate for a diverse, dynamic, and inclusive workforce
 - iv. Wherever possible, align, utilise, and actively promote existing and integrated skills resources available in both counties, enhancing and enriching the local offer for all.
- 13.38 The benefits of apprenticeships for both an employer and apprentice are widely publicised. The project will provide many opportunities for local apprenticeship recruitment supporting regional growth sectors of construction and engineering and play an important part in mitigating any negative employment churn impacts in wider regional employment sectors.

Neutral

- 13.39 The Council considers that there will be only negligible positive impacts because of indirect and induced employment opportunities, particularly due to the linear nature of the project. However, there is the potential for a positive impact to be created if there is sufficient and early supply chain engagement.

Negative

- 13.40 The Council considers there is a likely negative impact on workforce availability to regional businesses due to workforce displacement and churn.
- 13.41 Labour market churn occurs as workers move between jobs. While the Council welcomes, in principle, opportunities for individuals to access jobs with better pay and enhanced career paths, in this case the Council considers labour market churn will have a damaging negative impact on the local economy. Given the relatively short construction period of this proposal combined with the fact there are limited long-term operational roles, any employment churn, where skilled labour prematurely leaves their current local employment to work on the project, will have a damaging negative impact on the local economy.
- 13.42 If proactive and well-structured local employment strategies are adopted in partnership with the Council. Without targeted interventions, the actual employment benefit to Suffolk residents is likely to be minor due to workforce competition, high leakage, and a limited skills pipeline for specialised trades.
- 13.43 Sea Link's construction phase in Suffolk is expected to require an average of 86 full-time equivalent (FTE) workers annually, peaking at 327 FTEs for one day in 2028. However, based on the Environmental Statement's assumptions:
- i. Only 30% of the workforce is expected to be home-based.
 - ii. No specific employment or apprenticeship targets are proposed.
 - iii. No outreach or intervention plans to increase local labour participation are included.
- 13.44 Suffolk has the foundations for a stronger local construction workforce offer. It benefits from:
- i. A growing energy and infrastructure training ecosystem (e.g. East Coast College, Suffolk New College, and the Energy Skills Centre).
 - ii. A well-established Regional Skills Coordination Function (RSCF) mandated through Sizewell C.
 - iii. Known gaps in certain skill areas (e.g. civils, M&E, logistics) which require proactive pipeline development.
- 13.45 In a region facing cumulative NSIP demand, passive assumptions of local employment delivery are insufficient. SCC's Supplementary Guidance clearly states that:

- 13.46 “Employment should always be referred to as an opportunity. It cannot be assumed that just because there is an opportunity that this will result in employment happening.”
- 13.47 There are a significant number of NSIPs in East Suffolk that will be requiring similar skilled workers at the same time, and the construction period for Sea Link is predicted to coincide with that of Sizewell C Nuclear Power Station. This is likely to put pressure on the available workforce, potentially reducing opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.
- 13.48 The cumulative impact assessment (tables 13.33 and 13.43 of [APP-060]) concludes effects are not significant and states that labour capacity is sufficient to accommodate cumulative workforce demand, largely because the Sea Link workforce is small compared to Sizewell C. However, this conclusion does not fully address the risk of concurrent demand for specialist skills, nor does it explain how this finding was reached. Evidence from regional skills reports and NSIP labour forecasts suggests this assumption is flawed, as competition for roles such as electrical engineers, civil engineers, and welders is likely to be intense. The Applicant should confirm that current workforce data has been used in assessing worst-case scenarios, particularly given that Sizewell C’s sister project, Hinkley Point C, has increased its peak workforce numbers since the Environmental Statement was completed. In assessing cumulative impact, the magnitude of Sizewell C has not been properly factored in, only the magnitude of Sea Link itself. If the impact of Sizewell C is significant, then the addition of further projects such as Sea Link will exacerbate these effects.
- 13.49 In addition to workforce pressures, cumulative impacts on local businesses and supply chains require closer assessment. High levels of workforce churn and displacement could negatively impact SMEs, as skilled staff are drawn away to NSIP contractors offering higher wages, an issue that local businesses are already reporting to feel the effects of. This risk is compounded by overlapping project timelines, which may limit the ability of local firms to compete for contracts or retain experienced staff. The Environmental Statement does not quantify these indirect effects and does not propose specific mitigation beyond generic commitments. The Council expects the Applicant to model these risks and embed clear measures, such as supply chain engagement strategies and contractual social value requirements, within a Skills and Employment Plan secured through a control document.

- 13.50 The Council therefore requires the Applicant to undertake detailed scenario-based workforce modelling to accurately assess cumulative effects and ensure robustness. This modelling should clearly show total workforce numbers and timings, rather than stating FTEs across the project, to accurately reflect the situation. These measures should be embedded in a comprehensive Skills and Employment Plan and secured through an appropriate control document, in line with EN-1 Paragraphs 5.13.4 and 5.13.11, which require Applicants to consider socio-economic impacts, cumulative effects, and provide positive provisions to mitigate impacts and deliver legacy benefits.

Positive

Tourism

- 13.51 There may be some short-medium term benefits for accommodation providers due to workforce business, particularly if the scheduling of works allows workers' utilisation of accommodation to complement the tourist season.

Neutral

- 13.52 None identified.

Negative

- 13.53 Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SECHNL and Heritage Coast.
- 13.54 Construction of this project is likely to have an impact on the tourism business within 500 meters of the red line boundary and up to 2km of the red line boundary, particularly, but not solely, within the SECHNL. Furthermore, indirect impacts of construction on perception of these areas and consequent perception to visit them is likely to occur, and this issue is exacerbated by core working hours for construction including 7am – 5pm on Sundays and Bank Holidays due to the impacts on the PRoW network and roads used for recreational purposes at times they are most frequently used. Businesses, services, and attractions based on day visitors are likely to be the most sensitive.
- 13.55 There is the potential for construction workers to displace tourists from accommodation. This would result in reduced tourist numbers visiting the area, potentially negatively impacting local tourist businesses. Reliance of the accommodation sector on construction workforce bookings could lead to a “boom and bust” effect.
- 13.56 The potential for adverse impacts on tourist accommodation is exacerbated by the presence of several major infrastructure projects to be constructed at the same time such as Sizewell C, EA1N, EA2 and likely Lion Link. Table 13.33 of the cumulative effects assessment [APP-060] states that effects on Local

Accommodation Capacity are Not Significant. The assessment arguably underestimates the potential effects and need for mitigation. The tourism accommodation sector in this area is not large and projects such as this have the potential to offer short-term gain at the expense of longer-term loss of business which could occur.

- 13.57 The effects from severance on roads has the potential to cause significant disruption to the tourism industry as there will undoubtedly be crossover with other NSIPs. Sizewell is the most high-profile, but it is far from the only one. It has the potential to cause short-medium term disruption as there could be a perception issue where Suffolk could be seen as a less visitor friendly place if beset by diversions and delays. More consideration needs to be given to their effects and proposed mitigation measures
- 13.58 Table 13.43 of [APP-060] seems to downplay the significant cumulative effects on the area, the draw on workforce and on the available tourism accommodation which could occur courtesy of Sea link and other NSIPs. This needs to be re-examined and mitigation measures considered.
- 13.59 It is important that social, community and tourism impacts are not considered as a whole. Whilst all could potentially be impacted by projects such as this (both positively and negatively), the visitor economy is vulnerable to a number of economic and perception issues which could experience long-term disruption from projects such as these, unless mitigation measures are considered.

Operational Phase Impacts

Positive

Employment, Skills, and Education

- 13.60 None identified.

Neutral

- 13.61 The Applicant scoped out operational employment from the EIA due to limited numbers. However, the Council considers that, in combination with other projects in the region under construction at the same time as Sea Link, the number of potential operational employment opportunities is sufficient to be scoped into the Assessment.
- 13.62 Negligible (Potentially Under-Assessed) – Sea Link is likely to generate a small number of operational roles, particularly in maintenance, inspections, and long-term asset management. However, the Environmental Statement has scoped operational employment impacts out of the assessment - despite the Council's view that these effects are relevant, especially when considered cumulatively with other NSIPs and the need to support long-term economic resilience in the local area.

- 13.63 The project is part of a growing cluster of energy assets—including Sizewell B and C, EA1N/2 substations, and LionLink—which collectively require a skilled operational and maintenance workforce. It is therefore short-sighted to treat operational employment in isolation and dismiss its cumulative regional importance.

Negative

- 13.64 None identified.

Positive

Tourism

- 13.65 None identified.

Neutral

- 13.66 Underground cable sections of the route would overtime meld into the landscape.

Negative

- 13.67 Surface infrastructure would remain highly visible within the landscape. There would be a consequential impact upon the perception of visitors to the area.

Decommissioning Phase Impacts

Positive

Supply Chain and Economic Development

- 13.68 Decommissioning of the Sea Link grid reinforcement project could have some minor positive impacts on the local supply chain through investment in local businesses to support delivery of the decommissioning of the project. However, given the relatively short decommissioning period of the project, the benefits on the local supply chain are not expected to have a long-term impact.
- 13.69 There could be a minor positive impact caused by additional spend by a non-homebased workforce, but the Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.

Neutral

- 13.70 None identified.

Negative

- 13.71 The Council considers there is a likely negative impact on workforce availability to regional businesses and supply chain due to workforce displacement and churn. This is already being experienced in the county due to existing NSIPs.

*Employment, Skills, and Education**Positive*

- 13.72 The Council anticipates potential positive employment, skills, and education impacts. To achieve this positive impact, the Applicant needs to work collaboratively with local stakeholders, share detailed skills and job information in advance, and provide funding for several interventions that will ensure a pipeline of local people can be trained and enter the labour market at the right time with the right skills to take up opportunities that decommissioning of the project will provide.

Neutral

- 13.73 None identified.

Negative

- 13.74 The Council considers there is a likely negative impact on workforce availability to regional businesses due to workforce displacement and churn.

*Tourism**Positive*

- 13.75 Decommissioning of this project, once completed, will have a positive impact due to the removal of any and all visual impact to the designated landscapes.
- 13.76 There may be some short-medium term benefits for accommodation providers due to workforce business, particularly if the scheduling of works allows workers' utilisation of accommodation to complement the tourist season

Neutral

- 13.77 None identified.

Negative

- 13.78 Decommissioning of this project is likely to have an impact on the tourism business within 500 meters of the red line boundary and up to 2km of the red line boundary, particularly, but not solely, within the SECHNL. Furthermore, indirect impacts of decommissioning on perception of these areas and consequent perception to visit them is likely to occur, and this issue is exacerbated by core working hours for construction including 7am – 5pm on Sundays and Bank Holidays due to the impacts on the PRoW network and roads used for recreational purposes at times they are most frequently used. Businesses, services, and attractions based on day visitors are likely to be the most sensitive.
- 13.79 There is the potential for decommissioning workers to displace tourists from accommodation. This would result in reduced tourist numbers visiting the area, potentially negatively impacting local tourist businesses. Reliance of the

accommodation sector on decommissioning workforce bookings could lead to a “boom and bust” effect.

Required Mitigation

- 13.80 While the positive benefit to local supply chains and businesses from this project on its own may be limited and transient, the significant number of large-scale grid projects in planning within the local area and region, opens some opportunity for investing in local supply chain and businesses that can support the development of these projects. Therefore, the Council expects the Applicant to provide a positive strategy, with key targets for financial investment contribution towards the growth of local supply chains and businesses, enabling these businesses to play key roles in supporting this and other scale grid developments, regionally and nationally. The Applicant would be expected to work with the Council on the structure on how the financial investment would be used in terms of local business targets and schemes to develop local supply chain.
- 13.81 The measures outlined below should be incorporated into a comprehensive Skills and Employment Plan, secured through a legal agreement, in line with EN-1 Section 5.13 which requires Applicants to consider socio-economic impacts, including job creation, training opportunities, and legacy benefits (Paragraphs 5.13.4 and 5.13.11).
- 13.82 The project will have an impact on local labour markets and workforce availability, further exacerbated by the currently extremely low unemployment rate locally and nationally. It is expected that a number of workers will prematurely leave their current employment and this level of churn within the workforce will have a major significant negative impact. To mitigate this effect, the Applicant is expected, through the project, to create employment for those currently economically inactive, as well as to train, attract and employ those entering work and those that are under employed and therefore not impacting upon existing employment numbers. The Applicant should also support those that are transferring from other sectors for better employment. The Applicant is expected to ensure it is an exemplar for inclusion and diversity within its workforce to again ensure it is attracting labour from as many sources as possible beyond the currently employed labour market. As part of the Skills and Employment Plan, the Council expects the Applicant to:
- i. Conduct a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with the Council to ensure robustness and alignment with wider socio-economic modelling.

- ii. Deliver and fund, in collaboration with the Council and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project.
- iii. Work collaboratively with the Council to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment.
- iv. Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people.
- v. Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally.
- vi. Deliver activities with the Applicant to liaise with local tourism organisations and accommodation providers to understand demand and availability.
- vii. Ensure that all local accommodation providers are aware of this potential opportunity, liaise through existing networks.
- viii. Aim to increase the size and diversity of the labour market pool.
- ix. Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes.
- x. Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible; and
- xi. Commit to a comprehensive Skills and Employment Plan and engagement throughout the planning process, as well during construction, with the Regional Skills Coordination Function at the Council. This would support an ongoing assessment of cumulative effects and a strategic approach to skills and employment. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of the Council's local economics, in particular local opportunity that meets skills legacy for the region.

13.83 A legal agreement should be entered into that would provide workforce skills training as supported by EN-1 Paragraph 5.13.11 which encourages

Applicants to provide positive provisions to mitigate socio-economic impacts.

- 13.84 In collaboration with the relevant local authorities, the Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme. Likely impacts on these businesses should be identified and a package of mitigation measures developed.
- 13.85 The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers.
- 13.86 The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region.
- 13.87 Due to the potential displacement of visitors from the area and the effect on the visitor economy sector, and in order to mitigate impacts and maximise opportunities, the Council is seeking to secure the following:
- i. Funding to support local visitor economy initiatives to mitigate impact.
 - ii. Fund to support local visitor economy initiatives to mitigate impact.
 - iii. A s106 legal agreement should be entered into that would provide compensatory funding to address the negative impacts upon the perception of visitors to the area.
- 13.88 The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025.
- 13.89 The Council also encourages project promoters to consider legacy opportunities of all elements of their development.

Comments on application documents

- 13.90 In what follows, SCC provides comments on relevant application documents. The purpose of this section is to illustrate where improvements to these

documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.

Document 6.2.2.10: Environmental Statement Part 2 Suffolk Chapter 10: Socioeconomics, Recreation and Tourism [APP-057]

- 13.91 The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each
- 13.92 The Applicant expects a low level of net additional construction employment to be taken by local residents, due to the jobs being specialised construction. This is based on professional judgements and other similar schemes, but it is not clear that the number of other infrastructure projects taking place in the area, as well as those proposed by the Applicant, and therefore the prevalence of such specialised skills locally has been taken into account.
- 13.93 A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the Council would support a strategic approach to this issue.
- 13.94 The local labour force has been assessed to be of "low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses." The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods. Skills shortages have recently been referenced in the Clean Energy Jobs Plan as well as CITB's Workforce Outlook 2025-2029, Construction Skills Network Industry Outlook 2024-2028, the Technical Skills Legacy Report and Norfolk and Suffolk Wider Green Skills Analysis.
- 13.95 The Council disagrees with the scoping out of Operational Employment due to limited numbers, as this issue should have been considered alongside other projects in the region, which will amplify any effects caused. Specific workforce numbers also need to be provided.

Table 12: Summary of local impacts – Health and Wellbeing					
Ref No.	Description of Impact	Construction (C) / Operation (O) / Decommissioning (D)	Negative / Neutral/ Positive	Required mitigation and how to secure it (change/requirement/obligation)	Policy context
12.1	Impact of surface infrastructure and underground cables: Electromagnetic fields	C / O / D	Neutral	Compliance with the International Commission on Non-Ionizing Radiation Protection guidelines (1998) Completion of an EMF risk assessment in line with the Management of Health and Safety at Work Regulations 1999 and HSEs Control of Electromagnetic Fields at Work Regulations 2016	NPS EN-5 ICNIRP Guidelines 2020 HSE The Control of Electromagnetic Fields at Work Regulations 2016 The Management of Health and Safety at Work Regulations 1999 NPPF para 224(b)
12.2	Impact on access and use of PRowS and social infrastructure	C / O / D	Negative	Deliver robust mitigation measures secured within relevant control documents	Countryside and Rights of Way Act 2000 NPS EN-5 NPPF, paras 96 (a, b & c), 98 (b), 99, 103, 105, 135, 198, 223(f), 224(b) Countryside and Rights of Way Act 2000 Suffolk Coastal Local Plan, policy SCLP8.2

					Leiston Neighbourhood Plan Objectives 2, 3 and 5 Saxmundham Neighbourhood Plan Policies SAX6 and SAX15 Suffolk County Council Green Access Strategy
12.3	Impact of restricted access to health infrastructure	C / D	Negative	Engage with all parties to coordinate construction schedules Provide alternative routes, temporary access arrangements, or shuttle services where necessary Minimise the duration of restricted access Monitoring to address unforeseen issues promptly	Suffolk Coastal Local Plan Policy SCLP3.4 Saxmundham Neighbourhood Plan Policies SAX4 NPPF paras 198, 223(f), 224(b)
12.4	Impact on Local Employment	C / D	Neutral	Develop and implement a Local Employment and Skills Plan Keep businesses informed throughout construction.	NPPF para 85 SAX1, SAX4 NPPF para 8(a), 198 SCC Energy and Climate Adaptive Infrastructure Policy
	Impact on Public Mental Health	C / O / D	Negative	Adopt all principles within the Suffolk Community Engagement and Wellbeing SDG	Suffolk Community Engagement and Wellbeing SGD NPS EN-1

12.5				Provide clear support information and monitor wellbeing Restrictions to working hours	NPPF paras 96c, 103, 135, 198, 223(f), 224(b) Suffolk Coastal Local Plan Policy SCLP10.3, 3.4
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14 Health and Wellbeing

Policy Context

National Policy

The Control of Electromagnetic Fields at Work Regulations 2016

- 14.1 UK organisations with five or more employees need to complete an EMF risk assessment. This is a statutory requirement in line with the Management of Health and Safety at Work Regulations 1999.

The Management of Health and Safety at Work Regulations 1999

- 14.2 Regulation 3.—(1) “Every employer shall make a suitable and sufficient assessment of—
- a) the risks to the health and safety of his employees to which they are exposed whilst they are at work; and
 - b) the risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,”

International Commission on Non-Ionizing Radiation Protection Guidelines

- 14.3 For public exposure, the UK policy complies with the International Commission on Non-Ionizing Radiation Protection (ICNIRP) 1998 guidelines.

Countryside and Rights of Way Act 2000

- 14.4 Provides statutory protection for PRoWs and open access land.

National Policy Statements

National Policy Statement for Electricity Networks Infrastructure EN-1

- 14.5 NPS EN-1 sets out the general, strategic policy framework for all nationally significant energy infrastructure projects, covering energy policy objectives, climate change, energy security, and overarching assessment principles, including environmental, social, and economic considerations.

National Policy Statement for Electricity Networks Infrastructure EN-3

- 14.6 NPS EN-3 sets out the government’s policy for assessing electricity generation projects, balancing energy security, low-carbon objectives, and environmental and social impacts to guide NSIP decisions.

National Policy Statement for Electricity Networks Infrastructure EN-5

- 14.7 EN-5 provides a clear framework for planning inspectors to determine the potential impacts of the project. It includes exposure limits to protect against established effects and precaution for uncertainty.

National Planning Policy Framework, December 2024

- 14.8 Paragraph 5. The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.”
- 14.9 Paragraph 8 (a) “[...] an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure.
- 14.10 Paragraph 8 (b) “[...] a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”
- 14.11 Paragraph 85. “Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses, and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”
- 14.12 Paragraph 96 ‘a’ “[...] promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
- 14.13 Paragraph 96 ‘b’ “[...] are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear, and legible pedestrian and cycle routes, and high-quality public space, which encourage the active and continual use of public areas; and

- 14.14 Paragraph 96 ‘c’“[...] enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”
- 14.15 Paragraph 98 ‘b’“[...] take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;”
- 14.16 Paragraph 99 “Planning policies and decisions should consider the social, economic, and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.”
- 14.17 Paragraph 103 “Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change.”
- 14.18 Paragraph 105 “Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”
- 14.19 Paragraph 135 “[...] create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”
- 14.20 Paragraph 198 “[...] “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: (a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and (c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”
- 14.21 Paragraph 223 (f) “[...] “set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into

account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality.”

- 14.22 Paragraph 224 (b) “[...] “ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;”

Local Plan Policy

Suffolk Coastal Local Plan

- 14.23 Policy SCLP3.4: Proposals for Major Energy Infrastructure - highlights that projects must provide local community benefits and will have regard to policy requirements around community safety and cohesion impacts.
- 14.24 Policy SCLP8.2: Open Space - highlights the community and wellbeing benefits of open spaces and states that proposals that would result in the loss of open spaces will not be permitted except in exceptional circumstances, for example where the loss is replaced by an equivalent or better provision.
- 14.25 Policy SCLP10.3: Environment Quality - states that “development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination”. This includes impacts on air quality, soils, the loss of agricultural land, land contamination, water quality, light pollution, and noise pollution.

Neighbourhood Plans

Leiston Neighbourhood Plan

- 14.26 Objective 2: “Work with service providers to improve the physical infrastructure serving the residents and businesses of Leiston.”
- 14.27 Objective 3: “Improve the community infrastructure of Leiston in order to provide more places for people, young and old, to undertake their leisure pursuits.”
- 14.28 Objective 5: “Improve movement by non-car modes, principally walking and cycling, whilst ensuring that all new residential properties have levels of parking that are appropriate to Leiston’s role as a rural settlement and parish.”

Aldringham-cum-Thorpe Neighbourhood Plan – Submission version

- 14.29 Policy ACT12: Accessibility and Connectivity - notes the importance of safe and attractive pedestrian and cycle routes, PRow and crossings for residents’ health and well-being. The policy states that proposals that include measures to improve connectivity for pedestrians and cyclists will generally be supported.

Saxmundham Neighbourhood Plan

- 14.30 Policy SAX1: General design principles - identifies a set of criteria that development proposals should accord with, as appropriate. These criteria include enabling and supporting healthy lifestyles.
- 14.31 Policy SAX4: New community facilities - notes development proposals for new or improved community facilities will be supported.
- 14.32 Policy SAX5: Improving connectivity - notes the importance of safe and attractive pedestrian and cycle routes, PRoW and crossings for residents' health and well-being. The policy highlights that proposals that will improve connectivity for pedestrians, cyclists and users with a mobility impairment will be supported.
- 14.33 Policy SAX6: Public Rights of Way - notes that existing public rights of way should be protected and enhanced.
- 14.34 Policy SAX15: Green Spaces - identifies The Layers as an area of open space and a Suitable Alternative Natural Greenspace (SANG), meaning it is an important asset for recreational purposes, improving physical and mental health and wellbeing.

Saxmundham Draft Modified Neighbourhood Plan

- 14.35 SAXEN1: Addressing and mitigating the impacts of large-scale energy projects, states "The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. nuclear, offshore wind, interconnectors, pylons, converter stations, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes. Where works take place which have temporary impacts, the emphasis should be on timely restoration once works have been completed.
- 14.36 Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance directly in the parish where those impacts are most felt. Only if this is not possible or practicable should they be provided elsewhere in the parish. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied."

East Suffolk Cycling and Walking Strategy (2022) (East Suffolk Council, 2020)

- 14.37 This strategy serves as the Local Cycling and Walking Infrastructure Plan (LCWIP) for East Suffolk Council (ESC). The strategy's purpose is "*to create safe, coherent, direct, comfortable, and attractive cycling, walking and wheeling environments that lead to improvements in health and wellbeing, facilitate greater social interaction and play, encourage more environmentally*

sustainable lifestyles, reduce road congestion, and support economic growth”

Other Relevant Local Policy

Suffolk Green Access Strategy⁵¹

- 14.38 The Strategy sets out Suffolk County Council’s plan to improve, maintain, and promote public rights of way and green access across the county. It aims to make walking, cycling, and access to open spaces easier and more inclusive, supporting health, wellbeing, and sustainable travel. The strategy includes actions for better management, community involvement, and integrating green access into new developments, helping to create healthier and more connected communities.

Suffolk Energy and Climate Adaptive Infrastructure Policy

- 14.39 The Policy sets out how Suffolk County Council will engage with and influence major energy and climate projects. Its aim is to maximise local benefits including jobs and skills whilst ensuring that environmental and community harms are properly assessed, minimised, and compensated where needed.

Suffolk Community Engagement and Wellbeing Supplementary Guidance Document⁵²

- 14.40 The SGD sets out Suffolk County Council’s expectations for how major infrastructure project promoters should engage with local communities. It emphasises early, honest, and ongoing dialogue, robust assessment of community wellbeing impacts, including mental health and the need for effective mitigation and support throughout all project phases, to ensure that local voices are heard and community wellbeing is safeguarded.

East Suffolk Council Healthy Environments Supplementary Planning Document

- 14.41 The SPD⁵³ provides detailed guidance to support the implementation of Local Plan policies relating to health, wellbeing, green infrastructure, active travel, healthy homes, community facilities, and lifetime neighbourhoods.

⁵¹ <https://www.suffolk.gov.uk/asset-library/imported/suffolk-green-access-strategy-2020-2030.pdf>

⁵² <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

⁵³ <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf>

Local Impact Assessment

Construction Phase Impacts

Positive

- 14.42 None identified.

Neutral

- 14.43 Impact of surface infrastructure and underground cables: Electromagnetic fields.
- 14.44 The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.

Local Employment

- 14.45 The construction phase of the Proposed Project is expected to generate temporary employment, with an average of around 86 direct jobs per year and a peak workforce of 327. Given the specialist nature of many roles, approximately 30% of these positions are anticipated to be filled by residents within the study area. While this represents a modest proportion, it nonetheless brings some economic benefit to the local area, supported by indirect employment through the supply chain and spending by workers.
- 14.46 Access to good quality employment is an important determinant of health and wellbeing, providing income security, opportunities for social connection, and a sense of purpose. These positive effects would be experienced primarily by the locally recruited workforce, and SCC welcome this contribution to community wellbeing. However, the predominance of non-local workers could limit these localised benefits and place additional pressure on housing and community services.
- 14.47 Construction traffic and abnormal loads may also affect travel routes used by local businesses, leading to congestion, delays, and reduced accessibility for customers and suppliers. Businesses situated close to the Order Limits may experience both opportunities and challenges, benefiting from increased demand for accommodation and local services, but also facing potential disruption from noise, access changes, and short-term impacts on amenity.

Negative

Impact on access and use of PRowS and social infrastructure

- 14.48 Temporary or permanent closures, diversions, or reductions in amenity and access to social infrastructure, the PRow network and green and blue spaces, combined with increased traffic, noise, and other construction related disturbances, have the potential to adversely affect community health and

wellbeing. These impacts are likely to be most pronounced for older people, those with limited mobility, and residents without access to private transport. Such disruptions risk widening existing health inequalities, as those already experiencing barriers to good health are likely to be disproportionately affected by the loss of accessible, low-cost opportunities for activity and social engagement.

- 14.49 These spaces and routes provide important opportunities for physical activity, recreation, and social connection, all of which are recognised determinants of good physical and mental health. PRoWs and green/blue spaces in particular enable informal activity such as walking, cycling, and nature-based recreation (e.g. birdwatching), supporting cardiovascular fitness and overall wellbeing without the need for structured exercise.
- 14.50 The Applicant's assessment ([APP-058], paragraphs 11.9.53–11.9.59), acknowledges that construction traffic associated with the Suffolk Onshore Scheme may increase community severance between neighbourhoods, reducing access to community facilities and social interaction, and that the population's sensitivity in this area is high given the relatively low baseline sense of community and rural tranquillity. However, the conclusion that the likely effects on transport, access, and social cohesion will be "*not significant* and *short-term*" appears optimistic. In practice, the combination of increased traffic, restricted access, loss of tranquillity, and the visual and noise intrusion of construction activity is likely to result in a more noticeable and enduring adverse effect on community wellbeing, particularly on mental health and sense of place.
- 14.51 These effects are expected to be exacerbated by the proposed lengthy working hours, including activities on Sundays and Bank Holidays, which limit opportunities for rest and leisure. Moreover, when considered alongside the cumulative influence of other NSIPs already underway or planned in the locality, the potential for sustained stress, fatigue, and erosion of social cohesion is likely to be greater than the assessment currently suggests. SCC therefore considers that residual impacts on wellbeing, social cohesion, and mental health may be understated in the Applicant's conclusions.

Impact of restricted access to health infrastructure

- 14.52 Disruptions in access to healthcare services can contribute to heightened stress and anxiety within the local population, compounding broader mental health and wellbeing impacts. These effects are likely to be further exacerbated during peak construction periods and further as a result of the proposed lengthy working hours. Construction activities associated with the Proposed Project may result in temporary or prolonged restrictions to key health infrastructure, including hospitals, GP practices, and pharmacies. Such restrictions could affect the ability of residents, particularly vulnerable

groups such as the elderly, disabled, or those with chronic conditions, to obtain timely care.

- 14.53 The Applicant's assessment ([APP-058], paragraphs 11.9.2–11.9.19) acknowledges that construction activities may temporarily restrict access to hospitals, GP practices, and other social infrastructure, and that increased traffic could contribute to community severance and inhibit access to healthcare facilities. The assessment concludes that the magnitude of effect would be '*negligible*' and '*not significant*' due to the limited duration of works, baseline capacity within local GP services, and the assumption that existing emergency services can absorb any additional demand.
- 14.54 While these factors are noted, SCC consider this conclusion to understate the potential real-world effects on community health and wellbeing. Even short-term disruption can have meaningful consequences for vulnerable residents, particularly in rural areas where alternative routes or transport options may be limited. The assumed resilience of healthcare access does not fully reflect the potential cumulative pressures arising from other NSIPs operating concurrently in the region, nor the additional stress and uncertainty that such disruption may generate among residents reliant on regular healthcare access.
- 14.55 SCC consider that the potential adverse effects on access to healthcare services, and the associated mental health and wellbeing implications, are likely to be greater than the Applicant's assessment suggests, particularly for older adults, those with limited mobility, or without access to private transport.

Public Mental Health

- 14.56 The consenting and construction of major infrastructure projects such as the Proposed Scheme can have significant and enduring impacts on the mental health and wellbeing of local residents. Changes to the local environment, including alterations to landscape character, increased noise, vibration, activity, and the presence or introduction of large-scale infrastructure, can diminish residents' sense of place, belonging, and control. Uncertainty surrounding the scale, duration, and nature of the works, as well as concerns about continued access to essential services, community facilities, social infrastructure and green/blue spaces, may contribute to heightened stress, anxiety, and reduced quality of life, particularly among vulnerable groups such as older people, disabled residents, and those without access to private transport.
- 14.57 The Applicant's assessment ([APP-058], paragraphs 11.9.85–11.9.86) concludes that the magnitude of impacts on health and wellbeing from social cohesion and community identity during the operational and maintenance phase would be *small* and therefore *not significant*. This conclusion appears to underestimate the likely extent and persistence of community level

stressors. It is not clear that the assessment has fully captured the psychological and social effects of long-term environmental change, including the perception of industrialisation of rural areas. This point is particularly pertinent to the Applicant's cumulative effects assessment on this receptor [APP-060] on account of the likely exacerbation of these effects in combination with the construction and operation of other major infrastructure projects with spatio-temporal overlap.

Working Hours

- 14.58 A particular concern for public health is the proposed construction working hours, which, as currently set out, would allow activities from as early as 07:00 -19:00 on weekdays plus a provision for start-up and close-down activities up to 1 hour either side of these core working hours, and from 07:00 – 17:00 on weekends and bank holidays. This leaves local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption. Continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities.
- 14.59 SCC note that the working hours proposed for Sea Link Development are less favourable than those applied to the Scottish Power Renewables (SPR) onshore transmission works. SPR DCO indicates core working hours of 08:00–18:00 Monday–Friday and 08:00–13:00 on Saturdays, with no works on Sundays or Bank Holidays, and a clear stipulation that start up and close-down periods must not involve activities likely to cause disturbance to local residents or businesses.
- 14.60 SCC considers that, since it is clear that the Applicant can deliver its project under Scenario 1 (which relies on the provision of the Friston sub-station via the SPR DCO(s)), and so abide by the working hours set out in the SPR DCO(s), there is no good reason why the Applicant should not also be able to deliver its project under Scenario 2 whilst abiding by those same working hours, at least as regards the works related to the Friston sub-station. SCC also considers that, irrespective of the SPR DCOs and whether Scenario 1 or Scenario 2 is applicable, there is a strong case for ensuring that there is community respite from construction activity and associated construction traffic on Saturday afternoons, and on Sundays and Bank Holidays.

Cumulative impacts

- 14.61 The potential for cumulative impacts, where multiple infrastructure projects are present or anticipated in the area, is also recognised as a factor that can

intensify feelings of frustration, loss of control, and diminished community cohesion. These effects are not limited to the physical environment but extend to the social and psychological wellbeing of individuals and the wider community.

- 14.62 The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are "minor adverse (not significant)" and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment does acknowledge that for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there is potential for significant cumulative effects during construction, operation, and decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific mitigation is confirmed for these cumulative effects.
- 14.63 [APP-060] identifies the potential for inter-project cumulative impacts on health and wellbeing, particularly linked to landscape and visual amenity, noise and vibration, traffic and transport, and social cohesion. However, the Applicant concludes that, because individual effects from each project are generally assessed as "minor adverse (not significant)" and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is "not significant." This conclusion is reached despite the recognition that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity. The Applicant should also acknowledge that it cannot be certain at present that peak construction periods of these projects will not overlap and that a reasonable worst-case scenario would account for the effects of such a scenario especially in relation to Sizewell C and the removal of the EA1N/EA2 haul road.
- 14.64 SCC considers that in respect of cumulative impacts, the approach within assessments [APP-058], [APP-059] and [APP-060] does not fully reflect the lived experience of affected communities, nor does it adequately account for the psychological and social impacts of prolonged uncertainty, repeated disruption, and the progressive industrialisation of the local environment. The cumulative sense of disruption, uncertainty, and loss of amenity, especially where multiple NSIPs are present or anticipated, can intensify adverse mental health outcomes beyond what is reflected in the Applicant's "minor adverse" classification. This is particularly relevant for vulnerable groups, including older people, disabled residents, and those without access to private transport, who may have fewer options for respite or alternative access to services and green spaces.

Community Engagement

- 14.65 Effective community engagement is fundamental to protecting and promoting public health in the context of major infrastructure projects. Meaningful engagement enables communities to understand, influence, and adapt to changes that may affect their environment, wellbeing, and daily lives. Research and local experience in Suffolk demonstrate that when communities feel excluded from decision making, or when engagement is limited to statutory minimums, there can be significant negative impacts on mental health and wellbeing, including increased anxiety, loss of trust, and a diminished sense of control and belonging. Conversely, early, honest, and continuous engagement can actively mitigate these impacts, giving a sense of agency, inclusion, and build resilience within affected communities.
- 14.66 The Applicant's Consultation Report [APP-301] demonstrates that national policy and statutory requirements for community engagement have been followed. However, while these measures may meet the legal baseline, SCC's SGD encourages project promoters to go further. Suffolk County Council has published a Supplementary Guidance Document (SGD) for NSIP developers about Community Engagement and Wellbeing, supporting its Energy and Climate Adaptive Infrastructure Policy. This guidance emphasises that effective engagement must go beyond statutory minimums, requiring project promoters to build relationships of trust, confidence, and understanding with local communities. SCC consider it essential for promoters to adopt a collaborative approach, involving the community meaningfully in the design and delivery of the project. Clear, comprehensive, honest, and open engagement throughout the consenting, construction, and decommissioning phases is vital to safeguarding community wellbeing, as it ensures residents feel listened to and that their views are genuinely considered. The SGD specifically recognises that the scale and pace of change, uncertainty about project impacts, and the cumulative effect of multiple infrastructure schemes can all contribute to significant mental health and wellbeing impacts.

Operational Phase Impacts*Positive*

- 14.67 None identified.

*Neutral**Electromagnetic fields*

- 14.68 Operational impacts related to Electrical infrastructure with associated Electrical and Magnetic forces are consistent with those described for the construction phase.

Local Employment

- 14.69 Minimal impact

Impact on access and use of PRowS and social infrastructure

14.70 Minimal impact

Impact of restricted access to health infrastructure

14.71 Minimal impact

*Negative**Public Mental Health*

- 14.72 The operation of the Proposed Scheme may continue to exert influences on the mental health and wellbeing of local residents and communities. Once operational, changes to the local environment such as visual intrusion, maintenance traffic movements, lighting, and changes in local air quality may alter residents' sense of place, comfort, and security. The permanent presence of large-scale infrastructure can transform local character and identity, potentially leading to feelings of loss, disconnection, or reduced satisfaction with the living environment. Concerns regarding long term environmental impacts, perceived risks to health and safety, or the fairness of who benefits from or bears the burdens of the scheme may also contribute to sustained anxiety, mistrust, or frustration among affected communities.
- 14.73 The potential for cumulative operational effects, particularly where multiple NSIPs or industrial developments coexist in the same area, is also a recognised stressor. Persistent noise, vibration, traffic, lighting, or landscape impacts from several projects can collectively erode community cohesion, amplify perceptions of neglect or inequity, and intensify feelings of fatigue or resignation. These effects extend beyond physical nuisance to encompass deeper psychosocial effects, including a diminished sense of agency and belonging.
- 14.74 Suffolk County Council's Supplementary Guidance Document (SGD)⁵⁴ for NSIP developers on Community Engagement and Wellbeing remains relevant throughout operation, emphasising that developers have an ongoing responsibility to maintain transparent communication and responsive engagement with communities. Continued monitoring, timely dissemination of information about operational impacts, and accessible channels for feedback or complaint resolution are essential to supporting mental health and sustaining public trust. The Council's approach emphasises that proactive, empathetic, and enduring engagement is critical in ensuring that operational impacts do not undermine the long-term wellbeing, resilience, and cohesion of local communities.

⁵⁴ <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

Decommissioning Phase Impacts

Positive

14.75 None identified.

Neutral

Electromagnetic fields

14.76 Decommissioning impacts related to Electrical infrastructure with associated Electrical and Magnetic forces are consistent with those described for the construction phase.

Local Employment

14.77 Decommissioning impacts related to local employment are consistent with those described for the construction phase.

Negative

Impact on access and use of PRowS and social infrastructure

14.78 Decommissioning impacts related to access and use of PRowS and social infrastructure are consistent with those described for the construction phase.

Impact of restricted access to health infrastructure

14.79 Decommissioning impacts related to access to health infrastructure are consistent with those described for the construction phase.

Public Mental Health

14.80 Decommissioning impacts related to Public Mental Health are consistent with those described for the construction phase.

Required Mitigation

Impact of surface infrastructure and underground cables: Electromagnetic fields

- 14.81 No mitigation required

Local Employment

- 14.82 The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at project level, as they do not consider this to be an efficient or effective approach (Chapter 10, Socioeconomics, Recreation and Tourism, March 2025, Table 10.1). SCC do not agree with this conclusion.
- 14.83 To maximise the positive economic and health impacts of the Proposed Project, SCC believe the Applicant should develop and implement a Local Employment and Skills Plan prepared in collaboration with SCC. The plan should include clear and measurable commitments to prioritise local labour and supply chain engagement and to deliver targeted skills, training, and apprenticeship programmes aligned with Suffolk's Economic Strategy / Local Growth Plan. It should also include a robust monitoring and reporting framework to demonstrate progress, ensure accountability, and enable management of commitments throughout the construction phase.
- 14.84 Ongoing engagement with affected businesses, particularly those close to the Order Limits, should be maintained to ensure that concerns about access, amenity, and service disruption are addressed in a timely manner.
- 14.85 Further information on this issue can be found in the Socioeconomics, Recreation and Tourism section of this Local Impact Report.

Impact on access and use of PRowS and social infrastructure

- 14.86 SCC are satisfied that the mitigations set out in the Construction Environmental Management Plan provide a reasonable framework to minimise the effects of reduced or restricted access and amenity during the project phases from a public health perspective. These measures collectively support the safeguarding of public wellbeing by ensuring that PRowS and access routes are subject only to short duration closures with clear signage and advance communication, and that reinstatement is carried out promptly to at least the original condition, supported by pre-condition surveys and photographic records. SCC also recognises that a Public Rights of Way Management Plan must be approved by the relevant discharging authority before construction can commence. This plan must be robust in order to minimise the effects on PRowS as far as possible.
- 14.87 Nonetheless, SCC recognises that, even with these measures in place, there will be an unavoidable residual negative impact on local access, amenity, and community wellbeing relative to the existing baseline. While the proposed mitigations will reduce disruption, they cannot eliminate it entirely.

Consequently, the overall effect on local residents, visitors, and businesses during the construction period is expected to remain adverse.

- 14.88 Mitigation measures related to core working hours are set out below under title ‘Working Hours.’

Impact of restricted access to health infrastructure

- 14.89 To minimise these impacts of disrupted access to healthcare services, SCC expect the Applicant to embed and monitor measures outlined in relevant plans including the outline CTM&TP, outline CoCP, and outline PRoW management plan. Early engagement with affected communities, healthcare providers, and local authorities will be essential.
- 14.90 The Applicant should coordinate construction schedules to reduce disruption, including coordination with other NSIPs underway or planned in the area, with clear communication to affected communities and healthcare providers on planned works. Where closures or diversions are unavoidable, temporary access arrangements, alternative routes and/or shuttle services must be provided. The Applicant should commit to minimising the duration of restricted access and ensure robust monitoring to address unforeseen issues promptly.
- 14.91 Notwithstanding these measures, SCC recognise that residual adverse effects on access to healthcare services are unavoidable when compared to the existing baseline. While the proposed mitigations will reduce the scale and duration of disruption, they cannot fully offset the inconvenience and potential access challenges experienced by patients, staff, and emergency responders during construction.
- 14.92 Mitigations measures related to core working hours are set out below under title ‘Working Hours.’

Public Mental Health

Working hours

- 14.93 To effectively mitigate the effects of prolonged construction disturbance on community wellbeing, SCC expect the Applicant to revise the proposed core working hours to minimise avoidable noise, vibration, and disruption and protect public mental health. Construction activity should be limited to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC.
- 14.94 Start-up and close-down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses.

Cumulative Impacts

- 14.95 Mitigations are required to address cumulative impacts identified in Document 6.2.2.12, where no specific measures are currently confirmed. A robust mitigation strategy should be secured through the DCO and embedded in the CEMP, with design and monitoring undertaken in partnership with affected communities. This must include participatory engagement and adaptive monitoring throughout construction, operation, and decommissioning to ensure timely response to emerging wellbeing risks. The Applicant should seek to coordinate with the promoters of nearby projects to minimise cumulative impacts.

Community Engagement

- 14.96 Whilst SCC welcomes the commitment within the REAC [APP-342] regarding community liaison, it is not sufficient to address the full range of community wellbeing and mental health impacts associated with the project as set out in this chapter. To aid in mitigating these effects, community engagement should go beyond the REAC focus on providing information and a procedure for complaints. SCC expects the Applicant to implement the following measures, as set out in Suffolk County Council's Community Engagement and Wellbeing Supplementary Guidance Document:
- i. **Appoint a dedicated 'relationship manager'** - an impartial, consistent point of contact for the community, to facilitate dialogue, address concerns, and provide timely, high quality, and accessible information.
 - ii. **Engage in regular, face-to-face conversations** with community leaders, parish councils, and residents, ensuring technical information is explained clearly and that feedback mechanisms are in place and responsive.
 - iii. **Invest in local community assets** (such as public spaces, village halls, or community organisations) as a form of mitigation and compensation, with assets identified in close collaboration with the community itself.
 - iv. **Support community mental health and resilience** by funding local mental health organisations, providing Mental Health First Aid training for community members, and promoting resources such as East Suffolk Council's WellMinds.
 - v. **Adopt the SGD's principles of early, honest, and continuous engagement**, including the creation of a community panel to participate in project design, and the use of participatory monitoring and adaptive management to track and respond to wellbeing impacts over time.
 - vi. **Provide clear information on compensation and discretionary purchase schemes**, ensuring that access to support does not create undue administrative burden or anxiety for affected individuals.

- vii. **Monitor and evaluate community wellbeing** using established tools (such as the Suffolk Emotional Needs Audit) and adapt engagement and mitigation strategies in response to feedback and changing community needs.

15 Draft Development Consent Order

Summary

- 15.1 In October 2024, the Council commented on an early draft of the dDCO and provided comments on NGET’s response in January 2025. While NGET has made several of the changes suggested, the Council remains concerned about numerous matters.
- 15.2 It will be noted that references to certain DCO provisions are included in the preceding chapters and should be read alongside this chapter.

Article 2(1) (interpretation)

- 15.3 The definition of “maintain” includes the replacement of any or all of the authorised development. SCC would like to know to what extent “replacement” has been assessed and where this is considered in the Environmental Statement.

Article 2(1) (interpretation)

- 15.4 The definition of “permit scheme” means a permit scheme in force on the date on which the Order is made. SCC consider the definition should allow for the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.

Article 2(1) (interpretation)

- 15.5 The definition of “pre-commencement operations” is wide-ranging and goes well beyond the “minor set up operations ... which are either de minimis or have minimal potential for adverse impacts” referred to in paragraph 4.6.12 of the Explanatory Memorandum (“EM”) [AS-090]. SCC would like to know –
- i. how each operation will be controlled (especially the “set up works associated with the establishment of construction compounds” (sub-paragraph (m)) and “temporary accesses” (sub-paragraph (n)).
 - ii. which buildings are proposed to be demolished as part of the “pre-commencement operations” (sub-paragraph (i)),
 - iii. the relevant paragraphs of the ES which deal with the assessment of these works. (This request is made in the context of paragraph 4.6.14 of the EM [APP-090] which states: “The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, National Grid considers that the exclusion of these works and operations from the definition is appropriate.”).

- 15.6 SCC notes that several of the excluded works are temporary works. For example: temporary accesses (sub-paragraph (n)); erection of any temporary means of enclosure or temporary demarcation fencing marking out site boundaries (sub-paragraph (o)); and the temporary display of site notices or advertisements (sub-paragraph (p)). Requirement 9(1) (reinstatement schemes) states “any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use ...”. Would each of the excluded temporary works fall within Requirement 9(1)? If not, why not?
- 15.7 Regarding “temporary accesses” (sub-paragraph (n)), SCC’s highways team would welcome as much information as possible regarding any temporary works which would affect the Consultee’s highways and expects the provision of any “temporary accesses” to be controlled in protective provisions or in a highways side agreement. Please can the Applicant confirm this will be the case.

Article 7 (consent to transfer benefit of Order)

- 15.8 This article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable and that the dDCO is updated to reflect this.

Article 10(2) (planning permission and other consents)

- 15.9 This provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the Applicant would confirm whether it has any specific planning permission or DCO in mind.

Article 11(1) (street works)

- 15.10 Absent a suitable highways side agreement or protective provisions to protect SCC’s highways interests, SCC considers art.11(1) should be subject to the street authority’s consent.
- 15.11 The same point applies in respect of the following articles: 14(1) (power to alter layout, etc. of streets), 15(1) (temporary closure of streets and public rights of way and permissive paths), 16(1) (permanent stopping up of streets and public rights of way) and 17(1)(a) (access to works).

Article 11(2) (street works)

- 15.12 Under several of the draft DCO’s articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to

say that approval must not be “unreasonably withheld or delayed” and there is also a provision that it is deemed to be given after 35 days.

- 15.13 SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be “unreasonably withheld or delayed” and so these words should be removed from article 11(2).
- 15.14 SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2), 15(5)(b) (temporary closure of streets and public rights of way and permissive paths), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 22(5) (authority to survey and investigate the land), 50(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).

Article 11(3) (street works)

- 15.15 Provides that if a street authority fails to respond to an application for consent within 35 days of the application being made, that street authority is deemed to have given its consent.
- 15.16 While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented⁵⁵. A 35-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.
- 15.17 Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 35 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.
- 15.18 SCC requests that 35 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 15(9) (temporary closure of streets and public rights of way and permissive paths); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 50(9) (traffic regulation) and 51(5) (felling or lopping).

⁵⁵ For example: East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission’s Norwich to Tilbury application and National Grid Interconnector Holdings Limited’s LionLink Interconnector application.

- 15.19 A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.

Article 12(2)(d) (application of the permit schemes)

- 15.20 This provision prohibits “**the relevant street authority**” from permitting certain works at a certain time but then says “**local highway authority**” may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term “local highway authority” is not a defined and, in the articles, is only used in the definitions of “relevant highway authority” and “relevant street authority” (article 2(1). In articles 12(3), (4) and (5) “**the relevant highway authority**” is referred to and SCC wonders whether that term should also be used (whether once or twice) in article 12(2)(d). SCC would welcome the Applicant’s explanation on this drafting point.

Article 13(3) and (4) (application of the 1991 Act)

- 15.21 SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).

Article 15 (temporary closure of streets and public rights of way and permissive paths)

- 15.22 By article 15(1), the undertaker may, “for any reasonable time” divert traffic from the street or public right of way; and prevent all persons from passing along the street or public right of way or permissive path. SCC would welcome more information as to what “a reasonable time” might be.
- 15.23 In addition, SCC considers that article 15 should provide that any temporary diversion specified in column (4) of Part 1 of Schedule 8 (streets, public rights of way and permissive paths to be temporarily closed) must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.

Article 15(5)(b) (temporary closure of streets and public rights of way and permissive paths)

- 15.24 This provision refers to the street authority’s ability to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 41(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for clarity and consistency, SCC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e.g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 15(2) (temporary closure

of streets and public rights of way and permissive paths), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 50(2) (traffic regulation), and 51(4) (felling or lopping).

Article 19(1)(b) (agreements with street authorities)

- 15.25 This provision allows the street authority and undertaker to enter into agreements with respect to “the maintenance of the structure of any bridge or tunnel carrying a street over or under an electric line authorised by this Order.” SCC’s concerns regarding the Applicant’s proposals for the Benhall Bridge have been set out elsewhere in this Local Impact Report. Those concerns are not repeated here; suffice to say that, in the light of them, and particularly for safety reasons, SCC considers that no works should be carried out on the Benhall Bridge (or the approaches to it) without the consent of SCC, or without an agreement being entered into in respect of those works. It will be noted that article 23(3) (agreements with street authorities) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) prohibits the undertaker from commencing certain works prior to the Applicant entering into a highways side agreement under article 23 with the highway authority. A similar approach should be followed here. SCC would therefore propose the inclusion of a new paragraph after paragraph (1) of article 19 which states –

“(1A) The undertaker must not commence Work No.3A (access road to the Suffolk Converter Station) prior to entering into an agreement with respect to it pursuant to this article with the street authority”.

Article 33(1) (time limit for exercise of authority to acquire land and rights compulsorily)

- 15.26 SCC considers allowing the Applicant seven years to issue ‘notices to treat’ or a ‘general vesting declaration’ to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position, and SCC considers the usual position should be adopted here, especially since (per article 33(4)) that period will not be eaten into by any legal challenge to the decision to grant development consent for the project. Moreover, per requirement 2(1) (time limits) the undertaker has five years to commence the authorised development, and SCC would usually expect this period to be the same as that in article 33(1).

Article 50(4) (traffic regulation)

- 15.27 This provision refers to the “instrument” made under paragraph (1) or (2) of article 50. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest the inclusion of a new article 50(10), drafted as follows –

“(10) A copy of the instrument referred to in paragraph (4) must be held at the registered office address of the undertaker for inspection during normal working

hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority”.

Article 51 (felling or lopping)

- 15.28 SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage prior to replanting, instead of removal. In any event, SCC notes the following from *Advice Note Fifteen: drafting Development Consent Orders*: “...the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority” (paragraph 22.1).
- 15.29 Regarding “a plan to specifically identify the hedgerows to be removed,” while the Applicant has prepared “Trees and Hedgerows to be Removed or Managed Plans” it is not clear those plans apply to all hedgerows or important hedgerows to be removed, and SCC would welcome clarification on this point.
- 15.30 Regarding consent, only trees “within or overhanging the extent of the public highway” (and not those included in the “Trees and Hedgerows to be Removed or Managed Plans”) are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might seek the amendment of this article to include a more general consent provision.

Article 52 (trees subject to tree preservation orders)

- 15.31 By section 206(1)(a) of the Town and Country Planning Act 1990, where a tree for which a tree preservation order is in place is removed, uprooted or destroyed in contravention of the order, the landowner must plant another tree of an appropriate size and species at the same place as soon as he reasonably can. Article 52(3) of the dDCO disapplies section 206(1). SCC considers this disapplication must be justified in the EM [AS-090]. Moreover, SCC considers arrangements should be made in the dDCO or in a control document to replace each tree that is lost at a ratio of three for one, and that suitable locations for these re-placement tree must be found.

Schedule 1 (authorised project)

- 15.32 SCC considers that each of Work Nos. 1 to 5 should including soft landscaping.

Schedule 3 (requirements) (paragraph 1 (interpretation))

- 15.33 In paragraph 1(1), the definition of “authorised development” is not needed because the term is already defined in article 2 (interpretation) which states the definition applies to the (whole) Order, which includes Schedule 3. A similar point applies to the definition of “limits of deviation,” which is included in article 2 and paragraph 1(1) of Schedule 3. (The definitions here are slightly different: the one in article 2 refers to the limits “shown on the Works Plans” while the one in Schedule 3 does not).

Schedule 3 (requirements) (paragraph 1 (interpretation))

- 15.34 Paragraph 1(1) defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. The definition is circular and unhelpful. Requirement 4 (construction management plans) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions⁵⁶ and one of the six tests for conditions is precision⁵⁷. SCC consider the inclusion of “discharging authority” in requirement 4 creates imprecision and requests that the Applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named. A similar drafting approach has been followed in the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and that drafting has already caused confusion post-consent for SCC. SCC is keen to avoid any confusion in respect of this Order.

Schedule 3 (requirements) (paragraph 1 (interpretation))

- 15.35 Paragraph 1(1) defines “start-up and close down activities”. Two drafting points: (1) No hyphen is used in “start up and close down activities” in requirement 7(5) and there should be consistency in the drafting and (2) Since this term is only used in requirement 7(5), the definition should be moved to that requirement after paragraph (6) i.e. in the same way that “controlled waters” is defined at the end of requirement 10(3) (contaminated land and controlled waters).

Schedule 3 (requirements) (paragraph 1 (interpretation))

- 15.36 Because certain requirements provide for the approval or agreement of the relevant highway authority (for example requirement 7(3) (construction hours) and requirement 8(3) (highway works), paragraph 1(2) should be amended as follows –

⁵⁶ Section 120(2)(a) Planning Act 2008.

⁵⁷ Circular 11/95: Use of conditions in planning permission (paragraph 14).

“(2) Where under any of the Requirements the approval or agreement of the **relevant highway authority or the** relevant planning authority is required, that approval or agreement must be given in writing”.

Schedule 3 (requirements) (requirement 2(2) (time limits))

- 15.37 A drafting point. SCC consider this provision should be amended as follows – “If any proceedings are begun to challenge the validity of this Order, the period specified in sub-paragraph (1) is extended by a period equivalent to the period beginning with the day the application to challenge is made and ending on the day it is withdrawn or finally determined”.

Schedule 3 (requirements) (requirement 3 (converter station design))

- 15.38 Requirement 3 refers to “the Key Design Principles set out in the Converter Station Design Principles”. What is the status of the documents which include the Design Principles (Suffolk: [APP-366], Kent: [APP-367])? Neither is referred to elsewhere in the dDCO and SCC would suggest they should be defined and included in the schedule of certified documents. SCC would therefore suggest that existing requirement 3 is renumbered paragraph (1) and a new paragraph (2) is included in requirement 3 which includes a definition of the document e.g. –

“(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60 (certification of documents) by the Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order”.

- 15.39 In Schedule 19 (certified documents) to the dDCO, “Design Principles – Suffolk” and “Design Principles – Kent” should then be added to the list of documents.

Schedule 3 (requirements) (requirement 4(1) (stages of authorised development))

- 15.40 Requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. This is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC’s experience of discharging requirements under that Order has shown the time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days. This point is touched on again in paragraph 15.43 below.

Schedule 3 (requirements) (requirement 4(4) (stages of authorised development))

- 15.41 Provides for notice of the completion of each stage of the authorised development to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for

this information to be provided and considers it should be provided in less time. For example, 14 days is the period stated in the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958).

Schedule 3 (requirements) (requirement 5 (construction management plans))

- 15.42 SCC considers this provision could be drafted more concisely, for example –
- “(1) All construction works forming part of the authorised development must be carried out in accordance with the Greenhouse Gas Reduction Strategy and the Red Throated Diver Protocol, unless otherwise agreed with the relevant planning authority.
- (2) All pre-commencement operations must be carried out in accordance with the documents named in sub-paragraph (1) and the outline management plans listed in paragraph 6(1) below, unless otherwise agreed with the relevant planning authority”.
- 15.43 If the Applicant considers another “discharging authority” should have a role in discharging this requirement, that authority should be named in the requirement.

Schedule 3 (requirements) (requirement 5(3) (construction management plans))

- 15.44 As mentioned in paragraph 15.39 above, SCC considers that the requirement – under requirement 4(1) (stages of the authorised development) – for notifications for pre-commencement works to be submitted seven days prior to those works taking place is an unreasonably short period of time. Requirement 5(3) states that pre-commencement operations must be carried out in accordance with the outline management plans listed in Requirement 6(1). The set of activities permitted under the definition of “pre-commencement activities” and the outline management plans is extensive. The relevant authority receiving a pre-commencement notification does not have time to ensure that the pre-commencement notification is valid and the activities are being undertaken in accordance with the outline management plans. There is no option for recourse if the pre-commencement activities do not satisfy the requirements of the DCO after the seven-day period has expired. A longer period of 35 days would be preferable.

Schedule 3 (requirements) (requirement 6(1) (construction management plans to be approved))

- 15.45 Again, for clarity, the reference to “or other discharging authority as may be appropriate to the relevant plan” should be replaced with the name of the authority the Applicant has in mind. For instance, the subject matter of the following documents fall within SCC’s statutory responsibilities, and it would be appropriate for SCC to approve these –

(c) Construction Traffic Management and Travel Plan – Suffolk (which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan – Suffolk).

(k) Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk).

(q) Material and Waste Management Plan.

(r) Drainage Management Plan; and

(s) Flood Management Plan

- 15.46 In respect of the documents mentioned in sub-paragraphs (q), (r) and (s), it is not clear why no outline document is being provided. No explanation is provided in the EM **[AS-090]** at paragraph 5.3.10 (which concerns requirement 6).

Schedule 3 (requirements) (requirement 7 (construction hours))

- 15.47 This provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S.I.2022/432). Requirement 24 of that Order states the core hours are “between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays”, subject to certain exceptions listed in sub-paragraph (2). SCC’s proposed amendments to requirement 7 include the following.
- 15.48 Requirement 7(1) should be amended as follows –
- “Subject to sub-paragraphs (2), (3) and (4) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and between 08.00 and 13.00 on Saturdays, unless otherwise approved by the relevant planning authority”.
- 15.49 Requirement 7(2) should be recast as follows –
- “No percussive piling works may take place outside of the hours of 07.00 to 19.00 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant planning authority.”
- 15.50 Requirement 7(3) should be recast as follows –
- “Subject to sub-paragraphs (4), no HGV deliveries may be made to site outside of the hours of 07.00 to 19.00 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant highway authority”.
- 15.51 Requirement 7(4)(a) should be omitted.

- 15.52 Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. For example, requirement 7(3)(g) of the Bramford Order states –

“(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1)—

...

(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities **that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)**”; [Words not included in the instant dDCO [AS-088] shown bold and underlined].

- 15.53 SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the instant dDCO [AS-088].
- 15.54 Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. For example, requirement 7(4) of the Bramford Order states –
- 15.55 “The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. **A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours**”.
- 15.56 SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the instant dDCO [AS-088].

Schedule 3 (requirements) (requirement 8(1) (retention and protection of existing trees and hedgerows)

- 15.57 This provision refers to an Arboricultural Method Statement, which must be submitted to and approved by the relevant planning authority before any stage of the authorised development can commence. Can an outline version be submitted to examination? (No explanation for its absence is included in the EM [AS-090] (paragraph 5.3.16, which concerns requirement 8).

Schedule 3 (requirements) (requirement 9(2) (reinstatement schemes))

- 15.58 This provision states –

“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”.

- 15.59 It would be helpful if the EM [AS-090] could explain why this provision is needed. Currently, no explanation is given (paragraph 5.3.17 concerns requirement 9).

Schedule 3 (requirements) (requirement 10(1) (contaminated land and controlled waters)

- 15.60 This provision states –

“If during any stage of the authorised development, contamination within the Order Limits is identified as a result of the confirmatory ground investigations, and this contamination is **considered likely to cause a significant possibility of significant harm to persons** or pollution of controlled waters or the environment then, except in the case of emergency, no further development in the vicinity of the contamination may be carried out until a written scheme to identify the extent of the contamination and identify mitigation and remedial measures to be taken to render the land fit for its intended purpose has been submitted to and approved by the relevant local planning authority, following consultation with the Environment Agency”. [Emphasis added].

- 15.61 The equivalent provision of the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (SI 2024/393) – requirement 12 – refers to contamination which is “**considered to present a significant possibility of significant harm to persons ...**”. Is there a difference between “**considered to present a significant possibility**” and “**considered likely to cause a significant possibility**”? Why has the drafting been changed here?

Schedule 3 (requirements) (requirement 10(2) (contaminated land and controlled waters)

- 15.62 SCC considers the following drafting amendment is required here –

“Should mitigation or remedial measures be required then they must be carried out in accordance with the approved scheme referred to in sub-paragraph (1) and, if remedial measures are required, their implementation and validation **must be** documented in a verification report submitted to the relevant planning authority”.

Schedule 3 (requirements) (requirement 12(1) (highway works))

- 15.63 This provision refers to the “local highway authority,” an undefined term. SCC assumes the term should be the “relevant highway authority,” which is defined in article 2(1) (interpretation). (“Relevant highway authority” is also the term used in requirements 1(4) (interpretation) and 12(3) (highway works).

Schedule 3 (requirements) (requirement 13(1) (decommissioning))

- 15.64 This provision provides for the decommissioning of the authorised development, save for substations. What will happen to the substations? (Paragraph 5.3.21 of the EM [AS-090], which concerns requirement 13 does not explain).

Schedule 3 (requirements) (requirement 14(1) (archaeology))

- 15.65 This provision names “the relevant planning authority” as the discharging authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedented. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.

Schedule 3 (requirements) Emergency Planning Arrangements

- 15.66 SCC has a statutory duty under Radiation Emergency Preparedness and Public Information Regulations 2019 (REPIR 19) to consider the impacts of the development with respect to the existing contingency arrangements contained in the Sizewell B Off-site Radiation Emergency plan.
- 15.67 The Sea Link network sits outside the Sizewell B nuclear power station Detailed Emergency Planning Zone (DEPZ – approx. 4.5km), but within the existing Extended and Outline Emergency Planning Zone (EEPZ – 15km and OPZ – 30km). The Sizewell B radiation emergency planning assumptions assumes that following an Off-Site Nuclear Emergency (OSNE), immediate action to protect the public will be required within 12hrs for those within the EEPZ.
- 15.68 Before construction commences the Applicant will need to develop emergency planning measures to respond to an emergency at the Sizewell B nuclear power station. To achieve this, the Applicant will need to liaise directly with the SCC Duty Holder for off-site radiation emergency arrangements. The measures will need to cover arrangements for protecting construction staff across all locations during a radiation emergency and show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.
- 15.69 The EA1N and EA2 DCOs include Requirement 33 – Emergency Planning Arrangements which obliges the promoters to submit an Emergency Plan to be approved in accordance with the relevant Radiation Emergency Preparedness Regulations before construction of onshore works can commence. Wording similar to this requirement could be used for the Sea Link DCO given the similarities in contexts for the purposes of emergency planning in relation to Sizewell B. Requirement 33 of the EA1N and EA2 DCOs reads as follows:

15.70 33.—(1) *No part of the relevant works shall commence until the Suffolk Resilience Forum Radiation Emergency Plan has been reviewed to account for the relevant works or part thereof and reissued in accordance with the relevant Radiation Emergency Preparedness Regulations.*

(2) Emergency planning arrangements specified within the Suffolk Resilience Forum Radiation Emergency Plan in respect of the relevant works shall be implemented in relation to the relevant part of the relevant works, unless otherwise agreed with Suffolk County Council after consultation with the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate.

(3) For the purposes of this requirement—

(a) “the relevant works” means— (i) the onshore preparation works; (ii) the onshore works; and (iii) to the extent that they are within the Sizewell B Detailed Emergency Planning Zone, the offshore works.

(b) “the relevant Radiation Emergency Preparedness Regulations” means the Radiation (Emergency Preparedness and Public Information) Regulations 2019(a) as amended from time to time; and

(c) “the relevant Sizewell B Detailed Emergency Planning Zone” means the Sizewell Detailed Emergency Planning Zone detailed within the Suffolk Resilience Forum Radiation Emergency Plan.

Schedule 4 (discharge of requirements) (paragraph 1, timescales)

15.71 The timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in *Advice Note Fifteen: drafting Development Consent Orders*. The EM [AS-089] justifies the shorter timescales as follows –

“Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from the 42 day period which is recommended in Appendix 1 of Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. These shorter time limits are preceded in other made Orders including the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. (paragraph 5.4.2).

15.72 This argument is unconvincing. The 35-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect “the immediate and pressing national need which the project is intended to address”. It will be noted that a longer period than 35 days has been considered appropriate for

other Suffolk-based energy NSIPs, which are Critical National Priority Infrastructure: (i) Sizewell C (Nuclear Generating Station) Order 2022(SI 2022/853) – 6 weeks (i.e. 42 days), and 8 weeks (i.e. 56 days) if there are named consultees: paragraph 1 of Schedule 24 (ii) East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432) – 56 days where no further information is requested and 42 days where further information is requested: paragraph 1 of Schedule 16 and (iii) East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433) – 56 days where no further information is requested and 42 days where further information is requested: paragraph 1 of Schedule 16. Furthermore, the time for determining applications for the discharge of requirements under the Sunnica Energy Farm Order 2024 (SI 2024/802) is 56 days (paragraph 2 of Schedule 13).

- 15.73 While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 35 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, SCC consider a 56-day decision-making period would be reasonable.
- 15.74 Paragraph 5.4.3 of the EM [AS-089] says this schedule is “based on Schedule 4 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 ...”. The equivalent period in the Bramford Order is 35 days. SCC’s experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. For example, in SCC’s experience, the provision of 35 days, as opposed to 56 days, has been counterproductive to the prompt delivery of energy infrastructure projects. 56 days allows the discharging authority to ensure that consultees, including statutory consultees, respond within the decision period with enough time for any objections to be resolved with the Applicant. When the decision period is only 35 days, SCC has found that there is insufficient time for objections to be resolved resulting in extensions of time being agreed or applications being rejected. In either case, the Applicant’s delivery programme is compromised due to delay. On occasion, this has resulted in Applicants rushing to make amendments which do not address the issues raised, resulting in further amendments needed to allow the requirement to be discharged. This sometimes leads to the decision period being extended beyond 56 days. SCC has not encountered this problem where it has 56 days to decide applications which rarely, if ever, require extensions of time. Therefore, SCC considers that a decision period of 56 days to be more conducive than 35 days to the delivery of critical energy infrastructure.

Schedule 4 (discharge of requirements) (paragraph 2, further information)

- 15.75 SCC considers the provisions for requesting further information to be insufficient. As drafted, the discharging authority is permitted only 7 days to request further information otherwise it is considered to have sufficient information. This is an unreasonable burden to place on the discharging authority. Deciding whether further information is needed requires an extensive review of the submitted documents by officers of various technical disciplines which is simply unfeasible to complete in 7 days. The Order makes provision of 35 days to decide applications, the bulk of which is spent reviewing the submitted documents to reach a conclusion of whether they fulfil the obligations set out in the requirement. It is only once the documents have been thoroughly reviewed that it can be decided whether an application includes sufficient information for the requirement to be discharged. There is no limit to how many applications can be submitted to a discharging authority at once meaning it is possible for the discharging authority to be expected to review multiple applications amounting to hundreds of pages of technical detail in just 7 days. Therefore, SCC considers a more reasonable time limit of 21 days would give the discharging authority adequate time to decide whether an application contains sufficient information.

Schedule 4 (discharge of requirements) (paragraph 3, fees)

- 15.76 The first point to make is that while SCC will be required to deal with applications for consent under articles and under requirements, by paragraph 3(1) of Schedule 4, a fee is only payable in respect of requirements. SCC considers that fees should also be paid for dealing with applications under articles and requirements. SCC's approach here is consistent with the standard drafting for a provision dealing with procedure for the discharge of approvals, as set out in Appendix 1 to PINS Advice Note 15, which concerns drafting DCOs.
- 15.77 The second point to make is that the proposed fee is unreasonably low. Paragraph 3(1) says a fee must be paid as follows –
- “(a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or
- (b) a fee of £145 per request”.
- 15.78 Regarding (a), this is an application for a nationally significant infrastructure project under the Planning Act 2008, not for (say) a garage extension under the TCPA 1990. The fee should reflect the work involved.
- 15.79 Turning to (b), £145 per application is lamentably and unreasonably low. If we assume an hourly rate of £100 for an officer to deal with this work, the fee under (b) would mean the officer would have to deal with any discharge application within around 90 minutes before dealing with the application started to cost the local authority money. It is unlikely that any application will

be capable of determination within that period. While the Council cannot make a profit for this work, it is reasonable for it to seek the full recovery of the actual costs incurred. The Applicant's approach here is wholly unfair.

- 15.80 This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 1 of Schedule 4, the Council will have 35 days to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. The same applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for SCC, diverting officer resource from other matters. The inclusion of the deeming provision and its effects on SCC resourcing is another reason SCC considers its full costs for this work should be covered by the Applicant.
- 15.81 Rather than the regime currently proposed in the Order, SCC considers it would be preferable if the Applicant and SCC entered into a planning performance agreement ("PPA") for the full recovery of SCC's costs in discharging any application under the Order.

END OF DOCUMENT