



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

9.76.5 Change Request: Addendum to Volume 6 Environmental Statement

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nationalgrid

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Non-Technical Summary

Ex1.1 Introduction

- Ex1.1.1 A review has been undertaken to determine whether the five proposed changes to the Proposed Project considered in the Change Request would result in new or different likely significant environmental effects compared to those reported in the submitted Environmental Statement (ES) and subsequent chapter updates. The review also considered whether conclusions in other Volume 6 assessments submitted with the Development Consent Order (DCO) application and relevant control documents (Volume 7) require amendment. The findings for each proposed change are summarised below.

Ex1.2 Change 1: Change to access at the Hoverport, Kent

- Ex1.2.1 ***Change 1: Change to access at the Hoverport, Kent*** refers to the extension of the Order Limits at the Hoverport in Pegwell Bay to provide flexibility in terms of an access route to the intertidal area to enable the encroaching saltmarsh habitat to be avoided. The extent of saltmarsh and its migration is addressed within **Application Document 9.76.5.1 Appendix A: Saltmarsh Technical Note** submitted at Deadline 1A and this has informed the review of environmental effects resulting from this proposed change.
- Ex1.2.2 No new or different likely significant effects have been identified as a result of Change 1 across all the ES topics and Volume 6 assessments. The widened access area remains within the same landscape character area and visual envelope; and ecological effects remain unchanged as access will continue to avoid saltmarsh and sensitive habitats within the Hoverport. The Manston Airport outfall will not be modified or obstructed as a result of the proposed change. The review of marine assessments confirms no change to reported effects as the anticipated level of construction or operational activities remain as assessed within the ES (including subsequent chapter updates). Cumulative effects also remain as previously assessed.
- Ex1.2.3 No additional mitigation measures have been identified and existing commitments within the ES and DCO application remain applicable. No changes to Volume 7 documents are required as a result of this proposed change. **Application Document 9.76.5.3 Change Request Appendix C: Tree Constraints Plans Kent Onshore Scheme** submitted at Deadline 1A and **Application Document 9.76.5.4 Change Request Appendix D: Tree Protection Plans Kent Onshore Scheme** submitted at Deadline 1A have been updated to show the arboricultural data from the DCO application shown against the proposed change Order Limits. The only change to these is to note some potential pruning of a tree group (G599K) in the Hoverport area.

Ex1.3 Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk

- Ex1.3.1 ***Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk*** refers to the extension of lateral Limits of Deviation for Work 1B (i.e. substation)

to align with those in the Scottish Power Renewables (SPR) Consents. The maximum footprint and height of the substation remain unchanged.

- Ex1.3.2 No new or different likely significant effects have been identified as a result of Change 2. Landscape and visual impacts remain consistent with ES conclusions and this is confirmed by the updated visualisations (see **Application Document 9.76.5.5 Change Request Appendix E: Updated Visualisations for Change 2** submitted at Deadline 1A). An updated version of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request)** with a revised Figure 5: Friston Substation Outline Landscape Mitigation, is submitted with the Change Request to reflect the proposed change in Limits of Deviation.
- Ex1.3.3 The conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no new mitigation measures are required and the existing measures remain appropriate.

Ex1.4 Change 3: Change to the Order Limits South East of Friston to provide flexibility in the route of an underground cable and haul road, Suffolk

- Ex1.4.1 ***Change 3: Change to the Order Limits South East of Friston to provide flexibility in the route of an underground cable and haul road, Suffolk*** refers to the expansion of Order Limits to allow flexibility to either route around or excavate a heritage feature identified during archaeological evaluation. Initial investigations suggested the feature could be of potential national significance and schedulable quality; however, subsequent geophysical survey (see **Application Document 9.76.5.2 Appendix B: Geophysical Survey Report** submitted at Deadline 1A) has confirmed the feature is of regional importance and thus of non-schedulable quality. Mitigation options (avoidance and/or full excavation) have been discussed with Historic England and the Suffolk County Council Archaeological Advisor and will be detailed in the next iteration of **Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]**. The successful completion of the agreed mitigation will result in a minor adverse residual effect on heritage assets, which is not significant.
- Ex1.4.2 An updated extended Phase 1 Habitat Survey, badger survey and protected species scoping survey has been undertaken and is presented in **Application Document 9.76.5.6 Change Request Appendix F: Change 3 Phase 1 Habitat Survey Results** submitted at Deadline 1A. The updated survey did not identify any new receptors from those already considered in the submitted ES. Therefore, the overall ecological assessment within the ES remains unchanged, with no new or different likely significant effects and no further mitigation deemed necessary.
- Ex1.4.3 Additional tree surveys have been undertaken of new land within the Order Limits and the results are included in **Application Document 9.76.5.7 Change Request Appendix G: Tree Survey Schedule Extract Suffolk Onshore Scheme** submitted at Deadline 1A and also shown in **Application Document 9.76.5.8 Change Request Appendix H: Tree Constraints Plans Suffolk Onshore Scheme** submitted at Deadline 1A. The proposed change has resulted in the potential impact to, or loss of three low quality trees as shown in the updated Tree Protection Plan (Suffolk) included as **Application Document 9.76.5.9 Change Request Appendix I: Tree Protection Plans Suffolk Onshore Scheme** submitted at Deadline 1A. All moderate and high-quality tree features, including an identified veteran tree (outside the Order Limits), will

be fully retained and protected in accordance with the tree protection measures shown in Appendix I and a new commitment (A19) included within **Application Document (B) 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request)** submitted at Deadline 1A.

- Ex1.4.4 The conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no other new mitigation measures are required and the existing measures remain appropriate.

Ex1.5 Change 4: Benhall railway bridge, Suffolk

- Ex1.5.1 **Change 4: Benhall railway bridge, Suffolk** refers to the inclusion of land around Benhall railway bridge to enable either the installation of a temporary mini-bridge (Option 1) or minor works to strengthen the bridge (Option 2) for abnormal indivisible loads (AILs).
- Ex1.5.2 An updated extended Phase 1 Habitat Survey and protected species scoping survey was completed of the additional land to be included within the Order Limits and the results are reported in **Application Document 9.76.5.10 Change Request Appendix J: Change 4 Phase 1 Habitat Survey Results** submitted at Deadline 1A. There is potential for badgers and bats to be present within this area, however these are already identified as receptors in the ES chapter, and no further mitigation is considered necessary at this stage until further surveys have confirmed presence/likely absence of roosting bats and badgers and the precise details of the works to the bridge and any need for rail embankment access are confirmed.
- Ex1.5.3 With regards to traffic and transport, both proposed options would require temporary road closure(s) on the B1121 Main Road to accommodate the proposed works on Benhall railway bridge, which has the potential to introduce new environmental effects on the surrounding highway network due to the diversion of future baseline traffic onto other routes in combination with construction traffic.
- Ex1.5.4 An assessment has been undertaken to identify the forecast redistribution of future baseline traffic across the highway network when Benhall railway bridge is temporarily closed. The assessment has been carried out based on the same criteria adopted for the assessment of Driver Delay within the ES, which concludes that any effects would be minor and not significant, given that the duration of any impacts would be short-term. The assessment then considers the potential impact of the redistributed future baseline traffic in combination with peak construction traffic for the Proposed Project, which also concludes that any effects would not be significant. The assessment is supported by **Application Document 9.76.5.11 Change Request Appendix K: Traffic Flow Diagrams, Application Document 9.76.5.12 Change Request Appendix L Tabulated Traffic Flows and Application Document 9.76.5.13 Change Request Appendix M: Additional Assessment of Proposed Temporary Road Closure** submitted at Deadline 1A. Further details of the proposed change and how these works would be carried out and managed are set out within, and will be secured through, an updated version of **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A. This includes maintaining local vehicular access along the B1121 Main Road either side of the Benhall railway bridge closure and making a shuttle/ taxi service available to residents of Whitearch Park Residential Park Homes (who do not have access to a vehicle). These are secured via new mitigation measures TT11 and TT12 included in **Application Document (B) 7.5.3.2 CEMP Appendix B Register of**

Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A.

- Ex1.5.5 In addition, both options would require the northern end of PRow E-137/026/0 to be temporarily closed when road closure(s) are in place. **Application Document 6.4.2.7.4 Walking and Cycling Routes (including PRows and Bridleways) – Suffolk Onshore Scheme (Version 2, change request)** has been updated for Deadline 1A to include this PRow and is included in the Figures at the end of this Addendum. Additional mitigation, including keeping the remainder of the PRow open, installing signage to advise users of the closure/works and making a shuttle/taxi service available to residents of Whitearch Park Residential Park Homes (who do not have access to a vehicle), which is secured as part of measure TT11 within both the Outline Construction Traffic Management and Travel Plan and the REAC, means that there is no potential for significant adverse effects to arise.
- Ex1.5.6 Whilst temporary road closure on the B1121 has the potential to introduce new severance impacts between residents and community facilities, businesses and open spaces; local access for residents and businesses in Benhall will be maintained as set out in new commitment TT12 within **Application Document 7.5.3.2 (B) CEMP Appendix B: Register of Environmental Actions and Commitments (REAC) (Version 2, change request)** submitted at Deadline 1A. There are therefore no anticipated new or different likely significant effects as a result of the temporary road closure. No potential for significant adverse effects are expected to arise as a result of the temporary closure of Footpath 137/026/0 due to the limited duration of the closure and the availability of comparable alternative routes within the local vicinity.
- Ex1.5.7 Additional tree surveys have been undertaken of new land within the Order Limits and the results are included in **Application Document 9.76.5.7 Change Request Appendix G: Tree Survey Schedule Extract Suffolk Onshore Scheme, Application Document 9.76.5.8 Change Request Appendix H Tree Constraints Plans Suffolk Onshore Scheme and Application Document 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme** submitted at Deadline 1A.
- Ex1.5.8 Both options would involve cutting back and removal of low/moderate quality trees but overall, the additional tree loss required is considered minor and not significant.
- Ex1.5.9 The proposed change may also introduce short-term localised impacts on landscape and visual, noise and vibration, and air quality, but these would not introduce any new or different likely significant environmental effects to those reported within the ES.
- Ex1.5.10 The conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no other new mitigation measures are required and the existing measures remain appropriate.

Ex1.6 Change 5: Increase in area for maintenance of a new hedge south of B1119

- Ex1.6.1 ***Change 5: Increase in area for maintenance of a new hedge south of B1119*** refers to widening of Order Limits south of B1119 to allow maintenance of a new hedgerow. The proposed hedgerow and hedgerow tree planting in this location had been identified as essential mitigation within the ES to reduce effects on landscape character and visual amenity.

- Ex1.6.2 Figures 1 and 3 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A, have been updated to reflect the updated Order Limits.
- Ex1.6.3 The revised Order Limits include additional land from the Redhouse Christmas Tree Farm in Sternfield. Any Christmas trees planted within the revised Order Limits will be removed as necessary to facilitate these maintenance activities. Considering the limited extent of land required, together with the minor scale and infrequent nature of the maintenance works it is anticipated that the business would have sufficient capacity to absorb this impact without any likely significant adverse effect on its economic wellbeing.
- Ex1.6.4 The proposed change would result in the additional loss of part of two Christmas tree plantation groups (W737S and W738S) as shown on **Application Document 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme** submitted at Deadline 1A. The permanent loss of a small area of these low stature plantation groups will not result in a substantive arboricultural impact. The proposed hedgerow will incur within the existing established woodland group (W708S). Hedge planting will be carried out by hand and new hedgerow plants will be sited to avoid important tree roots. This is secured through new measure A20 in the updated **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request)** submitted at Deadline 1A.
- Ex1.6.5 The conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no other new mitigation measures are required and the existing measures remain appropriate.

1. Introduction

- 1.1.1 National Grid Electricity Transmission plc (hereafter referred to as ‘National Grid’) submitted an application for a Development Consent Order (DCO) to the Planning Inspectorate under the Planning Act 2008 for the Sea Link Project (hereafter referred to as the ‘Proposed Project’) on 27 March 2025. The application was accepted for Examination on 23 April 2025.
- 1.1.2 The Proposed Project involves the reinforcement of the electricity transmission system in the South East of England and East Anglia. The Proposed Project is comprised of the following elements:
- The Suffolk Onshore Scheme;
 - The Kent Onshore Scheme; and
 - The Offshore Scheme.
- 1.1.3 The DCO application was accompanied by an Environmental Statement (ES), which was split into the following volumes and parts:
- Non-Technical Summary (NTS);
 - Volume 6 Part 1 – Introduction;
 - Volume 6 Part 2 – Suffolk Onshore Scheme;
 - Volume 6 Part 3 – Kent Onshore Scheme;
 - Volume 6 Part 4 – Offshore Scheme;
 - Volume 6 Part 5 – Project Wide Effects;
 - Volume 6 Appendices (6.3); and
 - Volume 6 Figures (6.4).
- 1.1.4 The application was also accompanied by a number of other environmental assessments and reports within Volume 6, namely:
- **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289];**
 - **Application Document 6.6 (C) Habitats Regulations Assessment Report [REP1-071];**
 - **Application Document 6.7 Statement of Statutory Nuisance [APP-291];**
 - **Application Document 6.8 Flood Risk Assessment [APP-292];**
 - **Application Document 6.9 Water Framework Directive Assessment [APP-293];**
 - **Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295];**
 - **Application Document 6.11 (B) Marine Conservation Zone Assessment [REP1-021];**

- **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report** submitted at Deadline 1A; and
- **Application Document 6.13 Marine Plan Policy Assessment [APP-298].**

- 1.1.5 Volume 7 of the DCO application contained other relevant documents referenced within the ES, including a set of outline management plans and other control documents such as **Application Document 7.5.2 Outline Offshore Construction Environment Management Plan [APP-339]**, **Application Document 7.5.3 (B) Outline Onshore Construction Environment Management Plan [AS-127]**, **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]**.
- 1.1.6 National Grid submitted a notification of the intention to make proposed changes to the DCO application on 16 September 2025 (**Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]**), with five proposed changes to the design across the Proposed Project.
- 1.1.7 On 26 November 2025, National Grid submitted a formal Change Request seeking the Examining Authority's (ExA's) consent to include the proposed changes to the DCO application currently being examined. This **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement** submitted at Deadline 1A forms part of the Change Request. The document reviews the proposed changes to the Proposed Project and considers whether they would result in new or different likely significant environmental effects compared to those reported within the ES. It also considers whether the conclusions of other relevant Volume 6 assessments, as listed in paragraph 1.1.4, would change as a result of the proposed changes to the Proposed Project and whether any of the control documents included in Volume 7 are required to be updated.

2. Description of Proposed Changes

2.1 Introduction

2.1.1 The proposed changes comprise the following:

- Change 1: Change to access at the Hoverport, Kent
- Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk
- Change 3: Change to the Order Limits South East of Friston to provide flexibility in the route of an underground cable and haul road, Suffolk
- Change 4: Benhall railway bridge, Suffolk
- Change 5: Increase in area for maintenance of a new hedge south of B1119

2.1.2 These proposed changes are shown on Figure 1 to Figure 5 at the end of this Addendum and are further described in the following sections.

2.1.3 Further details of each of the proposed changes are provided in **Application Document 9.76.2 Change Request Report** submitted at Deadline 1A. This document sets out the reasons and need for making each of the proposed changes and explains whether the proposals are in any way different to those presented in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]**.

2.1.4 National Grid has carried out proportionate consultation on the proposed changes during October and November 2025. **Application Document 9.76.3 Change Request Consultation Report** submitted at Deadline 1A provides further detail on this consultation and how National Grid has had regard to feedback received.

2.2 Change 1: Change to access at the Hoverport, Kent

2.2.1 It is proposed that the Order Limits at the Hoverport at Pegwell Bay in Kent are extended to widen the access to the intertidal area from the Hoverport to ensure that encroaching saltmarsh habitat in the vicinity of the Hoverport can be avoided.

2.2.2 During a site walkover in August 2025, the extent of saltmarsh was recorded further down shore than had previously been recorded and it is now encroaching on the current Order Limits and the western ramp access for construction, operations and maintenance activities from the Hoverport. Saltmarsh is a sensitive habitat, and National Grid has committed to the avoidance of impacts to this habitat in Pegwell Bay through the use of trenchless techniques at the landfall. By amending the Order Limits to include the whole front of the Hoverport and eastern ramp, this will provide the flexibility for the access route to the intertidal area to avoid the encroaching saltmarsh habitat and any further expansion of this habitat. Further detail on the anticipated expansion of the saltmarsh habitat is presented in **Application Document 9.76.5.1 Appendix A: Saltmarsh Technical Note** submitted at Deadline 1A.

2.2.3 The additional area introduced into the extended Order Limits is predominantly formed of concrete and is located further away from the sensitive saltmarsh habitat.

- 2.2.4 The amended Order Limits include Manston Airport outfall. No works to the outfall are proposed as part of the proposed change and National Grid confirms that Manston Airport service pipe was already included in the Order Limits proposed in the DCO application.
- 2.2.5 The proposed change to the Order Limits is shown on Figure 1.

2.3 Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk

- 2.3.1 This change relates to the construction of Friston (Kiln Lane) Substation (Work 1B), which will occur under the Sea Link application under scenario 2 as described in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**.
- 2.3.2 The change extends the limits of deviation for Work 1B (Friston (Kiln Lane) substation), as set out in Schedule 1 of the DCO application **[REP1-036]**, to align with the work area for Friston (Kiln Lane) substation as presented in the Works Plans for the two Scottish Power Renewables (SPR) projects; namely East Anglia ONE North Offshore Wind Farm Order 2022 and the East Anglia TWO Offshore Wind Farm Order 2022 (thereafter referred to as 'SPR Consents').
- 2.3.3 This change is proposed in response to concerns raised by the ExA and Interested Parties on consistency between plans being developed to discharge requirements on the SPR consents and outline plans included in the Sea Link application at Friston. The change will make it easier for consistent plans to be developed.
- 2.3.4 The proposed approach is to alter the limits of deviation for Work 1B (and Work 4 as relevant) to be consistent with the area in the SPR Consents. This change does not require any change to the Proposed Project's Order Limits or the Land Plans. All land within the revised area would be required for the Proposed Project as a whole and the size of the substation would remain as previously proposed, just with more flexibility over its location.
- 2.3.5 Therefore, the area of the footprint of the proposed Friston (Kiln Lane) Substation remains the same (i.e. 16,800 m²) as presented in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**. The updated lateral Limits of Deviation are illustrated on the updated **Drawing Reference DCO/K/WK/PS/0402 in Application Document 2.5 (B) (Version 2, change request) Works Plans** submitted at Deadline 1A.
- 2.3.6 Similarly, no change to the height of the proposed Friston (Kiln Lane) Substation, as assessed within the ES (i.e. 18 m), is proposed as part of this change. It should be noted, however, that the updated version of the draft DCO submitted at Deadline 1 **[REP1-036]** confirmed the maximum height of the proposed Friston (Kiln Lane) Substation would be 16 m to align with the maximum height in the SPR Consents. Therefore, the original EIA and this assessment have considered a worst case scenario and in reality the substation will be smaller than as assessed.
- 2.3.7 The proposed change is shown on Figure 2.

2.4 Change 3: Change to the Order Limits South East of Friston to provide flexibility in the route of an underground cable and haul road, Suffolk

- 2.4.1 The results of the Phase 2b evaluation trenching in Suffolk (see **Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]**) identified a possible henge feature near Friston, which was considered by Historic England (HE) and Suffolk County Council Archaeological Advisor (SCCAA) to be of national significance and of schedulable quality, subject to further investigation. As such, HE and SCCAA initial advice was that mitigation through design would be deemed the most appropriate approach, with the asset avoided.
- 2.4.2 It was initially proposed in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** to amend the Order Limits to remove the potential Neolithic hengiform feature from the Order Limits and to introduce additional land to enable the underground High Voltage Direct Current (HVDC) cable to be routed around the feature. However, further geophysical survey of the area around the potential hengiform feature completed in October 2025 indicates that the asset is a D-shaped enclosure rather than a henge. The results of the further geophysical survey are included in **Application Document 9.76.5.2 Appendix B: Geophysical Survey Report** submitted at Deadline 1A.
- 2.4.3 The geophysical survey also identified potential archaeological features of interest in the area to the west of the heritage feature and no potential archaeological features in the area to the east of the heritage feature, where the Order Limits were proposed to be extended as set out in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]**.
- 2.4.4 Engagement with HE and the SCCAA in October 2025 concluded that the heritage feature present is not of potential national significance or of schedulable quality, but rather of regional significance. National Grid is still proposing to undertake additional evaluation trenching in the area within the amended Order Limits to better understand the enclosure and the surrounding archaeology.
- 2.4.5 For the Change Request, National Grid proposes to retain the option of being able to install the cable route and haul road as set out in the submitted DCO application with an expansion to the Order Limits around the heritage feature in order to allow full excavation of the heritage feature (if required). The Order Limits are also extended to the east to provide the flexibility to respond to the results of the additional evaluation trenching which is due to be completed, should avoidance of the heritage feature be the preferred option following the analysis of the results. The area to the west of the heritage feature, which was included in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** is no longer included in the Change Request. This is due to the potential archaeological features that had been identified in this area during the additional geophysical survey. This approach is supported by HE and the SCCAA.
- 2.4.6 The proposed change is shown in Figure 3.

2.5 Change 4: Benhall railway bridge, Suffolk

- 2.5.1 This change proposes to introduce land into the Order Limits along the B1121, including Benhall Railway Bridge over the railway and associated land along the highway to the east and west of the bridge between the A12 and Grays Lane/ Forge Close. The proposed change also includes a small stretch along the railway line. The additional land to the east of the B1121 that was identified in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** has subsequently been removed from the Change Request.
- 2.5.2 This change has been introduced because planning permission has been granted for housing on the site since submission of the Notification Letter. As a result of discussions with the landowner, consultation responses received and further review of the technical options, the team agreed that there are two solutions that are deliverable without the additional land and therefore the additional area should be removed. The proposed option of installing a semi-permanent bridge has also been discounted from the Change Request as adjacent land was required to deliver this option.
- 2.5.3 The main access to the proposed new converter station in Suffolk crosses the bridge on the B1121 known as Benhall Railway Bridge. Suffolk County Council's (SCC's) Relevant Representation dated 29 May 2025 states that
- "The structural condition of the bridge means that it has been restricted to STGO [Special Types General Order] (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads ("AILs") due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12. Additionally, Benhall Railway Bridge is not currently included within the Draft Order Limits for the Sea Link proposals".*
- 2.5.4 This weight limit on Benhall Railway Bridge would not be an impediment to the majority of construction traffic accessing the converter station as loads would not exceed the weight limit. However, it could be a factor in planning the movements of the Abnormal Indivisible Load (AIL) vehicles associated with the transport of seven transformers, a piling rig and a mobile crane. The final detail of AIL routing and solutions for movements is typically developed after a DCO is made when the loads and programme for movements is known. This is partially because the loads and programme for delivery will be known in detail only when a contractor is on board; and partially because the condition of the public highway is constantly changing so there is potential for change between the Application and construction (for better or worse). However, National Grid agreed to look at the solution for Benhall Railway Bridge as part of the Change Request to provide reassurance to SCC and East Suffolk Council (ESC) that the proposed solutions were feasible and acceptable.
- 2.5.5 National Grid's solution as considered at the DCO application stage was to install a 'mini-bridge' overbridge structure within the highway boundary that would avoid weight being placed on the bridge abutments to the restricted limits; with the mini-bridge anticipated to be installed on approximately 15 occasions over the 4-year construction period. This solution can be achieved without the area of highway required being included in the Order Limits due to the powers already in the Order and consents to be obtained outside the DCO. However, SCC and ESC have expressed concern about this area being excluded from the Order Limits, and questioned whether the consenting mechanism for those works were clear. To respond to this request, National Grid

proposed to add the areas of highway required for this solution into the Order Limits for the Proposed Project.

2.5.6 Two options are proposed for enabling vehicles over the weight limit to cross the bridge:

- Option 1: Installation of the 'mini-bridge' within the highways boundary only (this would require 15 temporary road closures of the B1121 for three day periods; it would also result in similar temporary closures of the northern end of Public Right of Way (PRoW) E-137/026/0 at the location where this PRoW currently joins the south-eastern footway on Benhall Bridge); or
- Option 2: Minor works to fix the bridge (this would require a worst-case temporary road closure of the B1121 for 28 days; it would also result in a similar temporary closure of the northern end of PRoW E-137/026/0 at the location where this PRoW currently joins the south-eastern footway on Benhall Bridge).

2.5.7 Option 1 can be completed entirely within the highway. Option 2 would involve intrusive investigation work to clarify the condition of the bridge and any issues experienced. An initial investigation undertaken by SCC was not intrusive and did not provide certainty on the bridge condition so further study would be required to define any remedial works that could be undertaken to bring the bridge back up to standard. Should those remedial works be of a scale and programme that was reasonable for National Grid to implement, National Grid had agreed to consider implementing Option 2. Option 2 could deliver additional benefits by permanently improving the highway as well as removing the need for road closures to install overbridges both for the Proposed Project and any future projects such as LionLink. It would provide a permanent solution to the issue rather than the temporary solution offered by Option 1. National Grid recognises the additional benefits offered by Option 2 as discussed with SCC in a meeting in August 2025.

2.5.8 Option 2 would require access to the bridge for investigation and improvement works. This access would include access to the underside of the bridge, so it would also require access to a short section of the railway. National Grid regularly obtains consents and permissions to carry out works on Network Rail land for normal operational and construction purposes and is seeking to engage with Network Rail to agree consents to carry out investigative works and confirm the feasibility of Option 2.

2.5.9 The proposed change to the Order Limits would provide the flexibility to implement both of these options currently under consideration; enabling joint working with SCC to explore the best option.

2.5.10 The proposed change is shown on Figure 4.

2.6 Change 5: Increase in area for maintenance of a new hedge south of B1119

2.6.1 This change proposes to broaden the strip of land south of the B1119 in Suffolk to accommodate a new hedge alongside the existing drainage. This proposed change is in response to landowner feedback around the maintenance approach to the drain and to provide flexibility in how the future planting will be maintained.

2.6.2 The new hedge in this location is included in the ES and is essential mitigation. It is presented as mitigation in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A. The hedgerow is predominantly proposed for landscape and visual purposes, although it also would have benefits in providing ecological connectivity.

- 2.6.3 The area of the Order Limits along the B1119 is very narrow near Fristonmoor Lane, which was deliberately kept as such to minimise the impact on the adjacent fields. A concrete drain lies adjacent and parallel to the road, which is believed to be constructed predominantly to drain the highway, although it has not yet been possible to confirm. One of the landowners of a field to the south of the road has made National Grid aware that this drain is currently maintained by the landowner from his field to the south, rather than the highway authority from the road, and that it is also connected to field drains.
- 2.6.4 Whilst the strip of land along the B1119 in the Order Limits is sufficient for the existing drainage and adjacent proposed planting, it is not sufficient to also include a maintenance strip between the two. The landowner has highlighted to National Grid that this would be problematic as the landowner would be unable to maintain the ditch using current equipment. The landowner raised concerns about the impact this could have on flooding along the road and in the field; and the health and safety implications of instead maintaining the drain from the road.
- 2.6.5 The proposed change would amend the Order Limits to the south of the road to provide sufficient space between the new planting and the drain to enable maintenance of both; and a strip to the south of the planting to enable National Grid to maintain the planting if the landowners would not like to. This additional space also enables the planting to be located further from the existing Northumbrian Water Group (NWG) water main (operating in the locality as Essex and Suffolk Water); although it is anticipated that hedgerow planting will be acceptable above the main as it is now.
- 2.6.6 The proposed change is shown on Figure 5.

3. Review of the Environmental Assessments

- 3.1.1 A review of whether the proposed changes as comprised in the Change Request are likely to result in new or different likely significant environmental effects, compared to those reported within the ES, has been undertaken across all technical assessments. The review has also looked at whether the conclusions set out in other relevant Volume 6 assessments, as listed in Section 1 above, would change as a result of the proposed changes. The results of this review are set out in Table 3.1 to Table 3.8 and Table 3.11 to Table 3.12 which go through each proposed change in turn.
- 3.1.2 Factors which have been considered when undertaking the review of proposed changes for each technical topic reported within the ES include:
- Whether the proposed change increases or decreases the Order Limits;
 - Whether the proposed change results in any amendments to the key components of the Proposed Project e.g. location of permanent infrastructure;
 - Whether the proposed change introduces any new receptors which should be considered within the assessment or alters likely impacts on existing receptors;
 - Whether the proposed change could alter the proposed construction phase works or programme;
 - Whether the proposed change could alter the proposed operation of the Proposed Project; and
 - Whether the proposed change could alter the proposed decommissioning of the Proposed Project.
- 3.1.3 There have been no changes to the regulatory and planning policy context since the DCO application was submitted in March 2025. Consultation on proposed revisions to National Policy Statements (NPS) for energy infrastructure EN-1, EN-3 and EN-5 took place between April and May 2025. Updates to these NPSs are expected to come into force at the end of 2025. The DCO application was accepted for examination before these NPSs are amended, therefore the Proposed Project will still be subject to examination pursuant to the 2024 versions as reported in the ES and **Application Document 7.1 (B) Planning Statement (Clean) [AS-030]**.
- 3.1.4 The proposed changes do not alter the content of the information relating to the development of the Proposed Project design and the main alternatives considered as set out within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. The proposed changes present a further iteration of the Proposed Project following further technical and survey work and ongoing engagement with stakeholders.
- 3.1.5 The proposed changes are also not considered to alter the scope of the EIA undertaken as set out in the **Application Document 6.3.1.6.A EIA Scoping Opinion [APP-094]** and **Application Document 6.2.1.6 Part 1 Introduction Chapter 6 Scoping Opinion and EIA [APP-047]**. Details of how National Grid has responded to feedback on the

current Change Request is provided within **Application Document 9.76.3: Change Request Consultation Report** submitted at Deadline 1A.

3.2 Change 1: Change to access at the Hoverport, Kent

- 3.2.1 Table 3.1 provides a review of whether Change 1 would result in any new or different likely significant environmental effects compared to those reported within the ES previously submitted, including updates to chapters following submission of the DCO application.

Table 3.1 Review of ES conclusions as a result of Change 1

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-061	6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual	The proposed change to the Order Limits widens the potential area of access from the Hoverport to the intertidal area within Local Character Area F1 Pegwell Bay, thereby ensuring that the encroaching saltmarsh can be avoided. This proposed change would not result in any likely new or different significant effects on landscape character or visual amenity to those reported within the ES chapter and further mitigation measures are therefore not necessary. This is due to the potential area of access falling within the same part of the Local Character Area F1 and in the same part of views from visual receptors.
REP1-049	6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity	<p>An updated version of Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049] was submitted at Deadline 1 which includes an assessment of the proposed construction access through the Hoverport. That update is not a result of Change 1, but this review of whether there are new or different likely significant effects as a result of the proposed change is considered against the conclusions of this latest version of the chapter.</p> <p>The terrestrial area of the Hoverport is a mixture of scrub and an open mosaic habitat on hardstanding. The proposed change to the Order Limits widens the area available for access from the Hoverport to the intertidal area, thus ensuring that the saltmarsh habitats can be avoided, which is an inherent assumption of the ES chapter (see measure B67 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]). The new area of Hoverport added to the Order Limits is mainly concrete. The widening of the access area also allows greater flexibility to avoid open mosaic habitats within the Hoverport compared to the previous design (see measure B66 within REAC [REP1-102]). As such, there would be no new adverse effects on the terrestrial habitats as a result of Change 1 as the access route taken through the Hoverport will be able to keep to hardstanding and avoid any vegetation and tree clearance, although some limited branch pruning of shrubs adjacent to the hardstanding route may be required, depending on extent of further growth prior to construction. Therefore, the assessment and conclusions within the latest ES chapter [REP1-049] remain unchanged and further mitigation measures are not considered necessary.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-063	6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage	There are no designated heritage receptors or known non-designated heritage receptors in the area of the proposed change. The proposed change would not result in any new or different likely significant effects on heritage assets to those reported in the ES chapter. The heritage assessment in the submitted ES chapter remains unchanged, and further mitigation measures are not necessary.
APP-064	6.2.3.4 Part 3 Kent Chapter 4 Water Environment	<p>The proposed change would help to further reduce potential impact on a hydrologically sensitive saltmarsh habitat. The Manston Airport outfall will not be modified or obstructed as a result of the proposed change, and there would therefore be no related impacts on Pegwell Bay as a receptor, to which the outfall discharges. When compared to the design presented within the ES, there would be no new or different likely significant effects on the water environment as a result of the proposed change.</p> <p>Therefore, the overall assessment and conclusions within the ES chapter remain unchanged, and no further mitigation is considered necessary.</p>
APP-065	6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology	The proposed change is to the extent of the Order Limits, with only access still being proposed in this location and no intrusive activities. Given the nature of the proposed change, there would be no new or different likely significant environmental effects on geology and hydrogeology as a result of the proposed change when compared to those reported within the ES.
PDA-023	6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils	The land within the widened Order Limits is not classified as under agricultural use, and as such does not change the impact on agricultural land take or soil receptors. Therefore, it is considered that there are no new or different likely significant effects on agriculture and soils as a result of the proposed change.
APP-067	6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport	The proposed change to the Order Limits near the foreshore are not expected to result in any changes with respect to traffic and transport, as this location will continue to be accessed via the same access arrangements on Sandwich Road and there are no PRoW within the immediate area of the proposed change. The proposed change does not alter the way that any PRoW, including PRoW TR15 and TR33, are to be crossed and managed on Pegwell Road on the approach to the Hoverport and so there is no change to the assessed impact on these PRoW. Therefore, this does not introduce any changes to the assessment and there are no new or different likely significant effects with regards to traffic and transport.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-068	6.2.3.8 Part 3 Kent Chapter 8 Air Quality	The proposed change does not impact the outcome of the construction or operational vehicle emissions assessment as vehicle flows for both the construction and operational phases remain the same. The unmitigated risk of construction dust effects remains the same and is considered to be not significant with the implementation of mitigation measures set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] . Therefore, the overall assessment within the ES remains unchanged, and no further mitigation is considered to be necessary.
AS-111	6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration.	The distance to nearby noise sensitive receptors is sufficiently large at this location that likely significant adverse effects are not expected during construction. The proposed change does not introduce any changes to the assessment presented in this ES chapter and as such there are no new or different likely significant effects with regards to noise and vibration, and no further mitigation is considered to be necessary.
Updated chapter submitted at Deadline 1A – Application Document Number is to be confirmed	6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism	Pegwell Bay Country Park borders the landfall section of the Kent Onshore Scheme to the south, however the proposed changes to the Order Limits and internal access road near the foreshore would not result in any changes with respect to socio-economics, recreation and tourism. Pegwell Bay Country Park is identified as an open space receptor with potential to be impacted within the ES chapter. This receptor was therefore assessed and it was concluded that the Proposed Project would not give rise to significant adverse effects from a socio-economics, recreation and tourism perspective. As reported above for traffic and transport, the proposed change does not alter the way that any PRoW, including PRoW TR15 and TR33, are to be crossed and managed on Pegwell Road on the approach to the Hoverport and so there is no change to the assessed impact on these PRoW. Pedestrian access through the Hoverport, where it interacts with the access route for the Proposed Project once this is in use, will be appropriately managed to ensure safe continued access through the works area, with barriers and crossing points implemented as required. Given the limited and localised nature of the proposed changes to the Order Limits and because the proposed change does not alter the nature and frequency of the access required through the Hoverport, the assessment findings remain the same, and there would be no new or different likely significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
AS-003	6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing.	Given the nature of the proposed change it does not introduce any changes to the assessments of landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. As such, there are no new or different significant effects with regards health and wellbeing. There is no change to the conclusions of this ES chapter, and no further mitigation is considered necessary.
APP-072	6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects	Given there is no change in the conclusions presented in each of the topics above, and there would be no change to the sources of intra-project effects, the proposed change does not alter the conclusions in terms of likely significant intra-project effects reported in this ES chapter.
APP-073	6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects	The proposed change does not alter the Proposed Project's interaction with other developments in Pegwell Bay, therefore the proposed change does not alter the conclusions in terms of significant inter-project effects reported in this ES chapter.
REP1-051	6.2.4.1(C) Part 4 Marine Chapter 1 Physical Environment (Clean)	The proposed change widens the Order Limits at the Hoverport in Pegwell Bay to maintain access to the intertidal zone. There is no change to the number of construction and operational movements being proposed across the intertidal zone as a result of this proposed change. Construction access over the mudflats is required on a limited number of occasions only and mudflat sediments will also be exposed during access periods and will not therefore be transported by tidal currents. No update is required to the assessment and there are no new or different likely significant effects as a result of this proposed change.
REP1-053	6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport in order to provide flexibility to enable the access route to avoid the encroaching saltmarsh habitat. No new benthic receptors or habitats of conservation importance would be affected as a result of this proposed change, and as such, there are no new or different likely significant effects to consider. The overall assessment within the ES remains unchanged and no additional mitigation is required.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
AS-022	6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. Access over the Hoverport and the limited intertidal movements remain the same with this proposed change and so will not affect water quality, sediment chemistry, or habitat availability for fish or shellfish. The Manston Airport outfall will not be modified or obstructed as a result of the proposed change. No additional works are proposed below Mean High Water Spring (MHWS), and there is no potential for direct or indirect effects on spawning or nursery habitats as a result of the proposed change. The conclusions of the original assessment remain the same, with no further updates required.
REP1-055	6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. Use of the mudflats for construction access to trenchless crossing (HDD) exit pits and during marine cable pull in and cable burial, and during operation and maintenance has already been considered in the assessment presented in this ES chapter. This assessment has been informed by updated noise modelling presented in Application Document 9.49 Seals and Airborne Noise Modelling [REP1-122] . The assessment concludes that potential effects of construction traffic using the mudflats on seals will be negligible. There will be no changes to the type, number or frequency of construction traffic movements associated with the proposed change to the Order Limits. It can therefore be concluded that the conclusions from the original assessment remain the same with no further updates required.
AS-115	6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology	Use of the mudflats for construction access to trenchless crossing (HDD) exit pits and during marine cable pull in and cable burial, and during operation and maintenance has already been considered in the assessment presented in this ES chapter. Further detail on the types and number of vehicles that will be using the construction access, and associated vehicle movements will be provided in Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology for submission at Deadline 2, along with updated noise modelling. These updates will be based on information presented in Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP1-108] (submitted at Deadline 1) which was prepared to provide further clarity on the proposed works and construction activities occurring within Pegwell Bay.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		Although the revised Order Limits include a wider area of the Hoverport frontage, which is adjacent to foraging and roosting areas used by golden plover and other waterbirds, there will be no changes to the type, number or frequency of construction traffic movements associated with this change. It is therefore concluded that the proposed change to the Order Limits would not result in any changes to the baseline or potential impacts to ornithology receptors from those already assessed within the ES. There are therefore no new or different likely significant effects as a result of the proposed change.
REP1-057	6.2.4.6 (B) Part 4 Marine Chapter 6 Marine Archaeology	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. The Hoverport is located above MHWS and consists of previously developed land. Potential effects on archaeological features in the intertidal zone mudflats have already been assessed in this ES chapter. No new or different likely significant archaeological effects are predicted, and the overall assessment conclusions remain unchanged.
REP1-059	6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. The Hoverport area is above MHWS. Vessel movements or marine access arrangements within the intertidal area are unaffected, and no new or different navigation risks arise. The ES conclusions remain the same in terms of the assessment of effects with no further updates required. There are also no updates required to Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063] .
APP-081	6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. The Hoverport and adjacent intertidal zone are not used for commercial fishing. The extended Order Limits do not affect access routes or fishing grounds. There are no new or different significant effects on commercial fisheries. The conclusions in terms of the assessment of effects remain as presented in the ES chapter.
REP1-061	6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users	The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport, including areas identified as being used informally for walking and recreation. However, the frequency and nature of the access

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		<p>movements through the Hoverport is not changing as a result of this proposed change. Pedestrian access through the Hoverport, where it would interact with the access route for the Proposed Project once this is in use, will be appropriately managed to ensure safe continued access through the works area, with barriers and crossing points implemented as required. This will ensure minimal disruption and no permanent loss of access or recreational value is expected. There is no change to the conclusions reported in the ES chapter, with no new or different likely significant effects.</p>
APP-083	6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects	The change does not introduce additional construction activities beyond those already assessed in the ES. Potential cumulative interactions between benthic disturbance, ornithological disturbance, and intertidal access remain minor and localised. Consequently, there are no new or different significant intra-project cumulative effects as a result of the proposed change.
APP-084	6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects	The proposed change does not alter the Proposed Project's interaction with other marine or coastal developments in Pegwell Bay. The scale, duration, and nature of works remain consistent with previous assessments. Consequently, there are no new or different inter-project cumulative effects as a result of the proposed change.
APP-085	6.2.5.1 Part 5 Combined Chapter 1 Climate Change	This change to the access route across the Hoverport is being proposed so that the Proposed Project can continue to avoid vegetation loss by enabling the bypassing of the saltmarsh habitat. It also provides more flexibility for making use of existing hardstanding concrete surfaces within the Hoverport area to access the foreshore. Given this and the minor nature of the change from a climate change perspective, the overall assessment within the ES remains unchanged, and no further mitigation is considered necessary. There would be no new or different likely significant effects as a result of the proposed change.
APP-086	6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project	Given there is no change in the conclusions presented in each of the topics in Table 3.1, Table 3.3, Table 3.5, Table 3.7 and Table 3.11 it is considered that, when combined, the proposed changes would not result in any new or different likely significant Project-wide (combined) effects reported in this ES chapter.

3.2.2 Table 3.2 provides a review of whether Change 1 would change the findings reported in other environmental assessments included within Volume 6 of the DCO application.

Table 3.2 Review of other Volume 6 assessment conclusions as a result of Change 1

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-289	6.5 Electric and Magnetic Field Compliance Report	Given the nature of Change 1, the conclusions of this report do not change.
REP1-071	6.6 (C) Habitats Regulations Assessment Report	No change is required to the HRA or its conclusions as a result of Change 1. The proposed change does not introduce construction access to the intertidal zone through the former Hoverport (with associated need to consider impacts on golden plover) as that was already part of the DCO application and therefore it had already been assessed within the HRA. There will also be no changes to the type, number or frequency of construction traffic movements assumed within the DCO application. The proposed change increases the options available for accessing the intertidal zone while avoiding saltmarsh. Avoidance of impacts on saltmarsh is a core assumption of the HRA (for example, in paragraph 4.3.4) such that the proposed change ensures compliance with those assumptions. As requested by the Examining Authority, Change 1 was discussed with Natural England on 30 October 2025. In their response to the targeted consultation on the Change Request dated 3 November 2025, Natural England indicated they are content with the proposed change as it is intended to avoid impacts to saltmarsh habitats and it is in line with the comments in their relevant representation.
APP-291	6.7 Statement of Statutory Nuisance	As this report draws on information about impacts from the ES, and there are no new or different significant environmental effects reported in the ES as a result of this proposed change (see Table 3.1), it is concluded that there are no changes to the conclusions to the Statement of Statutory Nuisance.
APP-292	6.8 Flood Risk Assessment	The flood risk to the land within the proposed new Order Limits from all sources remains the same as that reported in Application Document 6.8 Flood Risk Assessment [APP-292] . Whilst the Manston Airport outfall would be included within the revised Order Limits, the outfall would not be modified or obstructed in any way, with consequently no change to the associated

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
		<p>drainage regime. There is a sea wall at the edge of the hover pad, which is understood to be in poor condition. When undertaking any Proposed Project activities, in accordance with Commitment W12 within the Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] defences would be monitored to ensure no detriment to their integrity. Therefore, there would be no new or different effects with regards to flood risk as a result of the proposed change, and no further mitigation is considered necessary.</p>
APP-293	6.9 Water Framework Directive Assessment	<p>The proposed change is located within the existing Zone of Interest for the Water Framework Directive (WFD) Assessment. Therefore, it does not interact with any new surface, transitional or coastal WFD waterbodies that are not already screened in to the assessment reported in Application Document 6.9 Water Framework Directive Assessment [APP-293]. Other than an extended Order Limits, there are no changes to the proposed activities compared to the existing application. Therefore, there would be no new or different effects with regards to the impact on WFD waterbodies as a result of the proposed change.</p>
APP-294 and APP-295	6.10 Arboricultural Impact Assessment Part 1 of 2; 6.10 Arboricultural Impact Assessment Part 2 of 2	<p>The proposed change does not present any changes to tree related impacts from the Proposed Project and therefore, the results of the Arboricultural Impact Assessment remain unchanged. See Application Document 9.76.5.3 Change Request Appendix C: Tree Constraints Plans Kent Onshore Scheme submitted at Deadline 1A and Application Document 9.76.5.4 Change Request Appendix D: Tree Protection Plans Kent Onshore Scheme submitted at Deadline 1A for the arboricultural data from the DCO application shown against the proposed change Order Limits. These are an update to Appendix B and F respectively from Application Document 6.10 Arboricultural Impact Assessment [APP-294 to APP-295]. The extended Order Limits provides more flexibility for making use of existing hardstanding concrete surfaces within the Hoverport area to access the foreshore and it has been confirmed by National Grid that no tree removal will be required to facilitate the access, although some limited branch pruning of shrubs adjacent to the hardstanding route may be required, depending on extent of further growth prior to construction.</p>
REP1-021	6.11 (B) Marine Conservation Zone Assessment	<p>The proposed change is not located within a Marine Conservation Zone (MCZ) and therefore there is no potential for new or different significant effects as a result of the proposed change. No updates to the MCZ Assessment are required.</p>

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.12 (C) Biodiversity Net Gain Feasibility Report.	Given the nature of the proposed change it is expected that it will result in a minor change to the BNG metric calculation as presented in the BNG Feasibility Report. The expansion of the Order Limits is a small change in the overall context of the Proposed Project's Order Limits and it is considered that this will not result in a significant change to the number of units required to achieve a 10% net gain. All changes will be captured in the detailed design BNG assessment.
APP-298	6.13 Marine Plan Policy Assessment	This amendment remains consistent with relevant marine plan policies, including the protection of sensitive habitats (BIO1/BIO2) and maintaining access to the coast (SOC1/SOC2). There would be no new or different significant effects as a result of the proposed change. No updates to the Marine Plan Policy Assessment are required.

3.3 Change 2: Change to the limits of deviation for Friston (Kiln Lane) substation, Suffolk

3.3.1 Table 3.3 provides a review of whether Change 2 would result in any new or different likely significant environmental effects compared to those reported within the ES previously submitted, including updates to chapters following submission of the DCO application.

Table 3.3 Review of ES conclusions as a result of Change 2

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-048	6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual	<p>The proposed change relates to extending the Limits of Deviation for Work 1B (Friston (Kiln Lane) substation), for the scenario where the substation is built as part of the Proposed Project (referred to as Friston Scenario 2 in the ES chapter). This is in order to align with the two SPR Consents. Whilst the proposed change results in extended lateral Limits of Deviation, the proposed footprint area of the substation remains the same. Whilst the vertical Limits of Deviation would also remain unchanged from those assessed within the ES, as explained within Application Document 9.76.2 Change Request Report submitted at Deadline 1A, the updated version of the DCO submitted at Deadline 1 [REP1-036] confirmed the maximum height of Friston (Kiln Lane) substation would be 16 m, therefore the EIA (including this assessment of proposed changes) has considered a worst case scenario. To illustrate this proposed change, all of the DCO application visualisations from representative viewpoints which show ‘Friston Scenario 2’ have been updated to reflect the extended lateral Limits of Deviation. These are shown in Application Document 9.76.5.5 Change Request Appendix E: Updated Visualisations for Change 2 submitted at Deadline 1A and include the following viewpoints; 1, 6a, 7, 8a, 9, 14 to 18 inclusive, 22 and 23. These are updated versions of the visualisations included within Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual [APP-208 to APP-214]. Given the minor nature of the proposed change and as illustrated by the updated visualisations in Application Document 9.76.5.5 Change Request Appendix E: Updated Visualisations for Change 2 submitted at Deadline 1A, there would be no new or different likely significant effects on landscape character or visual amenity to those reported in the ES chapter.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		<p>In addition, Figure 5: Friston Substation Outline Landscape Mitigation contained in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] has been updated to reflect the proposed change in Limits of Deviation. An updated version of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request) is submitted at Deadline 1A. As the footprint area for the Friston (Kiln Lane) substation would not change, but rather where it could be constructed within the lateral Limits of Deviation, the proposed landscape mitigation would not change as demonstrated by the updated figure. Consequently, no additional changes are required to any other part of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059], beyond updates to the Order Limits shown in Figures 1 and 3 as a result of proposed Change 5 (see Table 3.11 below).</p>
REP1-047	6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity	<p>The proposed change expands the Limits of Deviation. At this location a hedgerow will be removed during construction, which has already been assessed within the submitted ES chapter (such as in paragraph 2.9.181). The expansion of the Limits of Deviation does not expand the construction footprint of the Friston (Kiln Lane) substation but allows the siting of the substation to be moved laterally where most appropriate. This means that no more hedgerow than previously assessed would be removed as part of this change. Therefore, the assessment in the ES chapter remains the same, with no new or different likely significant effects and no further mitigation required.</p>
APP-050	6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage	<p>There are no designated heritage receptors or known non-designated heritage receptors in the larger Limits of Deviation associated with the proposed change. As such, the proposed change would not result in any new or different likely significant effects on heritage assets to those reported in the ES chapter. The assessment within ES chapter remains unchanged and further mitigation measures are not necessary.</p>
APP-051	6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment	<p>The proposed change does not introduce potential works to or near any different surface water receptors and there would be no change to the overarching drainage design principles set out within the ES. Therefore, no new or different significant environmental effects on the water environment are anticipated as a result of the proposed change, when compared to the design assessed within the ES. No new surveys, assessment or modelling are required. The overall</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		assessment within the ES remains unchanged, and no further mitigation is considered necessary.
APP-052	6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology	Given the nature of the change, there would be no new or different likely significant environmental effects on geology and hydrogeology as a result of the proposed change when compared to the design assessed within the ES.
PDA-019	6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils	There would not be any new or different likely significant effects on agriculture and soils as a result of the proposed change when compared to the design and assessment presented within the ES. All the land within the proposed Limits of Deviation is predicted to comprise best and most versatile (BMV) land), but the proposed footprint area of the substation itself is the same and so the same amount of BMV land would be impacted wherever the substation is constructed within the Limits of Deviation.
APP-054	6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport	The proposed change does not affect the proposals with respect to traffic and transport, as the same vehicular access arrangements (internal haul road) and PRow closures / diversions will be in place. Therefore, this does not introduce any changes to the assessment and there are no new or different likely significant effects with regards to traffic and transport and no further mitigation is considered to be necessary.
APP-055	6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality	The change to the Limits of Deviation results in a slightly larger study area for the assessment of back-up diesel generator emissions at Friston (Kiln Lane) substation. However, there are no additional human or ecological receptors in this wider study area. Similarly, the change to the Limits of Deviation does not result in additional human or ecological receptors falling into the Non-Road Mobile Machinery (NRMM) study area. The proposed change is not expected to affect the proposals with respect to vehicle movements, as the same vehicular access arrangements will be in place. Therefore, the overall assessment within the ES remains unchanged, and no further mitigation is considered necessary.
AS-109	6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration	The distance to nearby noise sensitive receptors is sufficiently large at this location that significant adverse effects are not anticipated within the ES during construction or operation. The proposed change to the Limits of Deviation does not bring the potential final location of the

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		substation close enough to any nearby noise sensitive receptors to change the conclusions in the ES chapter.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism	There would be no new or different significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change. As set out above for traffic and transport, the same PRoW closures and diversion will be in place as identified in the ES.
APP-058	6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing	Given the nature of the proposed change it does not introduce any changes to the assessments of landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. As such, there are no new or different significant environmental effects on health and wellbeing. There is no change to the overall outcome of this ES chapter, and no further mitigation is considered necessary.
APP-059	6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects	Given there is no change in the conclusions presented in each of the topics above and there would be no change to the sources of intra-project effects, the proposed change does not alter the conclusions in terms of likely significant intra-project effects reported in this ES chapter.
APP-060	6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects	The proposed change does not alter the Proposed Project's interaction with other developments, therefore the proposed change does not alter the conclusions in terms of likely significant inter-project effects reported in this ES chapter.
APP-085	6.2.5.1 Part 5 Combined Chapter 1 Climate Change	Whilst the Limits of Deviation are larger, the footprint area of the substation remains the same. Therefore, the same area of land would be impacted, and so the proposed change does not

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		alter the assessment results of the submitted ES. There would be no new or different likely significant effects with regards to climate change as a result of the proposed change.
APP-086	6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project	Given there is no change in the conclusions presented in each of the topics in Table 3.1, Table 3.3, Table 3.5, Table 3.7 and Table 3.11 it is considered that, when combined, the proposed changes would not result in any new or different likely significant Project-wide (combined) effects reported in this ES chapter.

3.3.2 Table 3.4 provides a review of whether Change 2 would change the findings reported in other environmental assessments included within Volume 6 of the DCO application.

Table 3.4 Review of other Volume 6 assessment conclusions as a result of Change 2

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-289	6.5 Electric and Magnetic Field Compliance Report	Given the nature of Change 2, the conclusions of this report do not change.
REP1-071	6.6 (C) Habitats Regulations Assessment Report	Given the nature of Change 2 and the absence of impact pathways to European designated sites, the conclusions of the HRA do not change.
APP-291	6.7 Statement of Statutory Nuisance	As this report draws on information about impacts from the ES, and there are no new or different likely significant environmental effects reported in the ES as a result of this proposed change (see Table 3.3) it is concluded that there are no changes to the conclusions to the Statement of Statutory Nuisance.

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-292	6.8 Flood Risk Assessment	<p>The proposed change does not introduce any new or different effects on flood risk to and arising from the Proposed Project. No further mitigation is considered necessary.</p> <p>Comments received from stakeholders advise that increased coordination with SPR with regards to proposals for managing surface water drainage from the Friston (Kiln Lane) substation would be beneficial. The proposed change supports the coordination and future-proofing of the Proposed Project interfaces.</p>
APP-293	6.9 Water Framework Directive Assessment	<p>The proposed change is located within the existing Zone of Interest of the WFD Assessment. Therefore, it does not interact with any new surface, transitional or coastal WFD waterbodies that are not already screened in to the assessment reported in Application Document 6.9 Water Framework Directive Assessment [APP-293]. There are no notable changes to the Proposed Project activities compared to the existing application, therefore there would be no new or different effects with regards to the impact on WFD waterbodies as a result of the proposed change.</p>
APP-294 and APP-295	6.10 Arboricultural Impact Assessment Part 1 of 2; 6.10 Arboricultural Impact Assessment Part 2 of 2	<p>The proposed change relates to a location where all trees and hedgerows were identified in the DCO application for removal to facilitate the Proposed Project with no trees retained. The proposed change therefore does not present any changes to tree related impacts assessed in Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295].</p>
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.12 (C) Biodiversity Net Gain Feasibility Report.	<p>The expansion of the Limits of Deviation does not expand the construction footprint of the Friston (Kiln Lane) substation but allows the siting of the substation to be moved laterally where most appropriate with similar habitats to be impacted. Therefore, the proposed change will result in a minor change (at most) to the BNG metric calculation as presented in Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report submitted at Deadline 1A. It would be a small change in the overall context of the Proposed Project’s Order Limits and it is considered that this will not result in a significant change to the number of units required to achieve a 10% net gain. All changes will be captured in the detailed design BNG assessment.</p>

3.4 Change 3: Change to the Order Limits South East of Friston to provide flexibility in the route of an underground cable and haul road, Suffolk

- 3.4.1 Table 3.5 provides a review of whether Change 3 would result in any new or different likely significant environmental effects compared to those reported within the ES previously submitted, including updates to chapters following submission of the DCO application.

Table 3.5 Review of ES conclusions as a result of Change 3

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-048	6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual	<p>The proposed change widens the Order Limits within Suffolk Coastal Landscape Character Assessment K3: Aldringham and Friston Sandlands. The widened Order Limits could result in the temporary loss of agricultural land and the potential removal of additional field boundary vegetation as identified in the Arboricultural Impact Assessment section in Table 3.6 below, depending on the final alignment taken for the HVDC cable route and haul road. New commitments identified in the Arboricultural Impact Assessment section of Table 3.6 below are secured through measure A19 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A. These would be adhered to, therefore minimising the effects of the potential additional tree loss.</p> <p>Given that the nature and duration of construction activity would not change from what was previously assessed in the ES chapter and the land would be reinstated in accordance with the same measures included in the DCO Application in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], there would be no new or different likely significant effects on landscape character or visual amenity to those reported in the ES chapter. Consequently, no further mitigation measures are therefore necessary.</p>
REP1-047	6.2.2.2 (C) Part 2 Suffolk Chapter 2	<p>Much of the area of the wider Order Limits covered by this proposed change was surveyed for habitats and protected species for the original ES chapter and its appendices, including for birds, dormouse, badgers and bats as shown in the ES chapter appendices and associated</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
	Ecology and Biodiversity	<p>mapping (see Application Document 6.3.2.2.A ES Appendix 2.2.A Extended Phase 1 Habitat Survey Report CONFIDENTIAL [AS-004] through to Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108]). However, an updated extended Phase 1 Habitat Survey, badger survey, and protected species scoping survey was undertaken on 20 October 2025 to update habitat mapping and inform this assessment, given the proposed change to the Order Limits. This is presented in Application Document 9.76.5.6 Change Request Appendix F: Change 3 Phase 1 Habitat Survey Results submitted at Deadline 1A. Hedgerows, trees and badger setts and signs were already recorded from previous surveys as reported in the ES chapter. The survey confirmed the location of an outlier badger sett originally identified in the submitted ES. No additional badger setts were recorded in the survey area. Further signs of badger activity have been recorded, which is usual with active setts within the vicinity. There is also a main sett to the north of the 2025 survey area, identified in the submitted ES, which is within the Order Limits of the construction compound and cable route. This is not a change to the supporting information submitted with the DCO.</p> <p>Whichever option is taken forward for the proposed cable route alignment within the wider Order Limits introduced as part of this proposed change, it will be designed in such a way that it ensures an appropriate offset from the main and outlier badger setts located within this section of the Order Limits. This is already contained in measure B26 of the Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102].</p> <p>Several trees have been identified that contain features potentially suitable for roosting bats. However, none are scheduled for removal as part of the DCO Application as a result of this proposed change. Moreover, Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] already contains commitment B06 which stipulates provision of replacement bat boxes with any trees with moderate or high roost potential that are removed. The Order Limits for this proposed change are drawn wide enough to enable routing around these constraints. The final cable route/access alignment will therefore avoid removal of trees with bat roost potential. There is a veteran tree immediately to the east of the Order Limits as identified in the Arboricultural Impact Assessment section of Table 3.6 below. A requirement to retain this tree with appropriate root protection area buffers is proposed. New mitigation commitments relating to</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-050	6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage	<p data-bbox="741 260 2078 403">trees in this location are identified in the Arboricultural Impact Assessment section of Table 3.6 below and are secured through measure A19 within Application Document (B) 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A.</p> <p data-bbox="741 416 2074 560">The proposed changes to the Order Limits introduce no other new impacts or effects that were not already considered in the ES, although the precise location of the impact may differ from that in the submitted ES. Therefore, the overall assessment within the ES remains unchanged, with no new or different likely significant effects and no further mitigation deemed necessary.</p> <p data-bbox="741 587 2051 882">The results of the Phase 2b evaluation trenching in Suffolk Archaeological Evaluation Report (Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]) identified a possible prehistoric henge feature near Friston which was considered by Historic England (HE) and the Archaeological Advisor to the local planning authority from Suffolk County Council Archaeological Service (SCCAS) to be of national importance and of schedulable quality, subject to further investigation. As such, the initial advice from HE and SCCAS was that mitigation through design would be deemed the most appropriate mitigation, with the asset avoided.</p> <p data-bbox="741 895 2074 1222">Additional geophysical survey undertaken in October 2025 (Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report submitted at Deadline 1A) has since confirmed that the asset is a D-shaped enclosure rather than a henge and, following feedback from SCCAS and HE, it is no longer considered to be of national importance and would not meet the criteria for scheduling. HE and SCCAS further confirmed in their feedback to the additional geophysical survey results that mitigation through archaeological excavation would now be acceptable. Additional evaluation trenching in this area is still proposed to better understand the feature which, if confirmed as a D-shaped later prehistoric enclosure, would be of regional importance and medium heritage value.</p> <p data-bbox="741 1235 2074 1450">National Grid proposes to retain the option of providing the cable route and haul road as set out in the submitted DCO application. This option would result in permanent impacts to a large proportion of the D-shaped enclosure, constituting a medium impact and a likely moderate adverse significant effect. It has been agreed with HE and SCCAS that mitigation through archaeological excavation would be acceptable, but only if the entire feature is excavated. As such the proposed change to the Order Limits takes in the full extent of the enclosure, plus an</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		<p>extended area around the enclosure to facilitate its full excavation, including associated internal and external remains. This mitigation will be detailed in the Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk secured by Requirement 14 in Schedule 3 of the DCO. The OWSI is currently being updated to incorporate the agreed measures and will be submitted at a later Deadline subject to the ExA accepting the proposed change. The successful completion of the agreed mitigation will result in a minor adverse residual effect, which is not significant.</p> <p>The proposed change also incorporates an extension of the Order Limits to the east of the enclosure to provide flexibility for an alternative cable and haul road route to the east of the feature as well as flexibility to respond to the additional evaluation trenching due to be completed. This option would avoid impacts to the enclosure but would impact a small proportion of an extensive prehistoric field system which is of local importance and low heritage value. This would constitute a small impact, resulting in a negligible effect, which is not significant. The significance of the effect is no greater than that reported in the submitted ES chapter and an appropriate level of mitigation, agreed with SCCAS, would be secured in the DCO via the updated Outline Onshore OWSI, which is secured by Requirement 14 in Schedule 3 of the DCO.</p> <p>The option of being able to install the cable route and haul road as set out in the submitted DCO would result in a new likely significant effect, as the D-shaped enclosure was identified from surveys completed following submission of the submitted ES chapter. However, the successful completion of the agreed mitigation will result in a minor adverse residual effect, which is not significant.</p>
APP-051	6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment	<p>The proposed change does not introduce works to or near any new surface water receptors and there would be no change to the overarching drainage design principles set out within the ES. Therefore, no new or different likely significant effects on the water environment as a result of the proposed change are anticipated. No new surveys, assessment or modelling are required. Overall, the assessment within the ES remains unchanged, and no further mitigation is considered necessary.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-052	6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology	Given the minor nature of the proposed change, there would be no new or different likely significant environmental effects on geology and hydrogeology as a result of the proposed change when compared to the design assessed within the ES.
PDA-019	6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils	The proposed change includes additional agricultural land within the Order Limits, which is currently under arable production. The land is provisionally mapped as being Provisional Grade 4 within the South/West extension, and Provisional Grade 3 within the North/East extension, therefore this area could potentially comprise BMV land. However, this land would only be required to enable the cable alignment to be re-routed around the henge feature and as such, it does not significantly increase the total extant of land required to construct the Proposed Project. The land within the Order Limits as submitted in the DCO Application is predicted to be Grade 3b (i.e. non-BMV) and so land immediately adjacent to this has the potential to also be non-BMV, subject to the results of the Agricultural Land Classification (ALC) and soil surveys which are committed to be undertaken preconstruction. As the land would be required for temporary works and the land reinstated to pre-construction condition it is considered that there would not be any new or different likely significant effects on agriculture and soils as a result of the proposed change when compared to the assessment reported within the ES.
APP-054	6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport	The proposed change is not expected to affect the proposals with respect to traffic and transport, as the same vehicular access arrangements (access S-BM04 on the B1069 Snape Road) will be utilised to access the internal haul road which will be realigned within the revised Order Limits to avoid the known heritage feature, if necessary. No PRoW will be affected. Therefore, the overall assessment within the ES remains unchanged, with no new or different likely significant effects and no further mitigation is considered to be necessary.
APP-055	6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality	The proposed change does not alter any of the assumptions on construction vehicles already assessed in the ES chapter. However, the proposed change to the Order Limits would result in additional human receptors falling within the construction dust study area, such as Bull's Hall. This does not affect the outcome of the construction dust assessment as the mitigation measures already proposed in the ES chapter are for high-risk sites, which is the highest level of risk. Therefore, additional mitigation measures would not be required. With the implementation of the proposed mitigation measures, the residual effect from all dust

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		generating activity is predicted to be not significant and there is no change to the conclusions of the ES chapter.
AS-109	6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration.	The proposed change does not alter the conclusions of the ES chapter, with no new or different significant effects. It may bring construction works closer to some nearby noise sensitive receptors on Snape Road depending on the final location of the works within the Order Limits. However, the distance is sufficiently large that likely significant adverse effects are not expected during construction, particularly with the implementation of best practicable means to reduce effects as set out in the ES chapter.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism	Given the minor nature of the proposed change, there would be no new or different likely significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change when compared to the design assessed within the ES. As stated in the traffic and transport section above no PRow will be affected.
APP-058	6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing	Given the minor nature of the proposed change, there would be no new or different likely significant environmental effects on health and wellbeing as a result of the proposed change when compared to the design assessed within the ES.
APP-059	6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects	Given there is no change in the conclusions presented in each of the topics above and there would be no change to the sources of intra-project effects, the proposed change does not alter the conclusions in terms of likely significant intra-project effects reported in this ES chapter.
APP-060	6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme	The proposed change does not alter the Proposed Project's interaction with other developments, therefore, the proposed change does not alter the conclusions in terms of significant inter-project effects reported in this ES chapter.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
	Inter-Project Cumulative Effects	
APP-085	6.2.5.1 Part 5 Combined Chapter 1 Climate Change	<p>Adjusting the cable route may result in a slight change to the quantity of construction materials required (e.g. cable) and thereby may result in a slight change to the total embodied carbon from construction materials as estimated for the assessment in the ES. However, this small change is not significant in the context of the lifecycle greenhouse gas (GHG) assessment and is anticipated to have a negligible impact on the overall lifecycle GHG emissions associated with the Proposed Project. Therefore, there is no change to the conclusions of the lifecycle GHG assessment.</p> <p>Due to the resolution/granularity of the climate change risk assessment (CCRA) in accordance with available datasets, this potential small change in route alignment is into significant in the context of the CCRA. The proposed change would not change the assessed climate risk profile of the Proposed Project as reported in the ES. Therefore, this proposed change would not alter the conclusions of the CCRA.</p>
APP-086	6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project	<p>Given there is no change in the conclusions presented in each of the topics in Table 3.1, Table 3.3, Table 3.5, Table 3.7 and Table 3.11, it is considered that, when combined, the proposed changes would not result in any new or different likely significant Project-wide (combined) effects reported in this ES chapter.</p>

3.4.2 Table 3.6 provides a review of whether Change 3 would change the findings reported in other environmental assessments included within Volume 6 of the DCO application.

Table 3.6 Review of other Volume 6 assessment conclusions as a result of Change 3

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-289	6.5 Electric and Magnetic Field Compliance Report	Given the nature of Change 3, the conclusions of this report do not change.
REP1-071	6.6 (C) Habitats Regulations Assessment Report	Given the nature of Change 3 and the absence of impact pathways to European designated sites, the conclusions of the HRA do not change.
APP-291	6.7 Statement of Statutory Nuisance	As this report draws on information about impacts from the ES, and there are no new or different significant environmental effects reported in the ES as a result of this proposed change (see Table 3.5) it is concluded that there are no changes to the conclusions to the Statement of Statutory Nuisance.
APP-292	6.8 Flood Risk Assessment	The flood risk to the land within the proposed new Order Limits from all sources remains largely the same. There are several small, localised areas at a low to high risk of surface water flooding within the extended Order Limits, likely resulting from localised topographic variation. However, the proposed change would not interact with any surface water flow routes and as such there would be no new or different likely significant effects with regards to flood risk as a result of the proposed change, and no further mitigation is considered necessary.
APP-293	6.9 Water Framework Directive Assessment	The proposed change is located within the existing Zone of Interest of the WFD Assessment. Therefore, it does not interact with any new surface, transitional or coastal WFD waterbodies that are not already screened in to the assessment reported in Application Document 6.9 Water Framework Directive Assessment [APP-293] . There are no notable changes to the Proposed Project activities compared to the existing application. Therefore, there would be no new or different effects with regards to the impact on WFD waterbodies as a result of the proposed change.

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-294 and APP-295	6.10 Arboricultural Impact Assessment Part 1 of 2; 6.10 Arboricultural Impact Assessment Part 2 of 2	<p>The proposed change has resulted in the requirement for further tree surveys in accordance with BS5837:2012. The surveys, undertaken on 4 and 5 November 2025, identified one individual tree classed as high quality (Category A), 28 individual trees, seven groups, four hedges and three woodlands identified as moderate quality (Category B), 14 individual trees, four groups and two hedgerows identified as low quality (Category C) and three individual trees and one group identified as unsuitable for retention as living trees for more than ten years in the context of the current land use (Category U). Newly surveyed trees are included in the updated Tree Survey Schedule (Suffolk) (included as Application Document 9.76.5.7 Change Request Appendix G: Tree Survey Schedule Extract Suffolk Onshore Scheme submitted at Deadline 1A) and range from tree group reference G1161 to tree reference T1227. This should be read in conjunction with Appendix C: Tree Survey Schedule Suffolk Onshore Scheme from Application Document 6.10 Arboricultural Impact Assessment [APP-294 to APP-295]. They are also shown in Application Document 9.76.5.8 Change Request Appendix H: Tree Constraints Plans Suffolk Onshore Scheme submitted at Deadline 1A.</p> <p>A desk-based review of statutory and non-statutory designations related to trees was undertaken on 4 November 2025 and no statutory or non-statutory designations were identified such as Tree Preservation Orders, Conservation Areas or Ancient woodlands near to these surveyed trees.</p> <p>The proposed change has resulted in the potential impact to, or loss of three low quality tree features, namely H367S, H385S and H386S (as shown by labels on sheet 05 of the updated Tree Protection Plan (Suffolk) included as Application Document 9.76.5.9 Change Request Appendix I: Tree Protection Plans Suffolk Onshore Scheme submitted at Deadline 1A) which may be required to facilitate the Proposed Project. Both H385S and H386S were already identified as part removed in Application Document 6.10 Arboricultural Impact Assessment [APP-294 to APP-295], however the proposed change may require an amendment to the location or orientation of the loss (although the magnitude of loss from these features will not be substantially altered). All moderate and high-quality tree features, including the identified veteran tree (T1227), will be fully retained and protected in accordance with the tree protection fencing shown on Sheet 5 of Application Document 9.76.5.9 Change Request Appendix I: Tree Protection Plans Suffolk Onshore Scheme submitted at</p>

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
		Deadline 1A. The tree protection fencing ensures an appropriate buffer around the root protection areas of these trees will be retained to ensure works associated with the Proposed Project do not impact these trees. This is secured through measure A19 in the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A. The final extent of the impact to low quality tree features in this location of the Order Limits will be confirmed as part of the detailed design once a final cable and haul road alignment has been selected.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.12 (C) Biodiversity Net Gain Feasibility Report	Whilst the Order Limits have been expanded, this is to allow flexibility in the design. A similar construction footprint is assumed to be required for the Proposed Project in this area. Therefore, the proposed change will result in a minor change (at most) to the BNG metric calculation as presented in the BNG Feasibility Report. It would be a small change in the overall context of the Proposed Project's Order Limits and it is considered that this will not result in a significant change to the number of units required to achieve a 10% net gain. All changes will be captured in the detailed design BNG assessment.

3.5 Change 4: Benhall railway bridge, Suffolk

- 3.5.1 Table 3.7 provides a review of whether Change 4 would result in any new or different likely significant environmental effects compared to those reported within the ES previously submitted, including updates to chapters following submission of the DCO application.

Table 3.7 Review of ES conclusions as a result of Change 4 and Additional Assessment of the Implications of Traffic Management associated with Abnormal Indivisible Load vehicles at Benhall Bridge

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-048	6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual	<p>The two options considered in this proposed change are not expected to change the conclusions of the ES chapter. The proposed change introduces a new area to the Order Limits comprising part of the highway (B1121 and junction to the A12) and railway line. This would be temporarily occupied by construction plant for the duration of the proposed temporary road closures.</p> <p>The works would introduce temporary construction activity closer to some nearby sensitive visual receptors, including direct views from residential receptors on Shotts Meadow to the northeast and recreational receptors along the local public footpath network (Benhall 137, routes 26 and 34). The part of the works on the Benhall Railway Bridge would be largely visually contained due to existing mature vegetation cover alongside the B1121 and railway line. Any views towards the works would slightly alter the composition of the view however, the construction activity would be generally viewed against the backdrop of mature vegetation alongside the B1121 and railway line, and within the context of vehicle movement along the B1121, wood pole lines and an overhead line in the background.</p> <p>Other residential receptors would include potential views from Whitearch Park Residential Park Homes to the south, however, this is contained within mature vegetation therefore intervisibility with the works is likely to be limited. It would also include residential properties further to the northeast and east, such as off The Beeches, Mill Lane, Festival Close and Meadow Walk, however such receptors would be at a greater distance and typically with intervening hedgerow and occasional tree vegetation which would partially screen and soften views toward the temporary works.</p> <p>Other visual receptors in the vicinity, which are considered to have a lower sensitivity, would include visitors to a local business off the B1121 in close proximity to the works located immediately to the east of the railway line and road users of the B1121. The potential visual effects are considered to be limited in the surrounding landscape due to the containment of the works by mature vegetation cover and built form.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		<p>The proposed change to the Order Limits would be predominantly located within the Suffolk Coastal Landscape Character Assessment Landscape Character Area (LCA) O1: Benhall Estate Sandlands and a small part within LCA B4: Fromus Valley.</p> <p>For LCA O1, the works would be to the east of the railway corridor, which is referred to within the published study as having separation from the wider LCA, which would limit wider influence. The works are located in close proximity to the A12 corridor which would lessen influence on the wider peaceful and rural character of the LCA.</p> <p>For LCA B4, the influence of the works would be within the part of the outer edges of the LCA influenced by road and rail infrastructure, as described within the published assessment. Therefore, the influence on the key characteristics of the LCA, including reference to the river valley character, historic parkland landscape and relationship with Saxumundham would not be affected. As noted above, the geographical extent of influence of the works across the LCAs would be highly limited due to the surrounding mature vegetation cover and built form.</p> <p>There would be localised vegetation removal to facilitate the works which would include the removal of a small self-set tree on the bridge (both options), the removal of a tree very close to the north of the bridge on the railway cutting (Option 2 minor works to fix the bridge only) and some localised pruning and the potential for partial removal of a tree group for Option 2 (minor works to fix the bridge) only. The scale of the localised vegetation removal and within the context of the existing mature vegetation cover in the vicinity, is not considered to affect this characteristic feature of the local landscape.</p> <p>Overall, the temporary and localised nature of the proposed change would not introduce any new or different likely significant environmental effects on landscape and visual receptors within the ES chapter previously submitted.</p>
REP1-047	6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity	<p>An extended Phase 1 Habitat Survey and protected species scoping survey was completed of the additional land to be included within the Order Limits as part of proposed Change 4, on 5 November 2025. The survey results are reported in Application Document 9.76.5.10 Change Request Appendix J: Change 4 Phase 1 Habitat Survey Results submitted at Deadline 1A. This survey identified a four-metre-wide grass verge on the north side of the road, adjacent to the bridge, comprising species-poor neutral grassland dominated by false oat-grass (<i>Arrhenatherum elatius</i>). Several trees or tree groups are present around the bridge, consisting</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-050	6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage	<p>mainly of sycamore. These were all deemed unsuitable for roosting bats. Along the railway embankment below the bridge there was dense scrub, which could not be checked for badger presence due to a lack of access to the rail line. It is therefore assumed badgers could be present. There were no suitable features for roosting bats visible on the top of the bridge. The underside could not be viewed due to lack of access to the rail line. Therefore, the bridge has been given likely low (rather than negligible) suitability for roosting bats. There is a low species-poor hedgerow east of the bridge.</p> <p>There are two options being considered at this location for this proposed change. Some vegetation removal may be required for either option. If any trees overhang the road these will be pruned to be level with the highway boundary in both options and in Option 2 vegetation adjacent to the railway boundary may also be pruned back to access the bridge. Those trees identified for removal are considered as unsuitable for roosting bats. Neither option will affect the low species-poor hedgerow.</p> <p>Prior to works being undertaken to the bridge, a bat roost potential survey will be undertaken from the rail line to review the low potential assigned and suitably assess the presence/likely absence of roosting bats to ensure legal compliance. This will then inform the details of the bridge works for Option 2.</p> <p>The scrub on the rail embankment is suitable for badgers, and this will require further survey prior to works commencing. Overall, the assessment within the ES remains unchanged since badgers are already identified as a receptor in the ES chapter, and no further mitigation is considered necessary at this stage until further surveys have confirmed presence/likely absence of roosting bats and badgers and the precise details of the works to the bridge and any need for rail embankment access are confirmed.</p> <p>Therefore, the proposed change does not introduce any potential for new or different likely significant effects.</p> <p>The options associated with this proposed change will not require ground disturbance and therefore there is no likelihood of buried heritage assets being impacted. The temporary nature of the works will not result in significant effects to heritage assets arising from changes to their setting. The closest designated asset is Grade II listed Benhall Cottage (NHLE 1030908), located approximately 220 m to the north-west, and the distance and enclosed nature of the</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		asset's setting will preclude any perception of change. The assessment within the ES remains unchanged and further mitigation measures are unnecessary.
APP-051	6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment	Given the nature of the proposed change and the two options being considered, there would be no new or different likely significant environmental effects on the water environment as a result of the proposed change. No new surveys, assessment or modelling are required. The conclusions within the ES remain the same with no further mitigation considered necessary.
APP-052	6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology	Given the nature of the proposed change and the two options being considered, there would be no new or different likely significant environmental effects on geology and hydrogeology as a result of the proposed change when compared to the design assessed within the ES.
PDA-019	6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils	As no additional agricultural land would be required, there would not be any new or different likely significant effects on agriculture and soils as a result of the proposed change.
APP-054	6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport	There are two proposed options to accommodate Abnormal Indivisible Load (AIL) vehicles across Benhall Bridge which include the following: Option 1 - Installation of the 'mini-bridge' within the highway boundary only and Option 2 – Minor works to fix the bridge. This would allow for the AILs which are likely to exceed the current bridge's weight limit allowance to access across Benhall Bridge. Both options would require temporary road closure(s) on the B1121 Main Road (except for local access e.g. Benhall residents, users of Whitearch Park Residential Park Homes and local businesses) to accommodate the proposed works on Benhall Bridge, which has the potential to introduce new environmental effects on the surrounding highway network (from a traffic and transport perspective, as previously reported in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]) due to the diversion of Future Baseline traffic onto other routes in combination with construction traffic. This has been reviewed further below and it has been concluded that there is no potential for significant adverse effects to arise, with the additional embedded mitigation identified (e.g. maintaining local vehicular access and making a shuttle/ taxi service available to residents of Whitearch Park Residential Park Homes who do not have access to a vehicle), to be secured as part of measures TT11 and TT12 in the updated version of Application

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-055	6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality	<p data-bbox="741 260 1966 331">Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request) submitted at Deadline 1A.</p> <p data-bbox="741 344 2074 707">In addition, both options would require the northern end of PRow E-137/026/0 to be temporarily closed when the temporary road closure(s) are in place, at the location where this PRow currently joins the south-eastern footway on Benhall Bridge. This change has also been reviewed further below and it is concluded that there is no potential for significant adverse effects to arise, with the additional embedded mitigation identified (e.g. keeping the remainder of the PRow open, installing signage to advise users of the closure/works and making a shuttle/taxi service available to residents of Whitearch Park Residential Park Homes who do not have access to a vehicle), to be secured as part of measure TT11 in the updated version of Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request) submitted at Deadline 1A.</p> <p data-bbox="741 719 2074 938">In addition, considerations relating to the existing footways on Benhall Bridge which would be temporarily closed during the proposed works on Benhall Bridge, and the temporary suspension of the bus stops on the B1121 Main Road to the east of Benhall Bridge when the B1121 Main Road is temporarily closed, have also been reviewed further below. Several short-term possessions of the railway may also be required for Option 2, which would be subject to agreement with Network Rail.</p> <p data-bbox="741 951 2022 1023">Further details on the traffic and transport assessment of Change 4 are reported below this table in paragraphs 3.5.3 to 3.5.40.</p> <p data-bbox="741 1050 2033 1158">Both options associated with the proposed change introduce a new area to the Order Limits which would introduce new sensitive human receptors to the construction dust and construction traffic study areas.</p> <p data-bbox="741 1171 2051 1385">In terms of construction dust, the two proposed options would result in additional human receptors to fall within the construction dust study area, such as the properties on Shotts Meadow, Mill Lane and Festival Close. This does not affect the outcome of the construction dust assessment as the mitigation measures proposed are for high-risk sites, which is the highest level of risk. Therefore, additional mitigation measures would not be required and the implementation of these measures would ensure effects are not significant.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		Both options would require temporary road closure(s) on the B1121 Main Road to accommodate the proposed works on Benhall Bridge. Option 1 would have a road closure for a maximum of 45 days (15 temporary road closures of the B1121 for three day periods) and option 2 for a maximum of 28 days. This would result in traffic being diverted onto other roads, in particular, the B1121 Main Road east of the A12. However, averaged over a year, the increases/decreases in traffic flows, as set out in Table 3.9 would be well below the Environmental Protection UK and Institute of Air Quality Management air quality screening criteria, as set out in paragraph 8.4.15 of Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] . As such, it is considered that there would be no potential for any new or different likely significant effects in relation to construction vehicle emissions.
AS-109	6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration	The proposed change does not change the conclusions of the ES chapter. It introduces a new area to the Order Limits which would bring temporary construction works closer to some nearby noise sensitive receptors on Shotts Meadow to the northeast and Whitearch Park Residential Park Homes to the south. However, the distance is sufficient that likely significant adverse effects are not expected during construction works associated with either option, particularly with the implementation of best practicable means to reduce effects.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism	<p>Both options would require a temporary road closure on the B1121 to accommodate the proposed works on Benhall Bridge, which has the potential to introduce new severance impacts between residents and community facilities, businesses and open spaces. As set out in Application Document 7.5.3.2 (B) CEMP Appendix B: Register of Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A (see measure TT12), local access for residents and businesses in Benhall will be maintained, although minor delays to access may occur. However, in line with the Traffic and Transport assessment findings, it has been concluded that there are not anticipated to be any new or different likely significant effects as a result of the proposed change with the additional mitigation identified. This is because the temporary closure is not expected to lead to a significant change in access patterns or severance between residents and community facilities, businesses and open spaces.</p> <p>Both options would also require the temporary closure of Footpath 137/026/0, which could introduce a new effect on this PRow. This has been assessed within a sub-section below this</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		<p>table in paragraphs 3.5.41 to 3.5.46 and concludes that no potential for significant adverse effects are expected to arise. This is a result of the limited duration of the temporary closure and the availability of comparable alternative routes within the local vicinity.</p> <p>Therefore, there would be no new or different likely significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change.</p>
APP-058	6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing	<p>The new area of the Order Limits is adjacent to residential properties not previously assessed in the ES. However, it is understood that air quality and noise impacts remain within expected limits, and existing mitigation measures from the DCO submission for high-risk dust sites and for noise (via best practicable means) are considered sufficient, with no additional health-related effects anticipated.</p> <p>Both options would require the temporary closure of a new PRow receptor, E-137/026/0. This has been reviewed as set out above and concludes that no potential for significant adverse effects are expected to arise, with the additional mitigation identified within an updated version of Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request) submitted at Deadline 1A. As such, no additional health-related effects are anticipated as access is maintained to PRowS which is important for supporting physical activity, mental wellbeing, and community connectivity.</p> <p>Overall, there would be no new or different likely significant environmental effects on health and wellbeing as a result of the proposed change.</p>
APP-059	6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects	<p>Whilst this is a new area added to the Order Limits, given its proximity to the rest of the Proposed Project, the nature of the proposed change and given the conclusions presented in each of the topics above in Table 3.7, there would be no change to the source of intra-project effects, therefore the proposed change does not alter the conclusions in terms of significant intra-project effects reported in this ES chapter.</p>
APP-060	6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects	<p>Whilst this is a new area added to the Order Limits, given its proximity to the rest of the Proposed Project, the nature of the proposed change and given the conclusions presented in each of the topics above in Table 3.7, the proposed change is unlikely to alter the Proposed Project's interaction with other developments, therefore conclusions in terms of significant inter-project effects reported in this ES chapter.</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-085	6.2.5.1 Part 5 Combined Chapter 1 Climate Change	The temporary works may result in some additional emissions associated with the construction of the temporary bridge. However, these emissions are minor in nature and not significant, and as such would not affect the conclusions set out in the ES. Therefore, there would be no new or different significant effects with regards to climate change as a result of the proposed change.
APP-086	6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project	Given there is no change in the conclusions presented in each of the topics in Table 3.1, Table 3.3, Table 3.5, Table 3.7 and Table 3.11, it is considered that, when combined, the proposed changes would not result in any new or different likely significant Project-wide (combined) effects reported in this ES chapter.

3.5.2 Table 3.8 provides a review of whether Change 4 would change the findings reported in other environmental assessments included within Volume 6 of the DCO application.

Table 3.8 Review of other Volume 6 assessment conclusions as a result of Change 4

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-289	6.5 Electric and Magnetic Field Compliance Report	Given the nature of Change 4, the conclusions of this report do not change.
REP1-071	6.6 (C) Habitats Regulations Assessment Report	Given the nature of Change 4 and the absence of impact pathways to European designated sites, the conclusions of the HRA do not change.

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-291	6.7 Statement of Statutory Nuisance	As this report draws on information about impacts from the ES, and there are no new or different significant environmental effects reported in the ES as a result of this proposed change (see Table 3.7) it is concluded that there are no changes to the conclusions to the Statement of Statutory Nuisance.
APP-292	6.8 Flood Risk Assessment	Flood risk within the proposed new area of the Order Limits has been reviewed. The land is at a low risk of flooding from rivers, surface water and groundwater. Given the low baseline flood risk and the nature of the design change, it does not introduce any new or different conclusions to the Flood Risk Assessment, and no further mitigation is considered necessary.
APP-293	6.9 Water Framework Directive Assessment	The proposed change is located within the existing Zone of Interest for the WFD Assessment. Therefore, it does not interact with any new surface, transitional or coastal WFD waterbodies that are not already screened in to the assessment reported in Application Document 6.9 Water Framework Directive Assessment [APP-293] . There are no major changes to the Proposed Project activities compared to the existing application. Therefore, there would be no new or different effects with regards to the impact on WFD waterbodies as a result of the proposed change.
APP-294 and APP-295	6.10 Arboricultural Impact Assessment Part 1 of 2; 6.10 Arboricultural Impact Assessment Part 2 of 2	The proposed change has resulted in the requirement for further tree surveys in accordance with BS5837:2012. The surveys, undertaken on 4 and 5 November 2025, identified one individual tree classed a high quality (Category A), 28 individual trees, seven groups, four hedges and three woodlands identified as moderate quality (Category B), 14 individual trees, four groups and two hedgerows identified as low quality (Category C) and three individual trees and one group identified as unsuitable for retention as living trees for more than ten years in the context of the current land use (Category U). Newly surveyed trees are included in the updated Tree Survey Schedule (Suffolk) (included as Application Document 9.76.5.7 Change Request Appendix G: Tree Survey Schedule Extract Suffolk Onshore Scheme submitted at Deadline 1A) and range from tree group reference G1161 to tree reference T1227. These are illustrated in Application Document 9.76.5.8 Change Request Appendix H Tree Constraints Plans Suffolk Onshore Scheme submitted at Deadline 1A and Application Document 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme submitted at Deadline 1A.

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
		<p>A desk-based review of statutory and non-statutory designations related to trees was undertaken on 4 November 2025 and several areas of Deciduous Woodland identified within the Priority Habitat Inventory were identified immediately adjacent to the additional land included within the Order Limits. No further statutory or non-statutory designations were identified such as Tree Preservation Orders, Conservation Areas or Ancient woodlands within or adjacent to the Order Limits.</p> <p>There are two options for the proposed change. Option 1 would result in the requirement to cut back overhanging trees within G1197 (moderate quality) to the highway boundary and the removal of T1181 a Category U (unsuitable) tree growing on the bridge itself.</p> <p>Option 2 would require trees to be cut back to the Network Rail boundary and/or highway boundary in the vicinity of the bridge including those works identified for Option 1, and the removal of T1196 (low quality) and the part removal of G1197 (moderate quality). Both options would also require the removal of T1168 (Category U), the part removal or cutting back (as required) of W1162 (moderate quality) and W1164 (moderate quality) to clear an existing layby/access route and finally the pruning of T1167 (low quality) to facilitate the works.</p> <p>Therefore, due to the small amount of additional tree loss required to facilitate the proposed change it is not considered to be significant.</p>
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.12 (C) Biodiversity Net Gain Feasibility Report.	<p>Given the minor nature of the tree loss and works to trees associated with the proposed change, this would result in a minor change to the BNG metric calculation. However, it is considered that this would be a small change in the overall context of the Proposed Project's Order Limits, which would not result in a significant change to the number of units required to achieve a 10% gain. All changes will be captured in the detailed design biodiversity net gain assessment.</p>

Traffic and Transport – Potential Impacts of Temporary Road Closure (Benhall Bridge)

Introduction

- 3.5.3 National Grid submitted an Outline Construction Traffic Management and Travel Plan - Suffolk **[AS-008]** with the DCO application that set out outline proposals for how construction traffic would be managed on the Proposed Project after consent. Requirement 6 in Schedule 3 of the draft Development Consent Order (Application Document 3.1) requires that a final Construction Traffic Management and Travel Plan (CTMTP) be submitted and approved by the relevant planning authority prior to commencement of development. This final plan must be substantially in accordance with the outline plan submitted. The reason that final plans are not submitted at the application stage is because insufficient detail is available on the construction programme, points of origin of delivery vehicles, suppliers and construction methods to produce a Construction Traffic Management Plan in detail at that stage.
- 3.5.4 The uncertainty over routing and construction traffic applies to Abnormal Indivisible Load (AIL) vehicles that will cross Benhall Bridge. The programme for these deliveries, including the potential for combining more than one vehicle in one trip, the points of origin and the dimensions of the final vehicles used, will not be available until the construction period. Further, the condition of the local highway network changes over time and this may affect vehicle routing as planned in construction. For all these reasons, it is not normally possible to specify the details of an approach to traffic management, AIL routing or minor measures to facilitate AIL deliveries in DCO applications and this is therefore not assessed in detail in the ES. The areas to be affected by traffic management are, however, set out in the Traffic Regulation Order Plans **[APP-024]**, and always included the stretch of the B1121 that includes Benhall Bridge. It should be emphasised that the need for vehicles to cross the bridge and for temporary traffic management to facilitate implementation of measures to enable AIL crossings, was already present in the Proposed Project and this does not therefore represent a change to the construction traffic management approach.
- 3.5.5 However, given the scale of interest in Benhall Bridge and queries raised in consultation responses to the proposed changes, National Grid has investigated the potential traffic management approach and approach to other AIL crossings in more detail than is required by the ES and is providing this detail below. Traffic and pedestrian management proposals below remain in outline, to be finalised in the Construction Traffic Management and Travel Plan submitted to discharge Requirement 6.

Road Users

- 3.5.6 As identified in Table 3.7, the proposed works associated with both options at Benhall Bridge will require the B1121 Main Road to be temporarily closed between the junctions with the A12 to the west and the B1121 Church Hill to the east (except for local access which will be retained e.g. for Benhall residents and users of Whitearch Park Residential Park Homes). The A12/ B1121 Main Road junction would also be closed as part of these works, to avoid temporary traffic signals on the B1121 Main Road and the potential for vehicles to queue back to the A12 (which was a concern raised by SCC Highways). The only vehicles permitted to access the B1121 Main Road from the A12 at this junction will be strictly limited to works vehicles and those associated with

Whitearch Park Residential Park Homes only. The anticipated duration(s) of the temporary road closure(s) for each Option is set out, as follows:

- Option 1: Approximately 15 road closures to install / remove the mini-bridge, with a duration of three days for each closure = total maximum duration of 45 days; or
- Option 2: A single road closure for a maximum duration of 28 days, early on in the construction phase.

3.5.7 The temporary road closure(s) would result in the redistribution of Future Baseline traffic onto other routes across the highway network. A spreadsheet model has been created based on the traffic flow diagrams which informed **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** to identify the existing routes that are currently expected to be used by traffic crossing Benhall Bridge and the likely alternative routes that would potentially be used when Benhall Bridge is temporarily closed and the associated changes in traffic levels across the highway network. The spreadsheet model has been prepared based on the same study area and traffic surveys which informed **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. It should be acknowledged that the spreadsheet model does not represent a strategic model which would explicitly look at re-assignment of vehicles; it is designed to provide an indication of potential changes in traffic flows across the network, to identify where potential impacts may arise and to inform any additional mitigation which may be needed. This approach is considered to be reasonable given that the main assessment work for the DCO submission was not informed by a strategic model, and the proposed temporary road closure(s) would only be short-term.

3.5.8 The Future Baseline traffic flows on the B1121 Main Road (via Benhall Bridge) have been identified based on the traffic surveys which were carried out at the A12 / B1121 (South) junction (S-RJ2) to the west of the bridge and the B1121 Main Road / B1121 Church Hill junction (S-RJ6) to the east, to identify the extent of traffic that would be diverted following any road closure. The traffic surveys were carried out in 2024 and the same traffic growth has been applied as identified in Table 7.23 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** to convert these existing traffic flows to the Future Baseline year of 2028. The spreadsheet model includes the same time periods as previously assessed, including the development 'shoulder' peak hours (7am-8am and 6pm-7pm), network peak hours (8am-9am and 5pm-6pm), the weekday 12-hour period (7am-7pm), average daily 24-hour period and the Saturday lunchtime period (12pm-1pm). Total vehicles and Heavy Goods Vehicles (HGVs) have been examined separately.

3.5.9 Following the above, Future Baseline traffic using the B1121 Main Road (via Benhall Bridge) has been isolated and initially traced across the remainder of the highway network based on the existing turning proportions of vehicles at inter-connecting junctions across the network, starting with the A12 / B1121 (South) junction (S-RJ2) to the west of the bridge and the B1121 Main Road / B1121 Church Hill junction (S-RJ6) to the east. These vehicles have been routed to / from Saxmundham and the study area extents, to identify the likely origins and destinations of vehicles travelling along the B1121 Main Road (via Benhall Bridge). The following points of origin / destination are covered within the spreadsheet model, in order of those which are more likely to result in trips along the B1121 Main Road (via Benhall Bridge):

- A12 south of the A1094 (south of the study area) – around 36% of daily traffic flows;

- B1119 east of the B1121 Main Road (e.g. within Saxmundham or to/ from Leiston) – around 18% of daily traffic flows;
- B1121 Main Road north of the B1119 (e.g. within Saxmundham or to/ from Kelsale) – around 16% of daily traffic flows;
- A12 north of the B1122 Leiston Road (north of the study area) – around 9% of daily traffic flows;
- B1069 Snape Road north of the A1094 (e.g. to/ from Coldfair Green, Aldringham or Thorpeness) – around 7% of daily traffic flows;
- B1119 west of the B1121 Main Road (within Saxmundham) – around 6% of daily traffic flows;
- B1069 Church Road south of A1094 (e.g. to/ from Snape) – around 3% of daily traffic flows;
- A1094 to the east of B1069 Snape Road (e.g. to/ from Aldeburgh) – around 2% of daily traffic flows;
- B1122 east of the A12 (e.g. to/ from Theberton) – around 1% of daily traffic flows;
- B1119 to the west of the A12 (e.g. to/ from Rendham) – less than 1% of daily traffic flows; and
- Grove Road (e.g. to/ from Friston or Knodishall) – less than 1% of daily traffic flows.

3.5.10 Following the above exercise, each of the points of origin / destination have been examined in turn to identify which journeys would logically be made via Benhall Bridge, to allow a more accurate trip distribution to be derived (refining the original distribution which was based on existing turning proportions at junctions). For example, the majority of trips travelling to / from the A12 to the south of the A1094 (representing around 36% of daily trips using Benhall Bridge) would logically travel via Benhall Bridge if travelling to / from Saxmundham or the B1119 to the east of the B1121 Main Road. An overall trip distribution has then been derived for traffic using Benhall Bridge, by combining all trips associated with each point of origin (travelling towards the bridge) and destination (travelling away from the bridge). Traffic flow diagrams showing the Future Baseline traffic flows associated with just Benhall Bridge and the estimated existing distribution of these trips across the wider network, for each of the time periods, are presented in **Application Document 9.76.5.11 Change Request Appendix K: Traffic Flow Diagrams** submitted at Deadline 1A. This forms the starting point for the traffic re-distribution exercise following the proposed temporary closure of Benhall Bridge. For reference, the overall 2028 Future Baseline traffic flows across the highway network are contained within **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**.

3.5.11 The Future Baseline traffic flows associated with Benhall Bridge have been redistributed across the highway network to identify the forecast changes across the network following the proposed temporary road closure(s). The same points of origin / destination have been adopted, and the most logical alternative routes which would be used to bypass Benhall Bridge have been identified, with limitations applied to HGVs to avoid less suitable routes where appropriate e.g. roads which are signed as being unsuitable for larger vehicles. Again, this exercise has been carried out for each point of origin / destination in turn, to allow all traffic flows to be re-traced across the network. Traffic flow diagrams showing the redistributed traffic flows associated with the proposed temporary road closure(s) and their distribution across the wider network, and

subsequently the net change in traffic flows across the network following the proposed road closure(s), for each of the time periods, are presented in **Application Document 9.76.5.11 Change Request Appendix K: Traffic Flow Diagrams** submitted at Deadline 1A.

3.5.12

In terms of the spreadsheet model, a total of 14 points of origin/destination have informed the model, representing locations where traffic enters or exits the network. Traffic flows may differ at these specific entry/exit points to those identified upstream or downstream, as these exclude through-traffic travelling to other parts of the study area. This is designed to clearly identify the traffic flows associated with Benhall Bridge, including traffic using it currently and then redistributed to avoid it. The assessment is nonetheless based on the total traffic flows across the network, based on the road link and road junction receptors previously assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The following additional road link receptors have also been examined where Future Baseline traffic flows are expected to change following the redistribution of traffic (including roads within Saxmundham), which have been assigned the next receptor references in sequence:

- S-RL14: B1121 Main Road, Benhall Bridge – added to provide a distinction from receptor S-RL5: B1121 Main Road (east of A12) which is based on traffic flows to the north of the B1121 Main Road/ B1121 Church Hill junction;
- S-RL15: B1121 Main Road, east of the northern A12 junction (S-RL15) – added given that Future Baseline traffic would be redistributed onto this route when Benhall Bridge is closed;
- S-RL16: B1121 Main Road, north of the B1119 Church Street (S-RL16) – added to identify further changes in traffic flows within Saxmundham following the closure of Benhall Bridge;
- S-RL17: B1119 Rendham Road, west of the B1121 Main Road (S-RL17) – added to identify further changes in traffic flows within Saxmundham following the closure of Benhall Bridge;
- S-RL18: Grove Road (S-RL18) – added to check whether the temporary closure of Benhall Bridge could result in any significant effects on this route; and
- S-RL19: Sternfield Road (S-RL19) – added to check whether the temporary closure of Benhall Bridge could result in any significant effects on this route.

3.5.13

The following assumptions have been made with respect to the redistribution exercise:

- All traffic using Benhall Bridge has been redistributed to provide a robust approach (despite local access being retained) i.e. traffic flows have not been reduced to consider a potential reduction in vehicle activity following the road closure(s) due to people choosing to travel less or to travel via alternative modes. Therefore, a “worst case assessment” has been adopted.
- The redistribution exercise extends to the study area extents and it has been assumed that there would be no wider redistribution of traffic beyond this, with no or very limited change in traffic on the A12 to the south of the A1094, the A12 to the north of the B1122 Leiston Road, the A1094 to the east of the B1069 Snape Road and the B1122 Leiston Road.
- Traffic using Benhall Bridge has been redistributed onto various alternative routes, including the following in order of those which are expected to be most utilised:

- The B1121 Main Road to the north of Saxmundham via the northern junction with the A12, as an alternative route to the southern B1121 Main Road junction with the A12, for traffic travelling to/from Kelsale or the northern part of Saxmundham;
- The A1094 between the A12 and the B1121 Aldeburgh Road junction (including some traffic via Sternfield Road), as an alternative route to the B1121 Main Road and B1121 Church Hill e.g. for traffic travelling to/from Benhall, Sternfield or Friston;
- The B1119 within the western part of Saxmundham via the junction with the A12, as an alternative route to the B1121 Main Road to the south of Saxmundham e.g. for traffic travelling to/from Saxmundham or Leiston (note this excludes HGVs which have not been redistributed via this junction); and
- Other various local routes depending on the origin and destination of trips, such as via the B1122 Leiston Road for trips travelling between the A12 to the north and Aldringham. These routes account for a very small proportion of overall trips as the majority of this traffic would not have been expected to use Benhall Bridge in the first place.

3.5.14 A summary of the results for the 24-hour daily scenario is presented in Table 3.9, with the results for all other time periods held in **Application Document 9.76.5.12 Change Request Appendix L Tabulated Traffic Flows** submitted at Deadline 1A. Levels of magnitude have been assigned based on the same criteria adopted for the assessment of Driver Delay (informed by the 2023 Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement) as set out within Table 7.10 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, to allow potential impacts to be identified. This criteria is as follows:

- Negligible: A change in total traffic flow of less than 30 vehicle trips per hour (for all one-hour time periods assessed) or a change in both total and HGV traffic of less than 30%;
- Small: A change in either (or both) total traffic flow and HGV traffic of between 30% and 59%;
- Medium: A change in either (or both) total traffic flow and HGV traffic of between 60% and 89%; and
- Large: A change in either (or both) total traffic flow and HGV traffic of 90% and above.

Table 3.9 Future Baseline (2028) – Forecast Traffic Redistribution following B1121 Main Road Closure (24hr Daily)

Receptor		Future Baseline		Redistributed Traffic		Difference		% Change		Magnitude
Ref	Location	HGVs	Total	HGVs	Total	HGVs	Total	HGVs	Total	
S-RL1	A12 (south of A1094)	825	14,759	825	14,759	0	0	0.0%	0.0%	Negligible
S-RL2	A12 (between A1094 & B1121 Main Rd south junction)	732	10,947	694	10,584	-38	-363	-5.2%	-3.3%	Negligible
S-RL3	A12 (between B1121 Main Road junctions)	677	9,124	694	10,170	17	1,046	2.5%	11.5%	Negligible
S-RL4	A12 (north of B1121 Main Road northern junction)	651	10,171	648	10,115	-3	-56	-0.5%	-0.6%	Negligible
S-RL5	B1121 Main Road (east of A12, south of Saxmundham)	108	4,247	61	2,320	-47	-1,927	-43.5%	-45.4%	Small (Beneficial)
S-RL6	B1121 Main Road (south of B1119 Church Street)	87	4,126	40	2,199	-47	-1,927	-54.0%	-46.7%	Small (Beneficial)
S-RL7	B1119 Church Street (east of B1121 Main Road)	71	2,979	70	2,948	-1	-31	-1.4%	-1.0%	Negligible
S-RL8	B1121 Aldeburgh Road (between A1094 and B1121 Saxmundham Road)	27	1,080	38	631	11	-449	40.7%	-41.6%	Small (Beneficial)
S-RL9	B1121 Saxmundham Road (north of Grove Road)	18	891	26	356	8	-535	44.4%	-60.0%	Medium (Beneficial)

Receptor		Future Baseline		Redistributed Traffic		Difference		% Change		Magnitude
S-RL10	A1094 (between A12 and B1069 Snape Road)	200	7,062	241	7,571	41	509	20.5%	7.2%	Negligible
S-RL11	A1094 Aldeburgh Road (between B1069 Snape Road and B1122 Leiston Road)	95	4,034	95	4,034	0	0	0.0%	0.0%	Negligible
S-RL12	B1069 Snape Road (between A1094 Aldeburgh Road and Aldringham Lane)	173	5,997	171	5,940	-2	-57	-1.2%	-1.0%	Negligible
S-RL13	B1122 Leiston Road (between A1094 Aldeburgh Road and Aldringham Lane)	105	2,642	105	2,642	0	0	0.0%	0.0%	Negligible
S-RL14 (new)	B1121 Main Road (Benhall Bridge)	94	2,599	0	0	-94	-2,599	-100.0%	-100.0%	N/A (road closed)
S-RL15 (new)	B1121 Main Road North (east of A12, north of Saxmundham)	94	2,091	140	3,030	46	939	48.9%	44.9%	Small (Adverse)
S-RL16 (new)	B1121 Main Road (north of B1119 Church Street)	70	3,870	67	3,298	-3	-572	-4.3%	-14.8%	Negligible
S-RL17 (new)	B1119 Rendham Road (west of B1121 Main Road)	28	3,294	28	3,669	0	375	0.0%	11.4%	Negligible
S-RL18 (new)	Grove Road	4	192	5	222	1	30	25.0%	15.6%	Negligible
S-RL19 (new)	Sternfield Road	17	1,318	21	1,455	4	137	23.5%	10.4%	Negligible

Receptor		Future Baseline		Redistributed Traffic		Difference		% Change		Magnitude
S-RJ1	A12/A1094 Junction	887	16,152	887	16,156	0	4	0.0%	0.0%	Negligible
S-RJ2	A12/B1121 (South) Junction	750	11,428	688	10,534	-62	-894	-8.3%	-7.8%	Negligible
S-RJ3	A12/B1119 Junction	695	11,370	712	12,475	17	1,105	2.4%	9.7%	Negligible
S-RJ4	A12/B1121 (North) Junction	674	10,433	704	10,979	30	546	4.5%	5.2%	Negligible
S-RJ5	A12/B1122 Junction	774	12,903	774	12,895	0	-8	0.0%	-0.1%	Negligible
S-RJ6	B1121 Main Road/B1121 Church Hill Junction	104	4,482	44	1,956	-60	-2,526	-57.7%	-56.4%	Small (Beneficial)
S-RJ7	B1121 Main Road/B1119 Church Hill Signalised Junction	149	8,817	123	7,740	-26	-1,077	-17.4%	-12.2%	Negligible
S-RJ8	B1121 Saxmundham Road/Grove Road/Mill Road Junction	20	1,028	30	552	10	-476	50.0%	-46.3%	Small (Beneficial)
S-RJ9	A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction	222	7,953	247	7,955	25	2	11.3%	0.0%	Negligible
S-RJ10	A1094 Aldeburgh Road/B1069 Snape Road Junction	260	9,832	258	9,776	-2	-56	-0.8%	-0.6%	Negligible
S-RJ11	A1094/B1122 Leiston Road/Church Farm Road Roundabout	150	6,157	150	6,157	0	0	0.0%	0.0%	Negligible
S-RJ12	B1122 Aldeburgh Road/B1353 Aldringham Lane Junction	144	5,875	144	5,875	0	0	0.0%	0.0%	Negligible

Receptor		Future Baseline		Redistributed Traffic		Difference		% Change		Magnitude
S-RJ13	B1069 Leiston Road/B1353 Aldringham Lane Junction	135	5,139	134	5,115	-1	-24	-0.7%	-0.5%	Negligible
S-RJ14	A1094/Sternfield Road/Church Road Junction	278	9,410	320	9,919	42	509	15.1%	5.4%	Negligible

- 3.5.15 The results in Table 3.9 indicate that a small adverse magnitude of change could be expected for the B1121 Main Road North (east of A12, to the north of Saxmundham) due to the redistribution of traffic onto this route from the B1121 Main Road (Benhall Bridge) to the south of Saxmundham, which is also the case for all assessed time periods. Otherwise, either a negligible magnitude of change or a beneficial magnitude of change (due to a reduction in traffic) is forecast across the rest of the network. These results are based on the redistribution of Future Baseline traffic only and does not consider increases associated with proposed construction traffic (which is reviewed below). However, the B1121 Main Road North (east of A12, to the north of Saxmundham) will not be used by construction traffic which could otherwise result in a greater magnitude of change.
- 3.5.16 The B1121 Main Road North (east of A12, to the north of Saxmundham) is a new receptor which has not previously been assessed, given this route will not be used by construction traffic associated with the Proposed Project. Whilst the proposed temporary road closure(s) could result in the potential for significant effects to arise on the B1121 Main Road North (east of A12, to the north of Saxmundham) as a result of redistributed Future Baseline traffic from the B1121 Main Road (Benhall Bridge) to the south of Saxmundham, the duration of this impact would be short-term and limited to either 45 days (Option 1) or 28 days (Option 2). Therefore, it is considered that any effects are minor and not significant, particularly as only a small adverse magnitude of change has been identified and this route would not be used by construction vehicles.
- 3.5.17 The next stage of this additional assessment is to consider the potential impacts associated with the redistribution of Future Baseline traffic in combination with peak construction traffic for the Proposed Project. This provides a robust approach given that construction traffic associated with the Benhall Bridge works (both Options) would be well within the peak levels previously assessed. This aspect of the assessment is limited to those receptors which are expected to be used by construction traffic and are also expected to experience an increase in Future Baseline traffic following the temporary road closure(s). This relates to the following receptors:
- S-RL3: A12 (between B1121 Main Road junctions);
 - S-RL10: A1094 (between A12 and B1069 Snape Road);
 - S-RJ3: A12/B1119 Junction;
 - S-RJ4: A12/B1121 (North) Junction;
 - S-RJ9: A1094 Aldeburgh Road / B1121 Aldeburgh Road Junction; and
 - S-RJ14: A1094/Sternfield Road / Church Road Junction.
- 3.5.18 As identified in Table 3.9, negligible increases in Future Baseline traffic have been identified for the above receptors following the proposed temporary road closure(s), for all time periods. Nonetheless, the magnitude of change associated with the forecast increases in peak construction traffic levels for these receptors as previously reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** has initially been increased by a single category to reflect the further increase in traffic as a result of redistributed traffic. This provides a robust approach given that some of the modest increases in Future Baseline traffic flows may not increase the overall magnitude of change that was previously identified for the above receptors. Where any potentially significant effects have subsequently been identified following the above exercise, then the actual magnitude of change resulting from the combined increase of Future Baseline traffic and peak construction traffic has then been identified

and adopted as part of this additional assessment, to avoid overestimating potential effects.

- 3.5.19 A summary of the results is presented in Table 3.10, which reports the potential significance of effect for each receptor and assessment type, following the above. The full output with details of sensitivity levels and magnitude of change is provided in **Application Document 9.76.5.13 Change Request Appendix M: Additional Assessment of Proposed Temporary Road Closure** submitted at Deadline 1A.

Table 3.10 Additional Traffic and Transport Assessment – Peak Construction Traffic combined within Forecast Traffic Redistribution following Benhall Bridge Closure

Receptor	Significance of Effect (by Assessment)					
	Severance and Pedestrian Delay	Non-Motorised User Amenity	Fear and Intimidation	Driver Delay	Road Safety	Large/Hazardous Loads
S-RL3: A12 (between B1121 Main Road junctions)	Negligible	Negligible	Negligible	Negligible	Minor	Negligible
S-RL10: A1094 (between A12 and B1069 Snape Road)	Minor*	Minor	Minor	Minor*	Minor	Negligible
S-RJ3: A12/B1119 Junction	Negligible	Negligible	Negligible	Minor	Minor	Minor
S-RJ4: A12/B1121 (North) Junction	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
S-RJ9: A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction	Negligible	Negligible	Negligible	Negligible	Negligible	Negligible
S-RJ14: A1094/Sternfield Road/Church Road Junction	Minor	Negligible	Negligible	Minor	Minor	Negligible

**magnitude of change (and potential significance of effect) remains unchanged from the original assessment when combining redistributed Future Baseline traffic with peak construction traffic*

- 3.5.20 The results in Table 3.10 above indicate that the likely impact of the temporary road closure(s) and the redistribution of Future Baseline traffic when combined with peak construction traffic associated with the Proposed Project would not be significant for the receptors and assessment criteria outlined. The additional assessment is considered to be robust, given that the proposed works at Benhall Bridge (and the associated road closure(s)) may not overlap with the peak construction phase of the Proposed Project, particularly for Option 2 which would be carried out early in the construction phase.

Furthermore, construction traffic levels would be lower than peak construction levels previously assessed, as construction vehicles would not be able to use the main site access on B1121 Main Road (bellmouth S-BM09) when the bridge is being repaired (Option 2) or when the mini-bridge is being installed or removed (Option 1). Future Baseline traffic levels may also be lower when Benhall Bridge is closed (which has not been considered) and the mini-bridge option (Option 1) is expected to only be implemented over weekends (e.g. three days from Friday to Monday), to reduce potential impacts during the week. Lastly, the temporary road closure(s) would only be in place for a short-term limited overall duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts, and local access would be retained meaning that not all Future Baseline traffic flows would be redistributed.

- 3.5.21 Notwithstanding the above, further details of the proposals and how these would be carried out and managed have been set out within, and will be secured through, an updated version of **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A.

Pedestrians

- 3.5.22 In addition to the temporary road closure(s), the footways on both sides of Benhall Bridge will be temporarily closed during the proposed works at Benhall Bridge (both options), along with the northern end of PRow E-137/026/0 to maintain public safety by keeping them away from the proposed works at Benhall Bridge. Otherwise, the existing footways on the B1121 Main Road to the east and west of Benhall Bridge will remain open throughout the works.
- 3.5.23 The footway on the south-eastern side of Benhall Bridge currently provides a connection between PRow E-137/026/0 to the east and the access to Whitearch Park Residential Park Homes to the west. The footway on the north-western side of Benhall Bridge routes towards the A12/B1121 Main Road junction to the west. The temporary footway closures on Benhall Bridge would only be in place for a limited overall duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts. Nonetheless, these footway/ footpath closures have the potential to result in a significant adverse effect with respect to severance and pedestrian delay for users travelling to / from Whitearch Park Residential Park Homes.
- 3.5.24 In view of the above, a shuttle/taxi service could be made available as additional embedded mitigation, so that residents who do not have access to a vehicle can continue to travel between Whitearch Park Residential Park Homes and nearby areas (e.g. Benhall and Saxmundham) when the proposed temporary footway/footpath closures are in place on Benhall Bridge (see commitment TT11 in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request)** submitted at Deadline 1A) . The proposals are not expected to result in any likely significant effects with respect to severance and pedestrian delay with this mitigation in place, which will be secured as part of the updated versions of **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A and **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A.

Bus Passengers

- 3.5.25 The B1121 Main Road currently accommodates two pairs of bus stops between Benhall Bridge (southwest) and B1121 Church Hill (northeast), which are served by bus route 521. This bus route runs between Beccles and Aldeburgh via Saxmundham, with a frequency of approximately one service per hour in each direction during the week. These four bus stops would be temporarily suspended during any temporary road closures and bus route 521 would instead continue its route between the B1121 Main Road to the north and the B1121 Church Hill to the east, via the B1121 Main Road / B1121 Church Hill junction. Therefore, the bus service would continue to operate and no diversion would be required, other than avoiding the temporarily suspended bus stops on the section of temporarily closed road. The bus service would continue to be accessible via the existing bus stops on the B1121 Church Hill which are located within 50m of the bus stops to be suspended on the B1121 Main Road. The additional walking distance to the B1121 Church Hill bus stops for residents living within the centre of Benhall would be around 300m (via School Lane and the footways on the eastern side of the B1121 Main Road and on both sides of the B1121 Church Hill), equating to an average walk time of around four minutes.
- 3.5.26 Therefore, it is not considered that the temporary suspension of these bus stops would have any likely significant effects on bus stop users, given that the bus route would continue to operate and be accessible via existing bus stops nearby. For example, residents within Benhall could access the bus stops on the B1121 Church Hill via School Lane and the footways on the eastern side of the B1121 Main Road and on both sides of the B1121 Church Hill in the vicinity of the B1121 Main Road/ B1121 Church Hill junction, within a reasonable additional walking distance.

Railway Users

- 3.5.27 Option 2 may require several possessions of the railway (underneath Benhall Bridge) which would be subject to agreement with Network Rail. These would be determined following a survey of the bridge and an assessment of any repair work necessary, to be reviewed and agreed between the asset owner (SCC), National Grid and Network Rail. Any possessions would be short-term and scheduled to minimise impacts on railway services and railway users e.g. weekend possessions, holiday period possessions or night-time possessions. However, the number and duration of these possessions would ultimately be dictated by Network Rail and the scope of any repair work necessary.
- 3.5.28 In view of the above, it is not possible to assess the potential implications of the repair works (Option 2) on railway users, given that the requirements for any railway possessions, should these be required, are currently unknown and would be subject to agreement with Network Rail. However, should any railway possessions be required, then additional mitigation would be secured through the draft DCO where necessary, including as part of the final version of **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A, to avoid the potential for significant effects on railway users. This could include minimising the number and duration of any possessions, timing these to occur overnight or at the weekend and liaising with Network Rail to provide rail replacement services should any rail passenger services be affected. Alternatively, the proposed mini-bridge (Option 1) could be taken forward instead, as this would avoid any possessions of the railway and would not therefore be expected to have any impact on railway services/users.

Traffic and Transport – Potential Impacts of Temporary Public Rights of Way Closure

- 3.5.29 As identified in Table 3.7, both options will require the temporary closure of the northern end of PRow E-137/026/0 where this joins the south-eastern footway on Benhall Bridge, when any temporary road closures are in place. This is a new receptor that was not previously assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as there were not previously expected to be any interactions with the Proposed Project. This section therefore reviews whether the proposed change could result in any likely significant effects on this new receptor and any additional mitigation that may be required to avoid these potential significant effects and where this is documented. **Application Document 6.4.2.7.4 Walking and Cycling Routes (including PRows and Bridleways) – Suffolk Onshore Scheme (Version 2, change request)** has also been updated for Deadline 1A to include this PRow and is included in the Figures at the end of this Addendum.
- 3.5.30 It should be noted that both PRow E-137/034/0 and PRow E-137/024/0, which also form connections with the B1121 Main Road between the A12 to the west and the B1121 Church Hill to the east, would not be affected by the proposed change and would remain open throughout the works. These PRow have therefore not been reviewed any further (including as part of the updated **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A), given these would not be affected by the proposed change.
- 3.5.31 The study area has previously been reported within Section 7.6 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. As set out above, the revised Order Limits now include PRow E-137/026/0 which is a Public Footpath and has been assigned the next receptor reference in sequence (S-P18).
- 3.5.32 The baseline conditions of the active travel network including PRow have previously been reported within Section 7.7 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. Following on from this, PRow E-137/026/0 is a Public Footpath which runs between the B1121 Main Road (immediately northeast of Benhall Bridge) to the north, and Watering Lane (via PRow E-491/003/0) to the south. PRow E-137/026/0 runs for a distance of circa 1.3 km via agricultural fields, Mill Lane and Festival Close within Benhall, Aldecar Lane, a small area of woodland and open fields to the south. It provides a connection between the B1121 Main Road (north) and both PRow E-491/003/0 and PRow E-137/027/0 (south).
- 3.5.33 The section of PRow E-137/026/0 which passes within the vicinity of Benhall Bridge (and the revised Order Limits associated with the proposed change) comprises the western part of the route between B1121 Main Road to the west and Mill Lane and Festival Close within Benhall to the east. This section of the PRow is a narrow route which passes through/ alongside agricultural fields.
- 3.5.34 The criteria for assigning receptor sensitivity levels to the various assessments of PRow are outlined within Table 7.5 and Table 7.9 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The following sensitivity levels have been assigned to the section of PRow E-137/026/0 (S-P18) which passes within the vicinity of Benhall Bridge (and the revised Order Limits):
- Severance, Pedestrian Delay, Non-Motorised User Amenity, Fear and Intimidation: **Negligible** – the section of PRow comprises a pedestrian route which passes through agricultural fields and does not run alongside a highway.

- **PRoW Diversions and Closures: Low** – the section of PRoW appears to be a narrow route of mixed quality which primarily provides a connection between Benhall and the narrow footway on the southern side of Benhall Bridge which accesses Whitearch Park Residential Park Homes. This PRoW is therefore expected to be lightly used and an alternative route which links Benhall with the B1121 Main Road further to the northeast (including nearby bus stops) is available via Mill Lane and Forge Close within Benhall, although it is acknowledged that footway provision is limited.

3.5.35 Details of the proposed embedded mitigation are set out within Section 7.8 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The following embedded mitigation measure applies to PRoW E-137/026/0 (S-P18) which passes through the revised Order Limits:

- **TT03** – All designated PRoW will be identified, and any potential temporary and / or permanent diversions applied for / detailed in the DCO. All designated PRoW crossing the working area will be managed with access only closed for short periods while construction activities occur. Any required diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion (for temporary diversions) and a contact number for any concerns. This is outlined in the Outline Public Rights of Way Management Plans.

3.5.36 In view of the above, **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** has been submitted at Deadline 1A to include PRoW E-137/026/0 (S-P18) and the measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on PRoW E-137/026/0 during all phases of the Proposed Project. This comprises the temporary closure of the northern end of the PRoW when any temporary road closures are in place, at the location where this currently joins the south-eastern footway on Benhall Bridge (which would also be closed), to maintain public safety by keeping them away from the proposed works at Benhall Bridge. The remainder of the PRoW would remain open and signs would be provided at various locations along the PRoW (at intersection points with other routes) to inform users that the B1121 Main Road cannot be accessed via PRoW E-137/026/0 when works are being carried out at Benhall Bridge. A shuttle/ taxi service would be made available to those wishing to travel between Whitearch Park Residential Park Homes and nearby areas (e.g. Benhall and Saxmundham) during the periods of any temporary closures i.e. for those who do not have access to a vehicle. There would be no haul road crossing points or interactions with construction vehicles along the PRoW, throughout the construction period. There would be no interactions with or impacts to PRoW E-137/026/0 during the operational phase, as a result of the Proposed Project.

3.5.37 The potential duration of the temporary PRoW closure (northern end only) varies between the Options as follows:

- **Option 1:** Several short-term temporary closures of the northern end of the PRoW, for a period of three days each (total duration of 45 days). The remainder of the PRoW would remain open and accessible throughout the closure periods.
- **Option 2:** A single short-term temporary closure of the northern end of the PRoW, for a period of four weeks (28 days). The remainder of the PRoW would remain open and accessible throughout this period.

3.5.38 The criteria for assigning the magnitude of change to the various assessments of PRoW are outlined within Paragraphs 7.4.41 to 7.4.43 and Table 7.12 of **Application**

Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. The following magnitudes of change have been assigned to PRoW E-137/026/0 (S-P18) as a result of the two options identified above:

- Severance and Pedestrian Delay: **Small** (temporary, short-term localised closure(s) required to the northern end of the PRoW only to maintain public safety by keeping them away from the proposed works at Benhall Bridge, with the remainder of the PRoW to remain open and no change in journey length);
- Non-Motorised User Amenity and Fear and Intimidation: **Negligible** (no interactions with the proposed haul road or construction vehicles); and
- PRoW Diversions and Closures: **Small** (temporary, short-term localised closure(s) required to the northern end of the PRoW only to maintain public safety by keeping them away from the proposed works at Benhall Bridge, with the remainder of the PRoW to remain open and no change in journey length).

3.5.39 The significance matrix for identifying significance of effects is set out within Table 7.13 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The assessments of PRoW E-137/026/0 (S-P18) are set out below based on the above and the embedded mitigation set out within the updated version of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A:

- Severance: **Negligible** (negligible sensitivity and small magnitude of change);
- Pedestrian Delay: **Negligible** (negligible sensitivity and small magnitude of change);
- Non-Motorised User Amenity: **Negligible** (negligible sensitivity and negligible magnitude of change);
- Fear and Intimidation: **Negligible** (negligible sensitivity and negligible magnitude of change); and
- PRoW Diversions and Closures: **Negligible** (low sensitivity and small magnitude of change).

3.5.40 As shown above, the likely impact of the Proposed Project on PRoW E-137/026/0 (S-P18) based on both options for all assessments, is assessed as not significant. No further mitigation is necessary for Traffic and Transport in addition to the embedded measures and control and management measures set out within Section 7.8 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and the updated version of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** submitted at Deadline 1A.

Socio-economics, Recreation and Tourism – Potential Impacts of Temporary Public Rights of Way Diversion

3.5.41 As identified in Table 3.7, Option 1 and Option 2, will require the temporary closure of Footpath 137/026/0. This is a new receptor that was not previously assessed within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**, as this did not previously fall within the study area. This section therefore reviews whether the proposed change could result in potential significant effects on this new receptor and any additional mitigation that may be required to avoid these potential significant effects and where this is documented.

- 3.5.42 The approach and methodology for assessing PRow and recreational routes has been set out in Section 10.4 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. Table 10.7 identifies the sensitivity criteria that have been used to inform the assessment of PRow, accounting for extent of usage, type of user, quality of user experience, quality of the route, purpose of usage and potential for substitution. Table 10.10 identifies the magnitude of impact criteria which have been used to assess the impacts on PRow, considering change in routes' accessibility, ability to serve its purpose, and journey length.
- 3.5.43 The study area has previously been reported within Section 10.6 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. As set out above, the revised Order Limits now include Footpath 137/026/0.
- 3.5.44 The baseline conditions of PRow and recreational routes has previously been reported within Section 10.7 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. Following on from this, Footpath 137/026/0 intercepts the Order Limits at the B1121, and runs for a distance of circa 1.3 km via agricultural fields, Mill Lane and Festival Close within Benhall Green, as well as via woodland, Aldecar Lane and open fields to the south. It provides a connection between the B1121 Main Road (north) and both Footpath 491/003/0 and Footpath 137/027/0 (south). As a result, the footpath is likely used for both access and recreation purposes.
- 3.5.45 The assessment of PRow and recreational routes has previously been reported within Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]**. Following on from this, a short-term temporary closure to Footpath 137/026/0 (northern end only) would be required when any temporary road closures are in place. This would be required at the location where this currently joins the southeastern footway on Benhall Bridge (which would also be closed), to maintain public safety by keeping them away from the proposed works at Benhall Bridge. The remainder of the PRow would remain open and signs would be provided at various locations along the PRow (at intersection points with other routes) to inform users that the B1121 Main Road cannot be accessed via PRow E-137/026/0 when works are being carried out at Benhall Bridge. This temporary closure would be required for a total duration of 45 days (Option 1) or 28 days (Option 2) during construction.
- 3.5.46 Footpath 137/026/0 is assessed to have a medium sensitivity as a footpath that connects to the local PRow network. As a route used for recreation, it has potential comparable alternative routes available in the local vicinity. Footpath 137/026/0 is also potentially used for access purposes, as a footpath connecting residential properties. The magnitude of impact of the Proposed Project on Footpath 137/026/0 is assessed to be small given the duration of the temporary closure. Overall, this results in a temporary minor adverse effect which is not considered significant.

3.6 Change 5: Increase in area for maintenance of a new hedge south of B1119

- 3.6.1 Table 3.11 provides a review of whether Change 5 would result in any new or different likely significant environmental effects compared to those reported within the ES previously submitted, including updates to chapters following submission of the DCO application.

Table 3.11 Review of ES conclusions as a result of Change 5

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-048	6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual	The proposed change would not result in any new or different likely significant effects on landscape character or visual amenity. The proposed hedgerow and hedgerow tree planting in this location is already considered in the ES and is essential mitigation to reduce effects on landscape character and visual amenity. The proposed widening of the Order Limits would enable a maintenance strip to be accommodated between the existing drainage, water main and new hedge which would allow the maintenance of all these features in accordance with the measures set out in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request) submitted at Deadline 1A.
REP1-047	6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity	The proposed change expands the Order Limits on the south side of the B1119 east of Saxmundham to permit access to the proposed hedgerow which is already included in the DCO and considered in the ES. It does not impact on any new or different ecological receptors or introduce any new or different likely significant effects. Therefore, the overall assessment within this ES chapter remains the same, and no further mitigation is necessary.
APP-050	6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage	The proposed change expands the Order Limits but does not introduce any new or different heritage receptors to the assessment and will have no new or different likely significant effects on heritage assets. The heritage assessment and conclusions in the ES chapter remain the same, and further mitigation measures are not necessary.

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
APP-051	6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment	There would be no new or different likely significant environmental effects on the water environment as a result of the proposed change, when compared to the design assessed within the ES. However, the proposed change would help to facilitate maintenance of a local land drainage feature, which contributes to managing flood risk to the adjacent road, which is of local benefit.
APP-052	6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology	Given the nature of the proposed change, there would be no new or different likely significant environmental effects on geology and hydrogeology as a result of the proposed change when compared to the design assessed within the ES.
PDA-019	6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils	The proposed change would result in some additional agricultural land being required for planting and drainage on the edge of the fields. The land has been modelled as being Predictive Grade 3b and as such is unlikely to comprise BMV land. Therefore, there would not be any new or different likely significant effects on agriculture and soils as a result of the proposed change when compared to the assessment presented within the ES chapter.
APP-054	6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport	The proposed change is not expected to result in any likely significant effects with respect to traffic and transport. In terms of the eastern location, the area to the south of the B1119 currently accommodates PRoW E-491/010/0 (Bridleway) which runs north-south between the B1119 and B1121. This PRoW would still remain open and accessible to PRoW users, with the introduction of this proposed change. In terms of the western location, the area to the south of the B1119 would also still accommodate a proposed temporary PRoW diversion as shown on Application Document 2.7 (B) Access, Rights of Way and Public Rights of Navigation Plans (Version 2, change request) submitted at Deadline 1A and as reported in Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request) submitted at Deadline 1A. This temporary PRoW diversion is required to mitigate the temporary closure of PRoW E-491/006/0 (Public Footpath) due to a proposed construction compound, to avoid any likely significant effects on this PRoW, as reported in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] . The revised Order Limits would accommodate both the proposed hedge and the proposed temporary PRoW diversion in this area, to avoid any potential significant effects on PRoW E-491/006/0. Therefore, the unchanged assessment within the ES remains unchanged

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		and no new or different likely significant effects are concluded. No further mitigation is considered to be necessary.
APP-055	6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality	Given the minor nature of the proposed change, there would be no new or different likely significant effects on air quality as a result of the proposed change, when compared to the design assessed within the ES. Therefore, the overall assessment within the ES remains unchanged, and no further mitigation is considered to be necessary.
AS-109	6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration	Given the minor nature of the proposed change, there would be no new or different likely significant effects from a noise and vibration perspective. The works in this area associated with this proposed change are not expected to generate levels of noise or vibration that would be considered significant at nearby noise sensitive receptors, particularly with the implementation of best practicable means to reduce effects. The conclusions of the ES chapter remain unchanged.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism	<p>There would be no new or different likely significant environmental effects on socioeconomics, recreation and tourism as a result of the proposed change when compared to the design assessed within the ES. The eastern area of the proposed change accommodates Bridleway 491/010/0. This PRoW would still remain open and accessible to PRoW users, and the proposed hedge within the revised Order Limits will not obstruct the existing PRoW. The western area of the proposed change would accommodate a proposed temporary PRoW diversion which is required to mitigate the temporary closure of Footpath 491/006/0. The revised Order Limits would still accommodate both the proposed hedge and the proposed temporary PRoW diversion in this area, to avoid any potential significant effects on PRoW E-491/006/0. Therefore, the assessment of PRoW and recreational routes within the ES remains unchanged, and no further mitigation is considered to be necessary.</p> <p>The revised Order Limits include additional land from the Redhouse Christmas Tree Farm in Sternfield. Further land has been incorporated to allow hedgerow and ditch maintenance to be carried out within their property rather than along the B1119. Any Christmas trees planted within the revised Order Limits will be removed as necessary to facilitate these maintenance activities. During the operational period, maintenance works are expected to be infrequent, occurring approximately once per quarter for the hedgerow and an annual inspection and clearance prior to winter for the ditch. Considering the limited extent of land required,</p>

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
		together with the minor scale and infrequent nature of the works at Redhouse Christmas Tree Farm, it is assessed that the business has sufficient capacity to absorb this impact without any likely significant adverse effect on its economic wellbeing. The works are therefore not anticipated to result in any new or different likely significant effects on the business compared to those set out in the submitted DCO application. As a result, the overall assessment within the ES remains unchanged, and no additional mitigation is considered necessary.
APP-058	6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing	<p>There is no change in terms of the conclusions from an air quality and noise perspective as reported above. As such, no change in health outcomes related to air pollution or noise disturbance are anticipated.</p> <p>The proposed change is not expected to affect the proposals with respect to access, given the revised Order Limits will accommodate both the proposed hedge and the proposed temporary PRoW diversion in this area, to avoid any potential significant effects on PRoW E-491/006/0. This safeguards opportunities for physical activity, recreation and social interaction that contribute to health and wellbeing. Therefore, the overall assessment within the ES remains unchanged, and no further mitigation is considered to be necessary.</p>
APP-059	6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects	Given there is no change in the conclusions presented in each of the topics above and there would be no change to the sources of intra-project effects, the proposed change does not alter the conclusions in terms of significant intra-project effects reported in this ES chapter.
APP-060	6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects	The proposed change does not alter the Proposed Project's interaction with other developments, therefore, the proposed change does not alter the conclusions in terms of significant inter-project effects reported in this ES chapter.
APP-085	6.2.5.1 Part 5 Combined Chapter 1 Climate Change	The proposed change is considered negligible from a climate change perspective, and this change will not alter the conclusions within the ES chapter.
APP-086	6.2.5.2 Part 5 Combined Chapter 2 Project-wide	Given there is no change in the conclusions presented in each of the topics in Table 3.1, 3.3, 3.5, 3.7 and 3.11, it is considered that, when combined, the proposed changes would not

Application Document Number	Relevant ES Chapter	Review of whether new or different likely significant environmental effects would arise as a result of the proposed change
	(Combined) Effects of the Proposed Project	result in any new or different likely significant Project-wide (combined) effects reported in this ES chapter.

3.6.2 Table 3.12 provides a review of whether Change 5 would change the findings reported in other environmental assessments included within Volume 6 of the DCO application.

Table 3.12 Review of other Volume 6 assessment conclusions as a result of Change 5

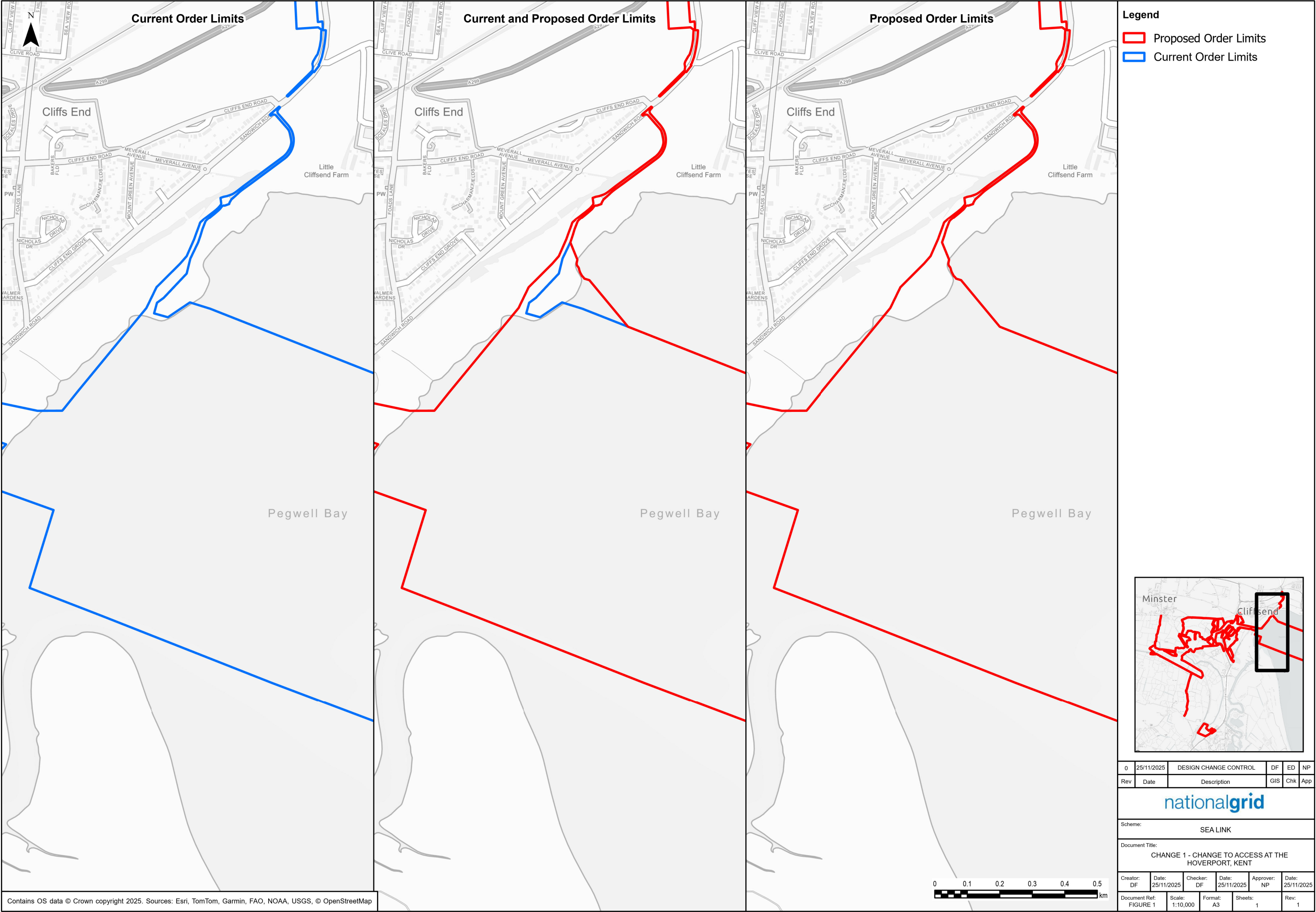
Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-289	6.5 Electric and Magnetic Field Compliance Report	Given the nature of Change 5, the conclusions of this report do not change.
REP1-071	6.6 (C) Habitats Regulations Assessment Report	Given the nature of the proposed change and the absence of impact pathways to European designated sites, the conclusions of the HRA do not change.
APP-291	6.7 Statement of Statutory Nuisance	As this report draws on information about impacts from the ES, and there are no new or different significant environmental effects reported in the ES as a result of this proposed change (see Table 3.11) it is concluded that there are no changes to the conclusions to the Statement of Statutory Nuisance.
APP-292	6.8 Flood Risk Assessment	The proposed change would facilitate maintenance of a local land drainage feature, which contributes to managing flood risk to the adjacent road, which is of local benefit. However, overall, there would be no new or different conclusions with regards to flood risk because of the nature and minor scale of the proposed change.

Application Document Number	Relevant DCO Application Document	Review of whether new or different conclusions would arise as a result of the proposed change
APP-293	6.9 Water Framework Directive Assessment	The proposed change is located within the existing Zone of Interest of the WFD Assessment. Therefore, it does not interact with any new surface, transitional or coastal WFD waterbodies that are not already screened in to the assessment reported in the WFD Assessment. There would be no notable changes to the Proposed Project activities compared to the existing application, therefore there would be no new or different effects on WFD waterbodies.
APP-294 and APP-295	6.10 Arboricultural Impact Assessment Part 1 of 2; 6.10 Arboricultural Impact Assessment Part 2 of 2	The proposed change would result in the additional loss of part of two Christmas tree plantation groups (W737S and W738S) where they are located within the revised Order Limits as shown on the Tree Protection Plan (see Application Document 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme submitted at Deadline 1A). As a forestry crop, the Christmas trees would typically be felled and replanted on a cyclical basis. The permanent loss of a small area of these low stature plantation groups will not result in a substantive arboricultural impact. The proposed hedgerow will incur within the existing established woodland group (W708S) to the east. Hedge installation and management works in this location will be undertaken with care to ensure tree roots and soil structure associated with the existing woodland are not negatively impacted. All access will be in keeping with the existing access arrangements as applied for the Christmas tree plantation. Hedge planting will be carried out by hand and new hedgerow plants will be sited to avoid important tree roots. This is secured through measure A20 in the updated Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request) submitted at Deadline 1A.
Updated document submitted at Deadline 1A – Application Document Number is to be confirmed	6.12 (C) Biodiversity Net Gain Feasibility Report.	The proposed change will result in a minor change to the BNG metric calculation as presented in the BNG Feasibility Report. However, it is a small change in the overall context of the Proposed Project's Order Limits and it is considered that this will not result in a significant change to the number of units required to achieve a 10% net gain. All changes will be captured in the detailed design BNG assessment.

4. Conclusion

- 4.1.1 In summary, the review confirms that none of the proposed changes introduce new or different likely significant environmental effects compared to those reported in the ES. Where additional surveys and/or assessments have been undertaken, these have informed the review and confirmed that impacts remain within the scope of the original EIA. Updates to mitigation measures have been incorporated as necessary into the **Application Document (B) 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request)** submitted at Deadline 1A (see new measures TT11, TT12, A19 and A20).
- 4.1.2 Other relevant Volume 7 control documents such as **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk (Version 2, change request)**, **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk (Version 2, change request)** and **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk (Version 2, change request)** have been updated and submitted at Deadline 1A.

Figures





Legend

- Proposed Order Limits
- Current Order Limits

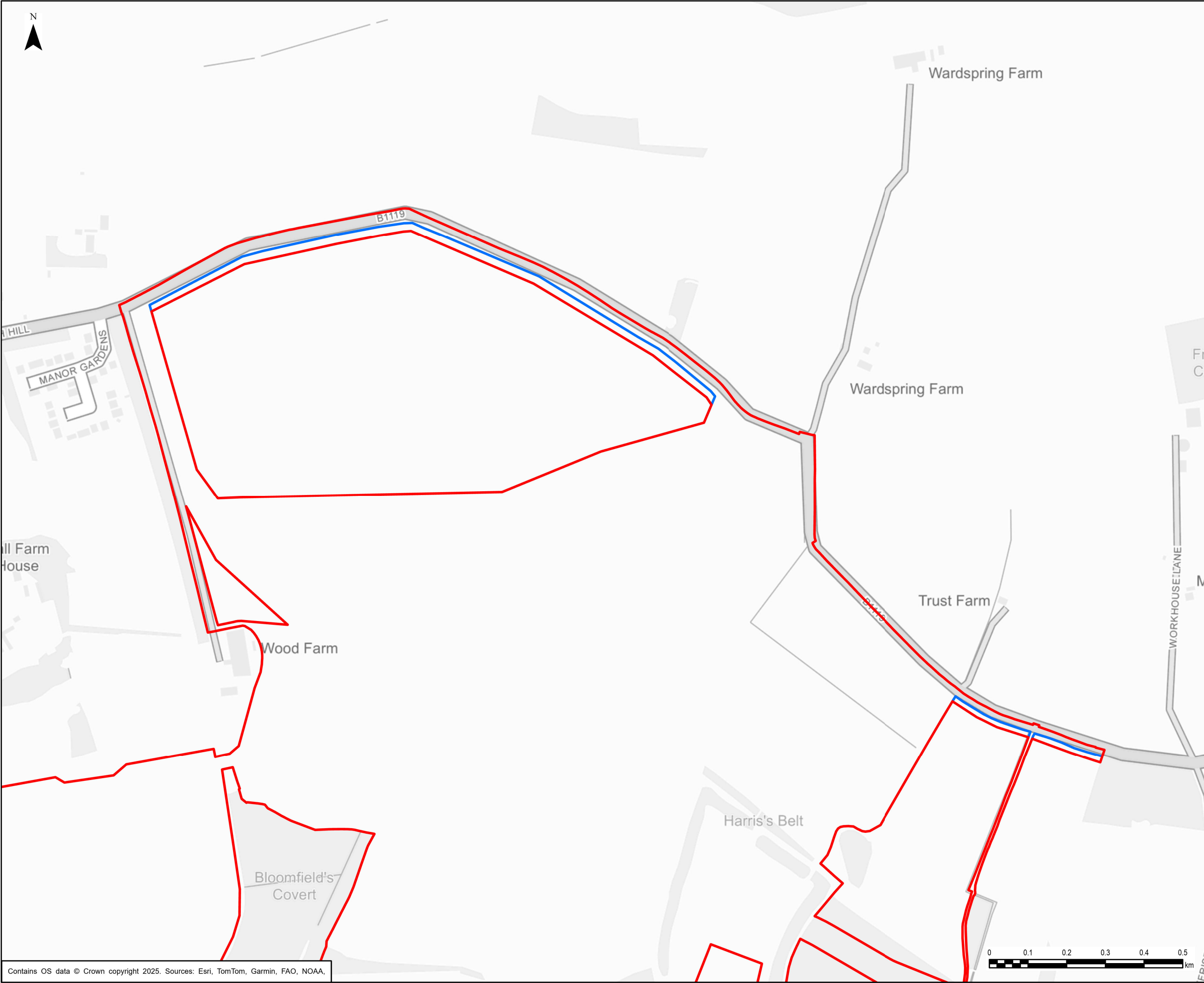
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Rev	Date	Description	GIS	Chk	App

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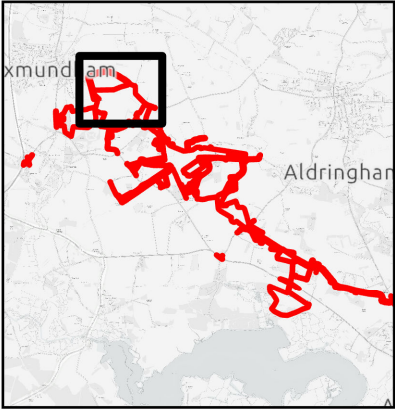
Scheme: SEA LINK

Document Title: CHANGE 3 - CHANGE TO THE ORDER LIMITS AT FRISTON TO PROVIDE FLEXIBILITY IN RELATION TO HERITAGE FEATURE, SUFFOLK

Creator: DF	Date: 25/11/2025	Checker: DF	Date: 25/11/2025	Approver: NP	Date: 25/11/2025
Document Ref: FIGURE 3	Scale: 1:7,500	Format: A3	Sheets: 1	Rev: 0	

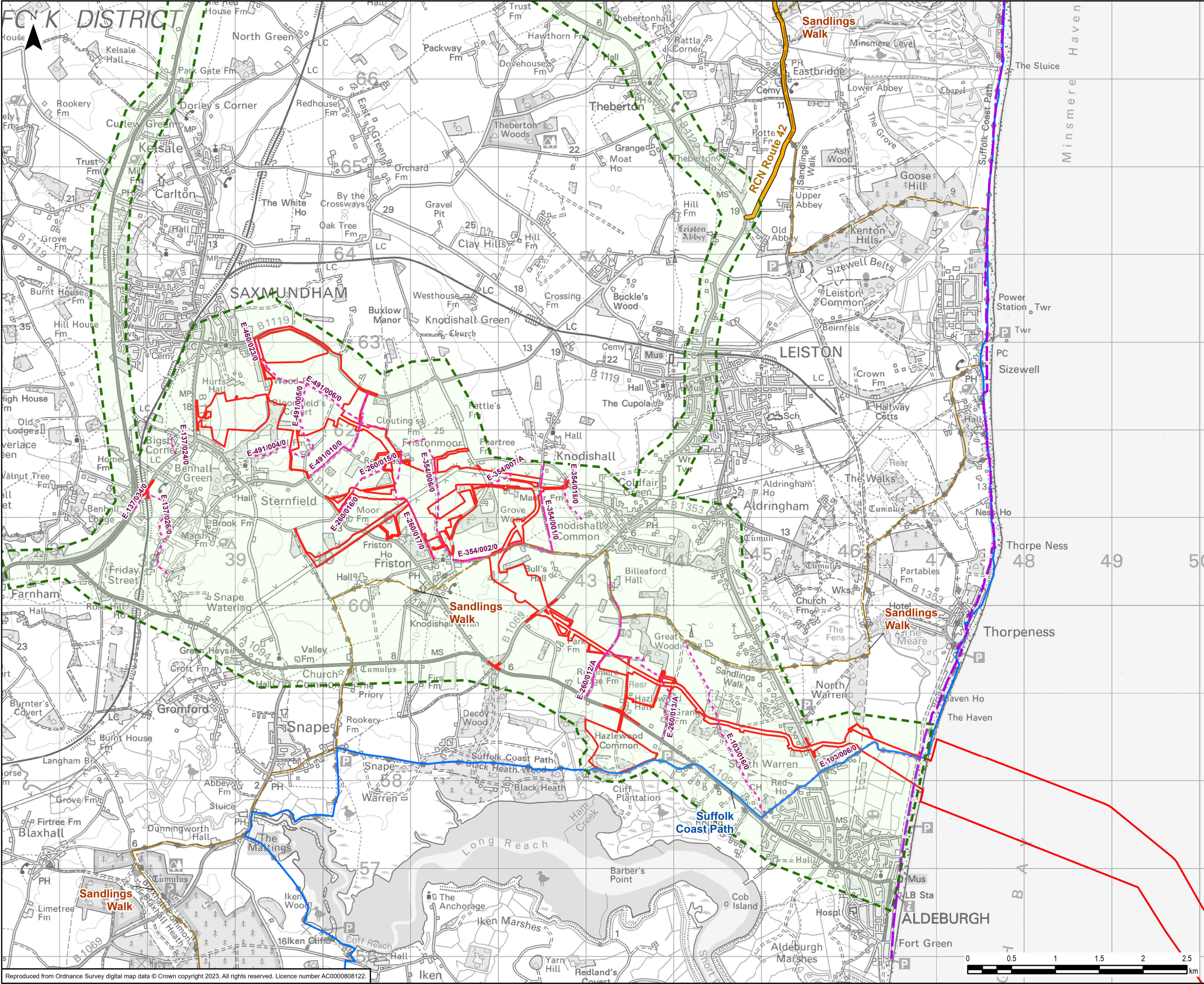


- Legend**
- Proposed Order Limits
 - Current Order Limits



0	25/11/2025	DESIGN CHANGE CONTROL	DF	ED	NP
Rev	Date	Description	GIS	Chk	App
nationalgrid					
Scheme: SEA LINK					
Document Title: CHANGE 5 - INCREASE IN AREA FOR MAINTENANCE OF A NEW HEDGE SOUTH OF B1119					
Creator: DF	Date: 25/11/2025	Checker: DF	Date: 25/11/2025	Approver: NP	Date: 25/11/2025
Document Ref: A5	Scale: 1:9,058	Format: A3	Sheets: 1	Rev: 1	

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- Legend
- Order Limits
 - Traffic and Transport Study Area
 - Regional Cycle Network
 - Proposed King Charles III England Coast Path
 - Sandlings Walk
 - Suffolk Coast Path
- Public Rights of Way
- Footpath
 - Bridleway

0	25/11/2025	ENVIRONMENTAL STATEMENT	EB	DF	TW
Rev	Date	Description	GIS	Chk	App
nationalgrid					
Scheme: SEA LINK					
Document Title: WALKING AND CYCLING ROUTES (INCLUDING PROWS AND BRIDLEWAYS) - SUFFOLK ONSHORE SCHEME					
Creator: EB	Date: 25/11/2025	Checker: DF	Date: 25/11/2025	Approver: TW	Date: 25/11/2025
Document Ref: FIGURE 6.4.2.7.4	Scale: 1:40,000	Format: A3	Sheets: 1	Rev: A	VER 2

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

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