

# SEA LINK

EN020026

## Comments on submissions received by Deadline 1 and 1A

Suffolk County Council

F76E1F05E

Deadline 2  
9 December 2025

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## Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Loads</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>EA1N&amp;EA2</i>	<i>East Anglia ONE North and East Anglia TWO</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ESC</i>	<i>East Suffolk Council</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>HGV</i>	<i>Heavy Good Vehicle</i>
<i>IEMA</i>	<i>Institute of Environmental Management and Assessment</i>
<i>ISEP</i>	<i>Institute of Sustainability and Environmental Professionals (formerly IEMA)</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>MMO</i>	<i>Marine Management Organisation</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWSI</i>	<i>Outline Scheme of Investigation</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SPD</i>	<i>Supplementary Guidance Document</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>

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

## Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written response to further information and submission received by the Examining Authority at Deadline 1 and 1A. Examination Library references are used throughout to assist readers.

Where SCC’s response to Deadline 1 and Deadline 1A submissions is contained in its Local Impact Report [REP1-130], SCC has not repeated that here. It is understood that the Applicant is expected to respond to SCC’s LIR at Deadline 2 in response to which SCC will make further representations as appropriate at Deadline 3.

## Comments on any further information/submissions received by Deadline 1 and 1A

### Section A – SCC Comments on Document 9.34.1 - 2.1 Applicant's Detailed Responses to the Relevant Representations of Suffolk County Council [REP1A-043]

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A1 - 2.2 Significant Issues</b>				
A1.1	<b>Benhall Railway Bridge RR 86</b>	The Applicant recognises that the bridge is weight restricted and gives details in relation to the options for implementing AIL access over the Benhall Railway Bridge included in the Application.	<p>The Applicant's response does not address SCC's concerns around the use of the bridge:</p> <ol style="list-style-type: none"> <li>1. For AIL movements, the impacts of the 'mini bridge' option have not been fully assessed, such as the greater levels of traffic due to diversion through Saxmundham and at the A12/B1119 Rendham Junction during closures of the road to allow temporary bridging.</li> <li>2. SCC remains concerned that the total number of movements that exceed the current weight limit has not been robustly evidenced noting that items of construction plant are delivered on load loaders that exceed the 46-tonne limit.</li> <li>3. It should be noted that SCC understands from its engagement with the Applicant that each AIL movement across the bridge will require a three-day closure of the bridge for the installation and removal of the mini bridge. In this scenario, closure of the bridge cannot be fully accommodated within a weekend meaning it will interact</li> </ol>	

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			<p>with weekday levels of traffic which includes high HGV numbers from Sizewell C, EA1N and EA2.</p> <p>4. Other details including what Temporary Traffic Management measures will be implemented to mitigate impacts and the design and layout of the mini-bridge have also not been provided. The lack of crucial details and assessments means that neither SCC nor the ExA can have full knowledge of the impacts this scenario could have.</p> <p>a. The deliverability of an overbridging option has not been demonstrated to SCC's satisfaction noting the difficult geometry of the site and potential impacts on the A12/B1121 junction and access to the residential park and PRoW.</p> <p>b. SCC considers this lack of assessment to contradict Advice Note 9 which states: <i>"4.9 If, in the course of preparing an ES, it becomes clear that it will not be possible to specify all the details of the Proposed Development, the ES must explain why and how this has been addressed. The ES will need to establish the relevant parameters for the purposes of the assessment. Where this approach is adopted the assessments in the ES should be undertaken on the basis of the</i></p>	

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			<p><i>relevant design parameters applicable to the characteristics of the Proposed Development included within the DCO. The assessment should establish those parameters likely to result in the maximum adverse effect (the worst-case scenario) and be undertaken accordingly to determine significance.”</i></p> <p>It is therefore questionable in terms of whether the inclusion of this option can be consented in accordance with EIA regulations and other relevant legislation without adequate assessment.</p> <p>c. The Applicant has provided an Assessment Approval in Principle for Benhall Rail Bridge to SCC to approve.</p> <p>However, SCC is required to commission its external maintenance contractor to assist in the approval of this assessment and will incur costs doing so. SCC cannot progress this issue until agreement is reached regarding funding this work. This work is outside the scope of the Planning Performance Agreement</p>	
A1.2	<b>River Fromus Crossing RR 10 -13</b>	The Applicant set out its stance regarding the need for the River Fromus crossing, disagreeing with SCC’s view	1. Given the potential long-term significant adverse effects of the proposed bridge and access route.	

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		that it provides a disproportionate solution for access to the Saxmundham converter station site. The Applicant sets out its key points around built heritage, landscape and visual and alternatives.	<p>2. SCC is not convinced that after 15 years the adverse effects would reduce to ‘minor adverse’, particularly should it be necessary to use the 6m clearance height design.</p> <p>3. SCC considers therefore that the Fromus crossing should be temporary only, as a permanent crossing is disproportionate and unnecessary. (Paragraph 5.72 Suffolk County Council Local Impact Report (REP1-130))</p> <p>In addition:</p> <ul style="list-style-type: none"> <li>a. SCC further considers that the landscape and visual effects of the bell mouth construction at the B1121 and proposed road from there to the bridge do not appear to have been sufficiently reflected in the assessment of effects.</li> <li>b. SCC notes that a consented access has been constructed to the south of the applicants proposed access. The use and proximity of this access needs to be included in the design considerations of the access of the B1121 to the Fromus Bridge.</li> </ul> <p>4. SCC does not agree with the Applicant (see paragraph 1.10.11 of [APP-048]) that the existing road and railway, which have both been long-established and are well integrated into the landscape can be relied upon as</p>	

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			detracting features in the landscape, which would reduce the negative impacts and adverse effect resulting from the proposals within the Fromus River valley.	
A1.3	<b>Insufficient land for mitigation within the Order Limits RR 17-19</b>	<p>The Applicant's explains process around reduction of Order Limits in response to the design and assessment of the Sea Link proposals.</p> <p>The Applicant explained their planned approach to coordination regarding landscape design.</p>	<p>SCC disagrees with the Applicant that the current DCO boundary includes sufficient land to fully mitigate adverse landscape and visual effects. Specifically:</p> <ol style="list-style-type: none"> <li>1. land to the north of the Converter station</li> <li>2. the River Fromus Crossing, which leaves little room for strategic landscape scale mitigative planting.</li> <li>3. SCC considers that the proposed planting along the B1119 is insufficient and that mitigative planting requires strategic layering to be most effective.</li> </ol> <p>In addition</p> <ol style="list-style-type: none"> <li>a. SCC is disappointed at the lack interest shown by the Applicant in pursuing co-benefits such as additional PROW or permissive routes, on the basis that these are not identified as essential mitigation in their ES.</li> </ol>	
A1.4	<b>Working Hours RR 20-21</b>	The Applicant justifies its proposed working hours for reasons including necessary flexibility and to facilitate	SCC is not convinced that the Applicant's response adequately justifies its proposed core working hours. The Applicant claims that these working hours provide necessary flexibility for its contractors and to deliver the project in a timely manner by 2030. However, SCC is aware of several	



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		project delivery according to 2030 targets.	<p>other projects, either consented or imminently awaiting decisions under the NSIP regime, which fulfil the criteria of being Critical National Priority infrastructure and/or contribute to the government's 2030 targets for low carbon energy infrastructure with greater restrictions on core working hours than those proposed by the Applicant. SCC has already cited examples such as EA1N and EA2 in its LIR. (Paragraph 14.59 – Suffolk County Council Local Impact Report (REP1-130))</p> <ol style="list-style-type: none"> <li>1. The core working hours for Sizewell C's offsite construction activities, including major enabling works such as the Sizewell Link Road, do not allow working past 1pm on Saturdays. Core working hours for these works exclude Sundays and Bank Holidays.</li> <li>2. The core working hours of the Five Estuaries Offshore Wind Farm, due to be decided by the Secretary of State on 17th December 2025, do not include Sundays and Bank Holidays. Work on Saturdays beyond 1pm cannot include high impact works for that project. These core working hours are identical to those proposed for the North Falls Offshore Wind Farm which is due to be decided on 28th January 2026. The onshore works to be undertaken for these projects are very similar in type and scale to those of Sea Link in terms of underground</li> </ol>	

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			<p>cabling installation via open cut; albeit, to connect to a substation rather than a converter station.</p> <p>3. Moreover, the core working hours found in requirement 20 of the Dogger Bank South Offshore Wind Farms draft DCO (decision date 10 January 2026) also excludes Sundays and Bank Holidays.</p> <p>It should be noted that the Secretary of State is required to decide the applications of these wind farms prior to the end of the Sea Link examination. SCC will provide appropriate updates on any made DCOs at a later deadline.</p> <p>These wind farms include onshore works which are similar in type and to those of the Applicant's project. Each project will contribute to the government's 2030 low-carbon energy targets. Whilst these wind farms are yet to receive development consent, they serve as relevant counterexamples to the Applicant's claim that its proposed working hours are necessary on grounds of flexibility and deliverability given the aforementioned similarities. Despite this, the applicants for these wind farms do not consider it necessary to retain the option for Sunday and Bank Holiday working in their core working hours. Therefore, SCC considers that the Applicant has not demonstrated that its proposed working hours are necessary for flexibility and to deliver the proposed project in a timely manner.</p>	

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			<p>SCC is aware of other NSIPs, including the Lower Thames Crossing, A14 Cambridge to Huntingdon Improvement Scheme, Thames Tideway Tunnel and HS2, which restricted working hours where particularly sensitive receptors such as residential areas would be impacted. This approach can be achieved without compromising the construction programme through well-planned project programming. The Applicant's position does not demonstrate that a similar approach would be unviable.</p> <p><b>Applicant's Description of the Proposed Project</b></p> <p>Another reason which, in SCC's view, undermines the Applicant's position relates to the Applicant's construction programme found in its Description of the Proposed Project [REP1A-003]. Paragraph 4.6.2 of that document states that the construction works are expected to be functionally completed by the end of 2031. Therefore, the Applicant's claim that the proposed working hours are necessary to deliver the project by 2030 is not reflected in its construction programme. It, therefore, appears to be inconsistent for the Applicant to suggest that working hours in line with SCC's proposal would prevent the project from being delivered by 2030 since the project is not designed to be delivered by 2030 in any case.</p> <p>In addition, even an operational date of 2031 would seem questionable, given that the project timeline in Table 4.10 is</p>	

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			<p>premised on a DCO consent by the end of Q2, 2026. Clearly that date would not seem realistically achievable, given that the Examination is not expected to conclude before May 2026.</p> <p><b>Impacts on public health and wellbeing</b></p> <p>The proposed construction working hours present a significant concern for the protection of public health. The working hours as proposed, leave local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption.</p> <p>Continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel.</p> <p>The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities with more vulnerable members being impacted to a greater extent. SCC considers the considerations set out here and elsewhere require its request for more restrictive working hours to be implemented.</p>	

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			Whilst it is noted that percussive piling is proposed to be restricted to the hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, it nevertheless still presents public health concerns. Noise and vibration from piling, alongside construction related traffic, may impact community wellbeing and access to social infrastructure even when works are not immediately adjacent to residential properties. Particularly, early morning starts from 07:00 may coincide with sensitive periods for residents, disrupting sleep and rest, and increasing stress particularly for vulnerable groups. Similar concerns apply to the permitted HGV movements on Sundays and Bank Holidays.	

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<b>Table A2 - 2.3 Landscape and Visual</b>				
A2.1	<p><b>Potential adverse effects on landscape and visual mitigation measures of other projects</b></p> <p><b>Appendix 1- Detailed Technical Comments RR 5-6</b></p>	The Applicant explained they are working with SPR EA1N and 2 to provide a coordinated landscape mitigation plan.	<p>Whilst SCC welcomes greater coordination between the Applicant and SPR, it does not see how this could avoid compromising the effectiveness of the landscape mitigation planting implemented by EA1N and EA2 along with the accompanying footpath around the substation. ESC explains in paragraphs 6.4.3.5 and 6.4.3.6 of its LIR [REP1-128] that the mitigation planting could not be replaced if open cut cable installation is used due to root interaction with the cables causing permanent reduction in the effectiveness of that mitigation.</p> <p>This concern also applies to the footpath being created by SPR around the substation site which would face closure and disruption through Sea Link's open cut connection to the Kiln Lane substation. This would likely influence the habits of users and reduce future usage due to lengthy disruption and would require reinstatement.</p> <p>SCC does not see how the Applicant's commitment to coordination will secure avoidance of these impacts. SCC therefore reiterates its position that HDD should be used to connect to the Kiln Lane substation where the cable route interacts with SPR's mitigation as a</p>	

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			necessary measure to avoid impacting that mitigation as far as possible.	
A2.2	<b>Landscape and visual mitigation RR 19 -21</b>	<p>The Applicant sets out the importance of good design and mitigation hierarchy and how the scheme sets out to comply with the policy relating to good design.</p> <p>The Applicant relates its stance regarding landscape mitigation to position taken on other consented National Grid projects.</p>	<p>SCC recognises the requirements of EIA regulations as cited by the Applicant but rejects that this justifies the Applicant's position. The key phrase in relation to offsetting – “if possible” – means that the possibility for offsetting any significant adverse effects must be considered and ruled out before it can be reasonably rejected.</p> <p>This exercise does not appear to have been undertaken by the Applicant.</p> <p>The Applicant should explore options for offsetting measures. SCC is happy to engage further with the Applicant on this matter.</p> <p>SCC notes the embedded mitigation proposed by the Applicant in relation to the Converter Station in terms of planting but emphasises that significant residual impacts remain and that further mitigation must be considered according to policy requirements. SCC directs the Applicant to paragraph 5.71 of its LIR [REP1-130] and to paragraph 6.3.8.6 and Figure 2 of ESC's LIR [REP1-128], which SCC fully supports and in which areas for additional planting to mitigate residual effects of the Converter Station are suggested.</p>	

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<b>Table A3 - 2.5 Cultural Heritage</b>				
A3.1	<b>Draft Development Consent Order RR 149</b>	Updates to draft Development Consent Order.	<p>In line with comments made in the Suffolk County Council Local Impact Report (REP1-130) changes, DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the Outline Written Scheme of Investigation (OWSI) to secure this; therefore, Suffolk County Council Archaeological Service (SCCAS) advise the need for the applicant to make amendments to the current wording of DCO Requirement 14 in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery of the project and prevent potential delays to the sign off of archaeological requirements.</p> <p>The clause relating to human remains (DCO Part 4 Supplemental Powers) also needs amending to prevent</p>	REP1-037



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			<p>issues in appropriately dealing with archaeological human remains and potential delays to the project.</p> <p>Detailed comments regarding suggested appropriate wording can be found in the Suffolk County Council Local Impact Report (REP1-130) in section 7.138-7.144. The suggested wording is in line with the wording of the approved Sizewell C DCO, which is currently being implemented with great success with regards to both securing appropriate archaeological mitigation whilst meeting project delivery requirements.</p>	
A3.2	<b>General comments on Response to Relevant Representations RR 32, 33, 35, 43</b>		<p>SCCAS are pleased that the applicant has committed to updating the Outline Onshore OWSI - Suffolk [APP-343] in line with the comments set out within the Suffolk County Council Local Impact Report (REP1-130) paragraphs 7.83-7.132.</p> <p>SCCAS are concerned that there has been no engagement from the applicant within their response to the Relevant Representations regarding the advice which was set out within this by SCCAS relating to the need for the applicant to update DCO Requirement Wording 14 and the Part 4 Supplemental Powers (see above for further details). SCCAS would welcome further discussion on this matter with the applicant at the earliest opportunity.</p>	REP1-111 and REP1a-043

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			Any works within the area of KND 009 must be in line with the agreed Preservation in Situ strategy being followed by the EA1N/2 project (SCCAS do not agree with the interpretation made in the geophysical survey report and as no trial trenched evaluation has been undertaken within this part of the proposal area, a cautious approach must be followed given this is a possible church site with the potential for the survival of remains of high significance).	

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<b>Table A4 - 2.6 Water Environment</b>				
A4.1	<b>Flood risk at Friston</b> <b>RR 22-25</b>	The Applicant stated the drainage strategy represented an indictive situation whereby drainage is implemented only for the proposed project and that the delivery of the Kiln Lane (Friston) would only happen in one set of circumstances.	The Applicant needs to clearly demonstrate that the outline surface water drainage strategy (Appendix C of [APP-292]), adheres to the <b>National standards for sustainable drainage systems (SuDS)</b> . Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292] is in the LLFA opinion lacking insufficient detail at this time to provide sufficient assurance that a surface water drainage strategy will be implemented in accordance with LLFA requirements, i.e. basin depth, water depth, side slopes etc. The DCO should reference an outline drainage strategy for both the converter station and the substation	[APP-292]
A4.2	<b>Water reuse</b>		The LLFA also recognises that the Applicant has alluded to water reuse being included in the overall SuDS proposals; for instance, around the Saxmundham Converter Station, which is stated as a key design principle in [APP-366]. Whilst this is welcomed, the LLFA considers that the Applicant should provide a comprehensive strategy for water reuse during construction with details of storage and management. It is widely acknowledged that the Sizewell C project has water scarcity issues, resulting in water management/reuse. There may be adjacent landowners where they would welcome addition water for irrigation.	[APP-366]

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A4.3	<b>Sustainable drainage</b>  <b>RR 25</b>	The Applicant explained surface water strategy.	The applicant should be required to submit a construction surface water drainage strategy as part of a discharge of requirement for all developed areas in accordance with the <b>National standards for sustainable drainage systems (SuDS)</b> . SCC recognises the commitment made in the REAC regarding SuDS which should be updated to reference the National Standard.	

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<b>Table A5 - 2.9 Traffic and Transport</b>				
A5.1	<b>Benhall Railway Bridge RR 86 - 87</b>	The Applicant gives details in relation to the options for implementing AIL access over the Benhall Railway Bridge included in the Application.	<p>The Applicant's response does not address SCC's concerns around the use of the bridge for AIL movements. The impacts of the 'mini bridge' option have not been fully assessed, such as the greater levels of traffic at nearby A12 junctions during closures of the bridge. It should be noted that SCC understands from its engagement with the Applicant that each AIL movement across the bridge will require a three-day closure of the bridge for the installation, AIL movement and removal of the mini bridge. In this scenario, closure of the bridge cannot be fully accommodated within a weekend and would interact with weekday levels of traffic which includes those generated from Sizewell C, EA1N and EA2 using the A12.</p> <p>Whilst SCC recognises that a three-day closure would cause temporary effects, SCC understands that repeated closures would be required for each AIL movement. SCC would appreciate clarity on the number of closures of the Benhall Rail Bridge required for the Applicant to retain this option so that the worst-case scenario of duration of effect can be established</p> <p>Other details including what Temporary Traffic Management measures will be implemented to mitigate impacts have also not been provided. Drawings showing indicative design and layout of the option have not been</p>	

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			<p>provided either, meaning the feasibility of the option is unclear. The lack of crucial details and assessments means that neither SCC nor the ExA can have full knowledge of the impacts this scenario could have.</p> <p>SCC is unable to evaluate the feasibility of potential mitigation measures and questions the Applicant's confidence that it will be able to minimise impacts to a sufficient extent without any detail of these potential measures being provided.</p> <p>SCC considers this lack of assessment to contradict Advice Note 9 which states: <i>"4.9 If, in the course of preparing an ES, it becomes clear that it will not be possible to specify all the details of the Proposed Development, the ES must explain why and how this has been addressed. The ES will need to establish the relevant parameters for the purposes of the assessment. Where this approach is adopted the assessments in the ES should be undertaken on the basis of the relevant design parameters applicable to the characteristics of the Proposed Development included within the DCO. The assessment should establish those parameters likely to result in the maximum adverse effect (the worst-case scenario) and be undertaken accordingly to determine significance."</i></p>	

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			<p>It is therefore questionable whether the inclusion of this option can be consented in accordance with EIA regulations and other relevant legislation without adequate assessment.</p> <p>Specifically for the closure of the B1121 at the Benhall Rail Bridge, diverted traffic would likely impact the B1119/B1121 signalised crossroads in Saxmundham and the A12/B1119 Rendham junction. The diversion of traffic from cumulative schemes should also be considered.</p> <p>The B1119/B1121 Mill Lane 4-way traffic lights in the centre of Saxmundham – over capacity already at peaks, will be even worse with diversion route, not anything you can do without knocking windows down. There is also a safety concern in relation to the Primary School on Brook Lane in terms of students crossing the road to get to school.</p> <p>The Applicant has provided an Assessment for Approval in Principle for Benhall Rail Bridge. Due to restricted in-house resources SCC is required to commission a term maintenance contractor assist in the approval of this assessment and will incur costs doing so. SCC cannot progress this until agreement is reached regarding funding this work.</p>	

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<b>Table A6 - 2.10 Public Rights of Way</b>				
A6.1	<b>Lack of respite for PRow users RR 21 and RR 99</b>	The Applicant explained controls around working hours and mitigation measures to reduce impacts on tourism and PRow.	<p>The Applicant projects that there will be, on average, no more than three HGV movements per hour between 7am and 5pm on Sundays and Bank Holidays, which the Applicant suggests will not be perceptible. However, averaging out a daily total in this way does not necessarily reflect how users will experience this level of HGV movements.</p> <p>The Applicant is not proposing an hourly limit (so within any given hour there could be considerably more than three movements). Also, even if there was a broadly even distribution of HGV movements during the construction hours, such a pattern of use would mean there is little respite for PRow users on Sundays and Bank Holidays during construction.</p> <p>If all PRowS are given priority over construction roads and are manned and/or gated to give PRow priority, horse rider on bridleways may have different experiences to other PRow users. One day of no construction and construction traffic would be beneficial to horse riders and their horses, thus encouraging the use of these routes for recreation and tourism.</p>	
A6.2	<b>Cumulative effects on</b>	The Applicant states that diversions and closures of PRowS will be coordinated	In principle, SCC supports greater coordination between projects to minimise negative impacts. However, SCC is	



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	<b>PRoWs</b>  <b>RR 21, RR 30, RR 36, RR 92, and RR 93</b>	<p>with EA1N and EA2 to mitigate cumulative effects.</p> <p>The Applicant also explained the assessment of likely significant cumulative impacts of the scheme on PRoWs.</p>	<p>concerned by the lack of detail given by the Applicant on how this measure will ensure cumulative effects are adequately mitigated.</p> <p>SCC understands that the Applicant has a working relationship with SPR as the promoter of EA1N and EA2 and would like confirmation from the Applicant that SPR is supportive of the Applicant's proposal in terms of its feasibility and effectiveness.</p> <p>For instance, the Applicant must be aware of the respective works programmes of EA1N and EA2 in terms of their planned timings of PRoW diversions and closures to ensure that these are compatible with the Applicant's own programme. Problems would arise if these closures and diversions are to be implemented by SPR prior to Sea Link gaining development consent or otherwise cannot be made compatible with the Applicant's works programme. Without these details, SCC cannot be confident that the measure will adequately mitigate cumulative effects as claimed by the Applicant.</p> <p>There is also a lack of detail regarding how the effectiveness of the measure will be measured and secured. Due to their different works programmes, PRoWs could be diverted/closed for a longer period at a time than were they affected by just one of the promoters. There may also be impacts which are different in kind</p>	

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			<p>which arise from longer but fewer PRow closures/diversions according to the behaviours of users. There should be a worst-case scenario assessment of how PRowS will be affected with this mitigation in place to give local stakeholders and the decision maker confidence that cumulative effects on PRowS will be adequately mitigated. This would then provide a Rochdale Envelope whereby the Applicant commits to not exceed the effects assessed.</p> <p>At minimum, the Applicant should make commitments to implement alternative forms of mitigation where the proposed coordination cannot achieve the required level of mitigation.</p> <p>SCC is willing to engage with the Applicant regarding what alternative arrangements would be appropriate.</p>	
A6.3	<b>Public Rights of Way Management Plan RR 94</b>	<p>The Applicant states that diversion routes of equivalent nature and connectivity have been identified in areas where temporary closures to PRowS are required.</p> <p>Safety measures have also been outlined for crossing points which have interactions with construction activities.</p>	<p>SCC wishes to see a commitment to keep PRowS open as far as possible and to give PRow users priority.</p> <p>Extra information that should be provided in the PRow MP that has been included in similar schemes such as EA1N is:</p> <p><i>Management measures will be in place to ensure the continued safe use by the public of the PRow which cross the onsite access route (i.e. the Substations Haul Road (SHR)).</i></p>	

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			<p><i>The following safety measures will also be employed for each PRow crossing:</i></p> <ul style="list-style-type: none"> <li><i>Where a PRow crosses the haul road, the surface will be firm, smooth, level, and free draining with no loose stones or voids on the surface. This may require additional work to the type 1 surface such as compacting fines (4 or 6mm to dust aggregate) to fill voids.</i></li> <li><i>No steps or gradients will be introduced which could deter wheeled users (1in 20 is accepted standard). The crossing will be maintained in a safe and fit condition for use by pedestrians, wheeled users, cyclists, and equestrians (as appropriate) all year round, to the reasonable satisfaction of the Highway Authority.</i></li> <li><i>Use of signage (including Give Way signs) to ensure that haul road users are aware of the potential for PRow users to cross their path and PRow users are aware that they are approaching a construction interface with the associated hazards.</i></li> <li><i>Use of vehicle marshals during construction hours to ensure the general public using the PRow are able to safely cross the construction area.</i></li> </ul>	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			<ul style="list-style-type: none"> <li>• A speed restriction to 10mph along the haul road/construction roads in the vicinity (circa 20m) of the PRow (speed limit on the remainder of the haul road will be 30mph).</li> <li>• Information regarding the presence of the PRow and the potential for PRow users will be included in the Method Statements, such that vehicle and plant operators will be mindful always for members of the public (hikers, dog walkers, horse riders, cyclists etc).</li> <li>• No-reversing restrictions will be in place at locations where construction traffic interact with PRow.</li> <li>• Stopping/parking of vehicles and mobile plant will not be permitted at locations where construction traffic interact with PRow.</li> <li>• Temporary fencing to be installed along the length of the working width, with gaps in the fencing to allow access along the PRow. Signage will be in place so that users can quickly identify the continuation of the route across the haul road.</li> <li>• Information regarding these measures will be a compulsory part of the induction training for drivers.</li> </ul>	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			<ul style="list-style-type: none"> <li><i>The surface of each PRow where it crosses the construction road will be kept in a safe and fit condition at all times for all legal users. The PRow will be maintained to a standard agreed with SCC as Local Highway Authority; and</i></li> <li><i>The positioning of site notices will be carefully considered to keep sign clutter to a minimum and to collate information on route closures where appropriate. Signs will be carefully worded with clear, uncomplicated information showing maps that the public would be familiar with (e.g. OS maps with topography context) to give them confidence that their walk or ride will still be possible, albeit with a minor diversion.</i></li> </ul> <p><b>PRow Reinstatement</b></p> <p><i>The following measures will be followed:</i></p> <ul style="list-style-type: none"> <li><i>A pre-construction and post-construction survey of the PRow (surface condition and street furniture) affected will be undertaken by an experienced surveyor. The results of these surveys will be shared with SCC.</i></li> <li><i>A qualified Agricultural Liaison Officer (ALO) will be employed to ensure that information on existing</i></li> </ul>	

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			<p><i>land conditions is obtained, recorded, and verified during the PRow surveys.</i></p> <ul style="list-style-type: none"> <li><i>The ALO will act as the point of contact for the restoration of the PRow.</i></li> <li><i>The pre-condition and post-construction surveys will include a photographic record with accompanying map and table listing: -</i></li> </ul> <p><i>Date record taken</i></p> <p><i>Map reference</i></p> <p><i>Reference and type of PRow</i></p> <p><i>Overview description of PRow, giving average width, surface type, general condition</i></p> <p><i>Highlighting any defects in current condition such as wet areas, pre-existing surface damage such as ruts, compaction, or obstructions</i></p> <p><i>Note any other vehicle use (farm or private vehicle use)</i></p>	
A6.4	<b>Converter Station site RR 100</b>	The Applicant states that the current proposals do not include any additional opportunities for recreation as such mitigation has not been identified as essential in the ES.	SCC PRow considers the loss of amenity due to walking around new buildings instead of countryside and the increased traffic impact on the B1119 to be reasons to request the modest mitigation put forward.	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
A6.5	<b>Improvements to the PRow network RR 101</b>	The Applicant confirms that surfacing of E/103/006/0 from Sluice Cottage to the old railway line is not included for mitigation as it is not a requirement of the EIA. The Applicant is willing to engage with SCC on this matter.	SCC PRow welcomes the engagement on the other requests to enhance the PRow network and would request that this is discussed and agreed at the earliest opportunity.	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A7 - 2.11 Socioeconomics, Recreation and Tourism</b>				
A7.1	<b>Engagement quality RR 103</b>	Applicant states engagement has been extensive and thematic meetings held; proposes Social Value strategy with contractors.	SCC does not agree that engagement to date has been sufficient. The Applicant's reliance on thematic meetings and high-level consultation falls short of the comprehensive collaboration expected by SCC. Engagement should not be limited to information exchange but must actively promote co-design of strategies that deliver measurable benefits for Suffolk.	
A7.2	<b>Local business growth RR 104</b>	Applicant acknowledges potential benefits but does not commit to a project-specific Skills and Employment Strategy.	<p>SCC considers the Applicant's position unacceptable. The absence of a project-specific Skills and Employment Strategy undermines the ability to deliver meaningful socio-economic benefits to Suffolk communities; despite the significant impacts they will experience from hosting this infrastructure.</p> <p>SCC requires the Applicant to prepare and secure a comprehensive Skills, Employment and Supply Chain Plan (SESP) through a Development Consent Order Requirement or a legally binding agreement. This plan must define clear geographies for supply chain engagement at hyper-local, local, and regional levels, recognising Suffolk's role as part of the UK's energy cluster. It should set ambitious targets for SME participation and local procurement, supported by structured inward investment actions to attract Tier 1 and Tier 2 contractors to the region. The SESP must also</p>	



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			<p>include robust monitoring and reporting mechanisms for local spend and Gross Value Added (GVA), ensuring transparency and accountability throughout the project lifecycle.</p> <p>Without these commitments, the Applicant's approach risks delivering negligible local benefit and exacerbating existing inequalities, contrary to SCC policy objectives for inclusive growth and the national requirement to consider socio-economic impacts and legacy benefits.</p> <p>The proposed plan would also allow the Applicant to have an adaptive approach according to the effects of the growing number of NSIPs on skills and workforce and potential changes in effects during delivery of these projects given present uncertainties.</p> <p>A SESP would ensure that the Applicant's activities in relation to skills and workforce account for the scenario it finds itself in through a collaborative approach with local authorities to ensure effects do not exceed those assessed and benefits are realised. A binding SESP is therefore essential to secure positive outcomes for Suffolk's economy and workforce.</p>	
A7.3	<b>Workforce competition and churn</b> <b>RR 107</b>	Applicant concludes cumulative labour supply is sufficient within a 60-minute travel area.	SCC strongly disagrees with the Applicant's conclusion that cumulative labour supply will be sufficient within a 60-minute travel area. This assumption fails to account for the significant pressure on specialist skills created by	Energy and Climate Adaptive Infrastructure

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			<p>multiple NSIPs operating concurrently in Suffolk and the wider region. These schemes will overlap in construction timelines and compete for similar roles such as high-voltage plant specialists, cable jointers, commissioning engineers, traffic management operatives, ecologists, and heritage specialists. The cumulative demand for these skills will far exceed local availability, creating risks of displacement, wage inflation, and labour churn that could negatively impact local businesses and service delivery.</p> <p>SCC expects the Applicant to undertake detailed scenario-based workforce modelling that reflects low, medium, and high demand profiles for each project phase and skill category. This modelling must identify peak labour periods and quantify displacement risks, enabling the development of robust mitigation measures. SCC's Supplementary Guidance also requires promoters to assess the interaction between labour demand and other NSIPs and to implement strategies that maximise local employment opportunities while minimising negative impacts on the regional economy.</p> <p>Mitigation measures must include coordinated phasing of works to reduce concurrent demand, wage inflation controls, and the creation of shared training pipelines to build local capacity for specialist roles. Collaboration with other NSIPs and full engagement with SCC's Regional</p>	Policy: The Socio-economic Effects of NSIPs Supplementary Guidance

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			Skills Coordination Function is essential to deliver these outcomes.	
A7.4	<b>Study Area definition RR 108</b>	Applicant uses a single 60-minute travel radius based on CIPD data.	<p>SCC requires dual geographies: workforce geographies by phase and skill, and supply chain geographies at hyper-local, local, and regional levels. The methodology for defining these geographies must be agreed with SCC prior to reliance in the Examination. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two elements.</p> <p>For the workforce, the applicant should first define the distinct phases of the project—such as civils, mechanical and electrical, and commissioning—at the most granular level supported by available data and knowledge and identify the duration of each phase along with the skills required. Once these elements are established, the applicant must define an economic study area for the workforce that considers factors such as the differing propensity for travel between skilled and unskilled workers, the influence of role duration, the availability of public transport and local road networks, preferred travel methods, and correlation with the Traffic and Transport methodology.</p> <p>The expected outputs of this analysis include a clearly defined geography from which unskilled and semi-skilled</p>	Energy and Climate Adaptive Infrastructure Policy: The Socio-economic Effects of NSIPs Supplementary Guidance

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			labour can be drawn for each work phase, and a corresponding geography for skilled labour for each distinct phase.	
A7.5	<b>Scenario modelling RR 109</b>	Applicant applies worst-case assumptions but provides limited phase-specific data.	<p>SCC expects the Applicant to undertake robust scenario-based workforce modelling that goes beyond the limited assumptions currently presented. Specifically, the Applicant must provide low, medium, and high scenarios for both home-based and non-home-based workforce requirements, broken down by month and by work package, to reflect the full temporal profile of labour demand throughout the construction period. This modelling should incorporate the distinct phases of the project—such as civils, mechanical and electrical, and commissioning—and identify the skills required within each phase.</p> <p>SCC policy also requires that this analysis considers the interaction between labour demand and other NSIPs operating concurrently in Suffolk, to ensure that displacement risks and pressure on local services are fully understood.</p> <p>Outputs from this modelling should include a clear temporal workforce profile, identifying peak labour periods and associated risks for traffic management, accommodation capacity, and service provision. This evidence base is essential for developing mitigation</p>	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			measures such as phased scheduling, transport interventions, and accommodation protocols. Without this level of detail, the socio-economic assessment cannot provide a robust foundation for planning obligations or legacy commitments, and the risk of significant cumulative impacts will remain unaddressed.	
A7.6	<b>Local employment leakage RR 110-111</b>	Applicant anticipates 70% leakage due to specialist roles; coordination with 'College on the Coast' considered.	SCC considers this unacceptable as the majority of jobs created by the project would be filled by workers from outside the local area. Therefore, there will be minimal benefit to Suffolk communities, despite significant disruption and negative impacts, particularly when considered cumulatively. A binding Skills and Employment Plan must be in place with clear targets for local trainees, apprenticeships, and under-represented groups. Furthermore, coordination with initiatives such as "College on the Coast" alone is insufficient because it does not guarantee structured interventions or measurable outcomes. SCC expects a formal plan that sets clear targets for local trainees and under-represented groups, supported by accredited bootcamps and pathways aligned to project phases. This approach is essential to mitigate workforce displacement and churn, address regional skills shortages, and ensure a lasting legacy for Suffolk rather than short-term external labour gains.	

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A7.7	<b>Labour sensitivity</b> <b>RR 112</b>	Applicant assesses local labour force as low sensitivity.	<p>SCC disagrees with the Applicant's assessment that the local labour force is of low sensitivity. This conclusion fails to reflect the cumulative demand created by multiple NSIPs in Suffolk and the wider region. These projects will overlap in construction timelines and compete for similar specialist skills, creating significant pressure on the local labour market. SCC considers that sensitivity should be rated medium to high, given the existing skills shortages identified in recent regional and national workforce reports, including the Clean Energy Jobs Plan, CITB Workforce Outlook 2025–2029, and SCC's own Energy and Climate Adaptive Infrastructure Policy.</p> <p>SCC expects the assessment to use SCC's criteria for sensitivity, which include availability of labour by skill type, spare capacity in the local market, phase duration, training lead times, and cumulative draw-down across all NSIPs. This analysis must be supported by current regional workforce data and scenario-based modelling to reflect worst-case conditions. Without this, the socio-economic assessment cannot provide a robust evidence base for mitigation planning, and the risk of displacement, wage inflation, and labour churn will remain unaddressed.</p>	<p>Clean Energy Jobs Plan</p> <p>CITB Workforce Outlook 2025–2029</p> <p>Energy and Climate Adaptive Infrastructure Policy: The Socio-economic Effects of NSIPs Supplementary Guidance</p>
A7.8	<b>Operational employment</b> <b>RR 113</b>	Scoped out.	SCC expects operational employment to be scoped in cumulatively. Operational employment, even if modest, contributes to long-term economic resilience when	

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			<p>considered alongside other projects in the region, which collectively create a cluster of energy assets requiring skilled maintenance and operational staff.</p> <p>Legacy measures should include internships, apprenticeships, and other pathways.</p>	
A7.9	<b>Ongoing skills governance</b> <b>RR 114</b>	Applicant proposes exploring coordination with other projects but no specific strategy.	<p>SCC requires the Applicant to establish an agreed governance framework for skills and educational enhancement in collaboration with Suffolk County Council, as set out in the Supplementary Guidance.</p> <p>This framework must align with SCC's Regional Skills Coordination Function and ensure that skills and employment initiatives are coordinated with existing regional programmes. The governance approach should provide clear accountability for delivery, include mechanisms for monitoring progress against agreed targets, and allow adaptive programming to respond to construction phasing and labour market pressures. This arrangement must be secured through a Requirement in the Development Consent Order or via a legally binding agreement to guarantee compliance and transparency.</p>	Energy and Climate Adaptive Infrastructure Policy: The Socio-economic Effects of NSIPs Supplementary Guidance
A7.10	<b>Tourism and Visitor Perception</b> <b>RR 115 - 117</b>	The Applicant cites the Sizewell C visitor perception survey and monitoring reports from Sizewell B and Hinkley Point C to conclude that there are no likely material negative impacts	SCC does not share the Applicant's confidence that there will not be material adverse effects on tourism. The Applicant cites monitoring reports from Sizewell B and	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
		on tourism in terms of visitor perception	<p>Hinkley Point C, but these projects do not share the same contexts as Sea Link in terms of cumulative effects.</p> <p>Sea Link will be constructed and operated in the context of multiple other NSIPs in the vicinity being constructed and operated, including upcoming projects such as Lion Link and Helios Solar. The comparison to Sizewell B diverges in this way. Sizewell C and Hinkley Point C were consented with sizeable mitigation funds for negative effects on tourism, the likelihood of which is supported by the Sizewell C visitor perception survey cited by the Applicant where over a third of respondents indicated that the project could discourage them from visiting the local area. This survey could not account for the construction and operation of future projects including Sea Link.</p> <p>It can reasonably be concluded that the presence of additional NSIPs would further impact visitor perception. Moreover, the monitoring reports from Hinkley Point C cannot be interpreted as representing unmitigated impacts on tourism as extensive measures have been undertaken to mitigate and offset those impacts. In fact, that the promoters for Hinkley Point C and Sizewell C included funds to mitigate and offset impacts on tourism suggest the promoters and the decision maker considered material negative impacts on tourism likely and justified the necessity of those measures.</p>	



Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			<p>Sizewell C's mitigation measures do not account for effects from future projects such as Sea Link on the local tourism industry, meaning these effects will be unmitigated.</p> <p>In summary, SCC does not consider the available evidence to demonstrate that there will be no material negative impacts on tourism. SCC recognises the limited evidence available on the matter; however, it is the responsibility of the Applicant to gather further evidence. If this is not undertaken, SCC would consider a commitment to further assessment post-consent and a contingency fund, should evidence of negative impacts be found at a later date to ensure such impacts are adequately mitigated or offset, to be a suitable and necessary approach in this scenario</p>	
A7.11	<b>Impact of workers on visitor economy RR 118-119</b>	The Applicant reiterates the findings of no significant effects from its peak construction workforce on visitor and tourism accommodation.	<p>SCC has set out its position on the potential for negative impacts on tourism, including visitor accommodation, in its LIR [REP1-130], such as at paragraphs 13.53 to 13.59.</p> <p>SCC would like to add that it is unlikely that the Applicant's assessments which are referred to truly represent the worst-case scenario. The figure referred to as the project's peak workforce number is 324 Full Time Equivalent ("FTE").</p> <p>The fact that the figure is measured in this way means that the raw number of peak workers may be much higher on</p>	

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			<p>account of part-time working which would increase impacts on local accommodation, potentially undermining the robustness of the assessment. The Applicant should clarify whether the 324 figure represents the peak worst case total figure of workers or whether the raw number is higher when accounting for part time working.</p> <p>SCC is also concerned about the lack of avenues for mitigation should cumulative effects exceed those currently assessed. Monitoring reports and projections from Hinkley Point C show that on-site workforce count has increased to over 12,000 with an extra 3,000 expected by the summer of 2026 which significantly goes beyond the 5,600 assessed in that project's Environmental Statement. Sizewell C's workforce count was assessed as being 7,900 in the worst case scenario. Should this number increase, there is no provision in the Sea Link application for any adjustment in approach to socioeconomic cumulative effects, including effects on the visitor economy. Given the evidence from Hinkley Point C, SCC considers that there should be provision in the application to respond appropriately to the dynamic cumulative context regarding socioeconomic effects. SCC's request for a management plan covering socioeconomic effects is one avenue which could ensure that the project's delivery is adaptable in the face of</p>	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			significant uncertainty around the future effects of Sizewell C and other NSIPs in the area.	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A8 - 2.12 Health and Wellbeing</b>				
A8.1	<b>Community engagement RR 123-125</b>	The Council encourages use of the Suffolk County Council Community Engagement and Wellbeing Supplementary Guidance Document (SGD). Applicant indicates the engagement process is in accordance with legislative requirements.	<p>Whilst the Applicant's Consultation Report may demonstrate compliance with the minimum legislative requirements, The Council's SGD and the Council's established position make clear that effective engagement must extend well beyond this legal baseline. The Council expects the Applicant to build and maintain relationships of trust, confidence, and mutual understanding with local communities, adopting a genuinely collaborative approach at every stage of the project.</p> <p>This is not solely a matter of meeting procedural fairness, but is also essential for safeguarding community wellbeing, particularly mental health, where cumulative impacts continue to increase with each new project. Meaningful engagement requires ensuring that residents feel heard, that their views are demonstrably taken into account, that community leaders are supported in their roles and that promoters work proactively and collaboratively to minimise and mitigate adverse effects on community wellbeing.</p> <p>The Council considers it essential that the Applicant adopts a pragmatic, responsive and adaptive approach to ongoing community engagement, ensuring that engagement opportunities are accessible, inclusive, and genuinely meaningful. Continuous monitoring, evaluation, and refinement of engagement methods will be critical</p>	[APP-301]

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			throughout the project to ensure that local needs are understood and responded to effectively.	
A8.2	<b>Mental Health RR 126</b>	The Council expressed concern that greater emphasis appears to have been placed on assessing physical health than mental health. Applicant asserts relevant guidance has been followed.	<p>The Council acknowledges the applicant's commitment to applying ISEP (formerly IEMA) guidance in the assessment of health and wellbeing impacts and welcomes the recognition of mental health as a determinant within the EIA.</p> <p>However, as set out in the Council's Relevant Representations and in the Community Engagement and Wellbeing SGD, the Council's position is that the effective assessment and mitigation of health and wellbeing impacts, particularly mental health, requires a more holistic and locally responsive approach. Whilst the receptors chosen by the Applicant reflect the ISEP guidance, SCC considers that there is a lack of detail in the assessment of these receptors when considering the wide range of factors affecting mental wellbeing as identified in the ISEP guidance.</p> <p>The Council has detailed where it considers relevant considerations are either omitted or otherwise insufficiently assessed in chapter 14 of its LIR [REP1-130], such as in paragraphs 14.56, 14.57, 14.63 and 14.64. Appropriate mitigation should extend beyond procedural commitments and include practical, robust monitoring that continues beyond construction and resourced measures to</p>	[APP-058] [APP-060]

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			address adverse wellbeing impacts. This should include, for example, providing support to local mental health organisations to provide tailored and targeted support and interventions, delivery of Mental Health First Aid training to community leaders and investment in community led wellbeing initiatives. Such measures should be developed collaboratively with affected communities and adapted to their specific local needs.	
A8.3	<b>Cumulative impacts and mental health RR 127</b>	The Council encourages promoters to work collaboratively to minimise and mitigate effects to community wellbeing. Applicant asserts relevant guidance has been followed and the health and wellbeing cumulative effects assessment conclude no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes.	<p>The Council do not agree with the determinations of [APP-058] paragraph 11.11.2 that <i>there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme</i> nor with the conclusion within [APP-060] paragraph 13.4.14 <i>the health and wellbeing CEA anticipates no significant adverse effects on mental health</i>. The Council considers that the assessments do not fully recognise or address the mental health impacts associated with the scheme, including those arising cumulatively from the concentration of multiple NSIPs in Suffolk.</p> <p>SCC has set out how mental health is likely to be affected as a result of the proposed development in paragraphs 14.56 and 14.57 of its LIR [REP1-130]. The Applicant's assessments on mental health do not appear to take these considerations into account, undermining their reliability as a true representation of the likely effects on mental health</p>	[APP-058] [APP-060]

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			in a worst case scenario. The conclusions presented in paragraphs 11.11.2 and 13.4.14 of [APP-058] are considered unreasonably optimistic and do not reflect the lived reality of communities experiencing sequential and overlapping infrastructure development and the substantial pressures that are placed on wellbeing.	
A8.4	<b>Working hours RR 128</b>	The Council highlights potential for construction activities taking place within the lengthy core working hours offer communities little respite and could contribute to substantial impacts on the mental health and wellbeing of those communities. Applicant asserts relevant guidance has been followed.	<p>The Council maintains that the potential for construction activities taking place within the core working hours stated have the potential to generate significant mental health and wellbeing impacts for local communities through limited respite from construction traffic, noise, vibration, general disruption, and the cumulative pressures arising from sequential and overlapping projects in the area.</p> <p>The Council notes the Applicants intention to continue dialogue with both the District and County Council and to address the matter through thematic meetings, with the stated aim of ensuring that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management. Ongoing dialogue is welcomed, and the Council looks forward to working collaboratively to ensure that the working hours are consistent with safeguarding community wellbeing throughout the construction process.</p>	[APP-045]

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A9 - 2.13 Air Quality</b>				
A9.1	<b>Cumulative impacts and monitoring RR 127</b>	<p>Public Health are satisfied with the mitigations proposed to manage and monitor air pollution to ensure statutory legal limits are not exceeded. This is noted by the applicant.</p> <p>Concerns remain, highlighted in RR127 and expanded upon in the Local Impact Report, related to the cumulative impacts of the proposal and other concurrent developments happening in the area.</p> <p>The applicant asserts cumulative impacts have been assessed and that there are no anticipated significant effects on air quality or on health and wellbeing as a result of the Proposed Project.</p>	<p>As stated in SCC's relevant representation, Public Health will defer to East Suffolk Council on air quality matters as they are the monitoring authority, but from a Public Health perspective it is vital that the cumulative impacts of these projects and their impact on the health and well-being of local residents, particularly those residents more vulnerable to the effects of air pollution, is at the forefront of any decisions and is given the weight it deserves.</p> <p>Whilst individual reports on individual projects may conclude impacts to be 'negligible' or 'not significant' Public Health have concerns that the number of concurrent NSIPs and other major developments taking place in the same locality and temporal space will place notable pressure on the health and wellbeing of local communities through increased traffic and air pollution with little respite.</p> <p>Whilst it is acknowledged that appropriate mitigations are proposed and pollutant levels are not expected to exceed Statutory Limits it is important to recognise that there is a growing body of evidence suggesting these Statutory Limits are not enough to protect health and we would therefore like to see an emphasis on bringing</p>	REP1-130, pages 175 - 183



Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
			air pollution levels down as low as possible for the health and wellbeing of our residents.	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A10 - 2.16 Emergency Planning</b>				
A10.1	<b>Emergency Planning RR 138</b>	<p>The Applicant has been in correspondence with SCC's Emergency Planning team to discuss the emergency planning document in respect to the Proposed Project's interaction with the Suffolk Radiation Emergency Plan.</p> <p>A meeting was held on the 19 August 2024. It was agreed that the required document would be produced post DCO submission and pre commencement of construction. The Applicant plans to be in contact with Emergency Planning team early in 2026 to commence this process.</p>	<p>SCC welcomes the production of an emergency planning document to ensure that emergency planning arrangements, including the Sizewell B Off-site Radiation Emergency plan, are not compromised by the proposed development. SCC refers the Applicant to paragraphs 15.66 to 15.70 of SCC's LIR [REP1-130] which gives the Council's position on the necessity of a requirement to be included in the DCO for the production and approval of this plan prior to commencement.</p> <p>As things currently stand, the Applicant agrees that the document should be produced but the application lacks any legal mechanism requiring its production and approval. This means that the Applicant would be able to alter its position post-consent by commencing construction without any emergency plan in place. A DCO requirement for this plan to be submitted and approved prior to commencement is therefore necessary. SCC has suggested that this requirement could mirror the one included in the EA1N and EA2 DCOs referenced in paragraphs 15.69 and 15.70 of SCC's LIR [REP1-130].</p>	

Ref. No	Topic	Summary of Submission	SCC Response	Document Ref(s)
<b>Table A11 - 2.17 Draft Development Consent Order (dDCO)</b>				
A11.1	<b>Requirement 6 – query on why certain plans have not been produced as outline versions at this stage RR 144</b>	The Material and Waste Management Plan, Construction Drainage Management Plan, and Flood Management Plan have not been prepared in outline as they will be produced prior to construction	<p>The Applicant's response does not address the Council's point in relation to these management plans. SCC's submission was made in the context of the other management plans listed in Requirement 6 for which outline plans have been supplied as part of the DCO application apart from the three listed. SCC's point remains that no justification has been given for this.</p> <p>Without outline versions of these plans, little information is available to SCC and the decision maker on how appropriate mitigation is secured and what will be contained in the final approved documents. Since outline plans are deemed necessary at this stage for the other management plans listed in Requirement 6, the Applicant should explain why this exercise is not necessary for the three management plans identified by SCC.</p>	

**Section B – Comments on other documents submitted by the Applicant at Deadline 1 and 1A**

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B1 - Document 6.2.2.2 Ecology and Biodiversity (REP1-047)</b>			
B1.1	<b>Section 2.2.4 Legislation</b>	Intertidal habitats are not included in the BNG baseline. This does not account for the possibility for impacts on this habitat arising; for instance, from frack outs from HDD. SCC considers that a precautionary approach would include it in the baseline.	
B1.2	<b>Section 2.3.3 Statutory Consultation</b>	With regard to the 30-year maintenance period for habitats, this should be implemented on linear habitats such as hedgerow and river corridors. Area habitats as mitigation should also be subject to the 30-year management and monitoring period.	
B1.3		SCC is concerned that watercourse habitats do not appear to have been assessed using the River Condition Assessment? This is mandatory for river corridor BNG.	
B1.4	<b>Table 3.1 Suffolk Baseline Habitats</b>	SCC is unclear as to why there are two parcels of bracken, one low Strategic Significance, one high Strategic Significance (SS) – what is the difference in significance being put down to?	
B1.5	<b>Table 3.1 Enhanced Habitats</b>	The column headings do not appear to match up with the relevant data fields (first two column headings are repeated).	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B2 - 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (REP1-102)</b>			
B2.1	<b>Potential loss of trees</b>	<p>SCC (Landscape) welcomes the addendum A19 regarding the loss of moderate and high-quality tree features.</p> <p>With regards to A20: <i>Impacts to retained trees within W708S from proposed hedgerow planting</i>,</p> <p>Any hedgerow planting does not only need to avoid important tree roots at planting. Any actions that could cause harm to the retrained trees, in the short or long term, need to be avoided (such as creating undue competition within the root zone). This should be further clarified.</p> <p>All other comments by SCC (Landscape) with regards to measures proposed in this document still stand.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B3 - Document 9.26 Traffic and transport Cumulative Impacts (REP1-110)</b>			
B3.1	<b>Methodological concerns</b>	<p>Whilst SCC appreciates the update given on the methodology used for the cumulative effects assessment in section 2, it does not agree with certain aspects of the approach taken by the Applicant. Plate 2.1 shows that where potentially significant effects are found, the Applicant will then refine its assessment to account for the mitigation measures included in other schemes before coming to a conclusion on the magnitude of impact. This can mask potentially significant cumulative effects in the scenario that the delivery of these mitigations does not match the Applicant's assumptions in terms of delivery.</p> <p>SCC notes that the source used for peak construction traffic flows is the planning submission documents for the schemes being considered. Whilst SCC accepts that such information is useful, it is not always the most up to date information available for those schemes. It is commonplace that as projects move from the consenting phase to the implementation phase further details become available (for example through discharge of requirements applications). SCC considers that the methodology would have been more robust if the Applicant had verified with the developers of the schemes concerned whether the planning submission material remained realistic as a worst-case assessment.</p> <p>For Sizewell C, many mitigation measures for traffic and transport impacts have either not started construction or are otherwise not yet in operation. Notable examples include the Two Village Bypass and the Sizewell Link Road, both of which have not yet started construction. Whilst these measures may be operational for a substantial portion of Sea Link's construction phase, they cannot be assumed to be operational during the peak of Sea Link's construction phase for the purposes of the reasonable worst case scenario approach of this assessment. Whilst Sizewell's daily two-way HDV (HGVs plus buses) movement cap cannot rise from 600 to 750 until certain mitigation measures are</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
		<p>in place, movements of other vehicles such as workers will likely continue to rise even if the delivery of transport mitigation measures are delayed.</p> <p>Table 3.3 shows that three of the four receptors identified as having potential significant effects from this project in combination with Sizewell C are dismissed based on residual effects of Sizewell C after mitigation. This implies that Sizewell C's mitigation will be in place before Sea Link's construction phase begins which is not representative of a reasonable worst-case scenario in SCC's view. Nor should it be assumed that the mitigation delivered by others is that required by this project.</p> <p>SCC is also concerned by the methodology stated in table 2.1 in relation to the cumulative assessment covered in this technical note. The table shows that effects are scoped out from being assessed out based on magnitude of impact without undertaking any quantitative analysis. This is problematic due to the baseline data used in the assessments of cumulative schemes potentially being outdated.</p> <p>SCC's previously articulated concerns regarding the Applicant's study area for its Traffic and Transport assessment [APP-054] also apply to the cumulative effects assessment. Traffic associated with Sea Link will affect the A12 beyond that covered in the study area and will interact with traffic associated with cumulative schemes. Due to the Applicant's restricted study area, these effects have not been assessed which means these parts of the A12 may experience significant effects without mitigation.</p> <p>SCC challenged some of the sensitivities used in the Applicant's assessment in its LIR [REP1-130] such as in paragraphs 11.125, 11.159, 11.161 and paragraph 11.187 in relation to cumulative effects which apply to this technical note. Other methodological concerns detailed in SCC's LIR on the Applicant's Traffic and Transport assessment [APP-054] also have implications on the cumulative effects assessment. It would be worthwhile for the Applicant to consider the sensitivities determined by other applicants for schemes consented by the Secretary of State.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
B3.2	<b>Lack of quantitative analysis</b>	<p>There is a lack of quantitative analysis throughout the document regarding numbers of vehicle movements of cumulative schemes. The Applicant's methodology, as explained in section 2.1, is based on traffic flows for cumulative schemes in combination with the proposed project before coming to a conclusion on the magnitude of potential effects. However, details of cumulative traffic volumes at shared receptors compared to the baseline are not given. Only the magnitude of potential effects are. This means that SCC as the Local Highway Authority for Suffolk cannot confirm that the conclusions reached by the Applicant on magnitude of impact are robust in relation to the cumulative increase in vehicle movements.</p> <p>The increase in vehicle movements must also be compared to up-to-date baseline data which has changed since the production of the Environmental Statements for the cumulative schemes. This further demonstrates the need for quantitative analysis since changes in the baseline are not accounted for in conclusions of magnitude of impact from cumulative schemes which have been used in the Applicant's. Whilst the baseline is changing as construction traffic varies with time the consented projects are committed to providing reports that contain data that can be used to disaggregate their impact to a degree.</p>	
	<b>Lack of total cumulative effects assessment</b>	<p>The technical note lacks quantitative detail on impacts associated with the total vehicle movements from each project in combination on shared receptors. This lack of detail means SCC is unable to analyse the total cumulative effects arising from all projects in combination on shared receptors.</p> <p>The lack of such an assessment is a critical flaw in the assessment's methodology since effects considered to be not significant may become significant when cumulative schemes are assessed together. This applies not only to the effects on receptors considered in the assessment but also to the initial scoping process for effects to be assessed cumulatively, as this was undertaken on an</p>	



Ref. No	Topic	SCC Response	Document Ref(s)
		<p>individual basis for cumulative schemes. Therefore, SCC cannot be confident that significant cumulative effects will not occur when considering the effects of cumulative schemes together.</p> <p>Paragraph 6.1.1 states that the peaks of construction traffic should be assumed to overlap with Sea Link's peak in an assessment of a reasonable worst-case scenario. SCC does not consider this statement to be reflected in this technical note given the lack of assessment of total cumulative effects. SCC notes that consideration of total cumulative effects has been given in Table 13.41 of [APP-060]. There, however, the Applicant states that the low likelihood for project peaks to overlap is a relevant factor in determining that total effects are not significant which appears to diverge with what the Applicant claims to be the worst-case scenario. Such divergence undermines the Rochdale Envelope approach since a scenario which is not the worst case is being referred to justify a lack of significant effects in the worst case. This is important because numbers of vehicle movements for cumulative schemes may remain high outside of their peak, especially for Sizewell C.</p>	
	<b>Insufficient mitigation</b>	<p>SCC considers there to be inadequate provision for mitigation should significant cumulative effects arise or where embedded in the project robust controls to ensure they are effective. The Applicant has not committed to reduce its own vehicle movements were peaks of other projects to overlap; rather, it states that "<i>potential cumulative effects may be able to be mitigated by seeking to manage construction peaks of the Proposed Project within overlapping construction programmes.</i>" Section 6.3 lists opportunities for coordination with other projects as potential mitigation. Whilst SCC welcomes the Applicant's willingness to seek to minimise impacts and coordinate with other projects, no mitigation is proposed should these endeavours prove unfeasible during delivery. It should be noted that for any mitigation measure to be enforceable, it must be required by the DCO such as through the approval of a control document.</p>	
	<b>Appendix B Cumulative Scheme Peak</b>	<p>There is no reference to the source of the data used in Appendix B which appears to form the basis of the Applicant's assessment. Two assessments for Sizewell C are referenced in the "References" section of the document, but it is not specified which is used as the source for the data in Appendix</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
	<b>Traffic Flows</b>	<p>B. In terms of HDVs (HGVs plus buses), these numbers are capped in the CTM&amp;TP for Sizewell C both in total and for individual receptors which should form the worst-case scenario in this regard.</p> <p>Without reference to how the Applicant arrived at the figures cited in Appendix B, SCC cannot comment on the accuracy or validity of the data within Appendix B Cumulative Scheme Peak Traffic Flows. For example, the SZC peak construction traffic flows for S-RL1 A12 S of A1094 seem significantly less than understood by SCC (i.e. 85% of 600 early years daily HDV cap = 510 HGV movements not 173). SCC will be able to provide further comments once the sources of the data used by the Applicant in this assessment has been confirmed.</p> <p>The tables of data for EA1N and EA2 do not include any figure of HGVs at the AM Peak or PM Peak without any explanation for the lack of such data. Lion Link is stated as have 0 HGVs during these times. Whilst SCC recognises the lack of data for this project given its stage in the planning process, a reasonable worst-case scenario would not assume that HGVs at peak hours would be 0. The Council hopes that when information is provided by Lion Link as part of their forthcoming statutory consultation in 2026, this is considered by the Applicant in its assessment. It is also not clear what metric is being used for the numbers included in the column titled “Daily (12hr/24hr)” as these two definitions of daily movements may yield different results.</p>	
	<b>Appendix C Duration of Effect – Worked Example based on Hypothetical Projects and</b>	<p>Whilst SCC appreciates that the exercise in this Appendix is stated as purely hypothetical, its assumptions do not reflect the projects involved in the cumulative effects assessment. By consequence, SCC does not see how any conclusions reached on this basis could inform conclusions reached in the cumulative effects assessment as is claimed in paragraph C1.8. Specifically, there are several discrepancies between the scenario modelling and the projects assessed elsewhere in the technical note. These include assumptions of project lengths being equal and numbers of vehicle movements to distribute as a bell curve, both of which are particularly untrue for Sizewell C where controls on HGVs creates a stepped profile. There is also potential for projects</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
	<b>Scenarios</b>	<p>to have multiple peaks such as for installation and removal of haul roads. SCC raised the point in its LIR [REP1-130] that the SPR projects could have multiple peaks such as during the removal of the haul road which is not captured in the Applicant's modelling.</p> <p>It is stated in Appendix C that 500 vehicle movements is the threshold for a large magnitude of change. Paragraph C1.9 clarifies that "<i>the potential cumulative effect would nonetheless be Minor / Moderate if both the example project, and the cumulative project(s) are expected to be Minor in isolation.</i>" SCC does not see how the magnitude of effect can be altered depending on whether the effect is caused by a project in isolation or in combination if in either case the number of vehicle movements are equal.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B4 - Document 9.45 Approach to Assessment Public Rights of Way (REP1-119)</b>			
B4.1	<b>The lack of a standalone PRow chapter in the ES</b>	<p>Paragraph 3.1.4 states that is not conventional practice for an ES topic chapter for a standalone PRow assessment. SCC has asked for this in all correspondence, and it is contained in SCC's NSIP guidance. The examples of previous projects cited in this paragraph does not mean that the approach is best practice. It is understood that the DMRB and other guidance may not yet request the assessment of PRows to be its own ES chapter.</p> <p>However, a separate chapter would allow the assessment and its findings to be communicated with far greater clarity than the current sporadic approach spanning many documents allows. By consequence, IPs would be able to participate more effectively in this regard through improved accessibility to the assessment and its findings. This point not only applies to local authorities and other organisations registered as IPs but is also especially pertinent to IPs registered as individuals, such as members of the public, who already face barriers to effective engagement on account of the large quantity of technical documents forming the application and the amount of time needed to do so.</p>	
B4.2	<b>Request for new PRow route north of the Converter Station site</b>	<p>Paragraph 3.2.2 mentions the requested mitigation from SCC PRow regarding a new PRow route to the north of the converter station and to the south of the B1119 and that they are not included as mitigation in the DCO. SCC PRow considers this is mitigation for the visual impact and amenity and the permanent closure and diversion of the Public Footpath due to the location of the Saxmundham Converter Station.</p> <p>The landscape and views will be significantly altered from open farmland to large industrial buildings and infrastructure with some planting. A new route away from the built form will also be beneficial to PRow users whilst temporary diversions and closures are in place, which may impact on user behaviour if the diversions are not desirable or commensurate to the existing routes. This northern route would also create an off-road link to existing PRows and footways</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
		<p>to encourage use by non-motorised users for health, wellbeing and recreation and a safer off-road route for commuting.</p> <p>Sizewell C produced an “Amenity &amp; recreation” assessment, ES Volume 4 Chapter 8 Amenity and Recreation, which considers the effects on the experience of users of amenity and recreation resources as a result of:</p> <ul style="list-style-type: none"> <li>• <i>physical changes to resources (for example changes to PRow through diversions or creation of new road crossings).</i></li> <li>• <i>changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, or traffic movements; and</i></li> <li>• <i>changes to the experience people have when using recreational resources due to increases in the numbers of people using them.</i></li> </ul> <p>Therefore, SCC PRow considers that it has been established that the loss of amenity for PRow users such as due to walking around new buildings instead of open countryside is an effect which must be considered and mitigated appropriately.</p>	
B4.3	<b>Requested enhancement to the PRow network</b>	Regarding paragraph 3.2.3, SCC PRow welcomes the engagement on the other requests to enhance the PRow network and would request that this is discussed and agreed at the earliest opportunity.	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B5 - S.85 Technical Note</b>			
B5.1	<b>Acid grassland enhancement</b>	<p>Whilst SCC considers the enhancement of acid grassland to be an appropriate measure which seeks to further the purposes of the natural beauty of the SECHNL, it is unlikely that the proposal in its current form will be sufficient to allow the duty to be discharged. As pointed out in paragraphs 5.46 to 5.56 of SCC's LIR [REP1-130], the project's impacts on the SECHNL go beyond affecting only acid grassland meaning the position set out in paragraphs 5.57 and 5.58 remains unchanged. In addition to these impacts, table 4.1 finds that there are likely significant cumulative effects on the following natural beauty indicators: Landscape Quality, Scenic Quality, Relative Wildness and Relative Tranquillity. No measures are proposed in relation to these effects which means the duty cannot be discharged in this regard either.</p> <p>SCC recognises that effects beyond acid grassland removal affect a limited area of the SECHNL and are temporary in nature. It is therefore likely that additional activities need only be modest in scope to allow the duty to be discharged. This could be achieved through additional measures or a contribution to existing nature recovery funds ringfenced for environmental enhancements in proximity to the works within the SECHNL.</p> <p>Regarding the acid grassland proposal itself, paragraph 3.3.6 of the Statement of Reasons [REP1-040] states that the acid grassland enhancement "<i>is required to offset the temporary loss of acid grassland habitat during the construction of the transition joint bays, and the associated recovery period</i>". Paragraph 3.3.7 clarifies that the 10-year management period is required "<i>to offset the lag time in restoration of the existing acid grassland that can be expected once the transition joint bays compound and cable trench works are complete</i>". The proposed enhancement is required to offset the harm caused by the project to acid grassland within the SECHNL. Offsetting is required where impacts cannot be avoided or mitigated according to the mitigation hierarchy. Even if the proposal is sufficient to offset effects on acid grassland, it does not follow that it therefore shows compliance with the duty on account of the requirement to seek to <i>further</i> the purposes of conservation and</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
		<p>enhancement of natural beauty. The Applicant must demonstrate that the measure does not only offset effects on acid grassland but also furthers its status in relation to the National Landscape's natural beauty.</p> <p>When considering whether the proposal succeeds in furthering conservation and enhancement of the SECHNL's natural beauty in terms of acid grassland, it should be noted that the proposal does not increase the amount of acid grassland through creation, as was previously proposed in para 7.3.21 of the Planning Statement [AS-030], but enhances existing acid grassland.</p> <p>This change lessens the benefits of the proposal by no longer increasing the provision of acid grassland and means that there will be a temporary deficit of 7.61 ha of acid grassland for several years until the existing grassland is restored. As a result, is not clear to SCC that the proposal goes beyond the required offsetting for impacts on acid grassland in terms of balancing the temporary reduction of acid grassland provision with the benefits of enhanced acid grassland once affected grassland is reinstated. Therefore, it is doubtful that the proposal is sufficient to discharge the duty, both in relation to effects on acid grassland and, most certainly, in relation to the other impacts of the proposed development on the SECHNL as previously referenced.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B6 - Document 9.50 Cumulative Vehicle Emissions Assessment (REP1-123)</b>			
B6.1	<b>Table 2.4</b>	<p>In Table 2.4, page 8, of this document, the highest predicted NO<sub>2</sub> level is at R1 with an annual mean of 16.3. This is compliant with the Statutory Air Quality Objectives but is 4 times higher than WHO guidelines. PM<sub>2.5</sub>, which is the most harmful to human health, is predicted again to be highest at R1, at 8.7 (annual mean) which again is compliant with the Statutory AQ Objective of 20mg annual mean but is higher than the WHO guidelines of 5mg.</p> <p>Whilst it is acknowledged that appropriate mitigations are proposed and pollutant levels are not expected to exceed Statutory Limits, it is important to recognise that there is a growing body of evidence suggesting these Statutory Limits are not enough to protect health or guarantee that no significant effects on human health would occur. SCC would therefore like to see an emphasis on bringing air pollution levels down as low as possible for the health and wellbeing of affected residents.</p>	



Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B7 - Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 (REP1-296)</b>			
B7.1	Visualisations	<p>SCC welcomes the refined massing provided for the visualisations, acknowledging that this is not the final design.</p> <p>SCC would ask for clarification with regards to some elements of the rendition in Viewpoint 1:</p> <p>SCC assumes that the brown and grey shapes in the background (towards Friston) are representations of elements of the Kiln Lane (Friston) substation works, but would welcome this being confirmed, including identification of the relevant Works Numbers, so that the visualisations can be related to the works plans/general arrangement plans.</p> <p>SCC considers that the visualisation of Viewpoint 1 in year 15 clearly demonstrates, why a layered approach to mitigation and screen planting is required to successfully integrate the converter station site into its surroundings. If the field north of the converter station site had been retained within the DCO limits (see paragraph 5.85, SCC LIR [REP1-130]), additional planting could have been provided in the middle ground, screening the converter station after 15 years.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B8 - Document 9.48 River Fromus Visualisations Part 1 of 3 [REP1-298]</b>			
B8.1	Visualisations	<p>SCC welcomes the additional visualisations and refined rendering and considers that this adds to the wider picture, even if it does not complete it. The focus is (rightly) on the Fromus Valley, the bridge, the converter station in the background and the relationship to listed assets.</p> <p>What is left out are the impacts and effects of the access from the B1121 to the proposed bridge. At a speed limit of 60mph, the required visibility splays could extend to over 200m either side (please consult SCC Highways). It is not clear whether this is reflected in Viewpoint 2, which does show roadside hedge.</p> <p>Apart from the bell mouth construction and associated required visibility splays in the approach to the bridge, the bridge construction would alter the landform within the Fromus Valley, which '<i>would directly change a small part of the distinctive valley system</i>' (as identified in the ES [APP-143]). As stated at paragraph 5.73 of the SCC LIR [REP1-130], the land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018).</p> <p>The adverse visual effects of this become more pronounced as the clearance height of the bridge increases.</p> <p>SCC further considers that, taking into account all impacts and effects of this approach to the converter station site, even a lower bridge clearance height will not make the overall access (including bell mouth, visibility splays, access road towards bridge and between bridge and converter station site) acceptable.</p> <p>SCC therefore maintains its position that this access should be temporary.</p>	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B9 - Document 9.48 River Fromus Visualisations Part 2 of 3 (REP1-299)</b>			
B9.1	Visualisations	Viewpoint A demonstrates that the bridge with 6m clearance would remain visible after 15 years.	

Ref. No	Topic	SCC Response	Document Ref(s)
<b>Table B10 - Document 9.48 River Fromus Visualisations Part 3 of 3 (REP1-300)</b>			
B10.1	Visualisations	SCC welcomes that the bridge (at any height would largely be screened) from Viewpoints B and C. Viewpoint B demonstrates however, how the access road would visibly cut across the former parkland landscape.	

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
<b>Table B11 – SCC’s Comments on the Applicant’s Schedule of Changes (REP1-107)</b>				
B11.1	Art.1	Natural England’s Relevant Representation advised that the definition of ‘commence’ within article 1 of the draft DCO should be updated to include the definition of offshore commencement. Article 1 of the draft Order has therefore been updated to reflect both definitions of ‘commence’ currently used within the draft DCO and in the Schedule 16 deemed marine licence for consistency purposes. An associated definition of Mean High Water Springs is also added to Article 1.	<p><u>“commence” means</u></p> <p>(a) <u>In relation to works seaward of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licence, save for operations consisting of offshore preparation works or pre-construction surveys and monitoring approved under the deemed marine licence and the words “commencement” and “commenced” must be construed accordingly.</u></p> <p><del>“commence” means</del> <u>In respect of any other works comprised in the authorised project,</u> the carrying out of any material operation (as defined in section 155(2) (when development begins) of the 2008 Act) forming part of the authorised project other than the pre-commencement operations and “commencement” and “commenced” are to be construed accordingly;”</p>	<p>SCC has three drafting comments –</p> <p>First, the similar text regarding “commencement” and “commenced” which is included at the end of sub-paragraphs (a) and (b) only needs to be included once, i.e. at the end of the definition.</p> <p>Second, SCC consider that, for clarity, in sub-paragraph (b), the reference to “pre-commencement operations” is changed to “onshore pre-commencement operations” and that follow-up amendments are made throughout the draft DCO.</p> <p>Third, after sub-paragraph (a), “In relation” should be replaced with “in relation” and, after sub-paragraph (b), “In respect of” should be replaced with “in respect of.”</p> <p>Taken together, these points would result in the following amendments to the definition of “commence” –</p> <p>“commence means” —</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p>(a) <del>in</del> <a href="#">in</a> relation to works seaward of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licence, save for operations consisting of offshore preparation works or pre-construction surveys and monitoring approved under the deemed marine licence <del>and the words “commencement” and “commenced” must be construed accordingly.</del></p> <p>(b) <del>in</del> <a href="#">in</a> respect of any other works comprised in the authorised project, the carrying out of any material operation (as defined in section 155(2) (when development begins) of the 2008 Act) forming part of the authorised project other than the <a href="#">onshore</a> pre-commencement operations <del>and “commencement” and “commenced” are to be construed; accordingly,</del></p> <p><a href="#">and “commencement” and “commenced” are to be construed accordingly.</a></p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				If these amendments were made, the definition of “commence” would be consistent with the definition of “commence” included in article 2(1) (interpretation) of the East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432).
B11.2	Art. 5	This change is made to alter the secured height of pylons in Suffolk to 53.2m. This means that, with the 6m limit of deviation in Article 5, the total maximum height for pylons in Suffolk would be 59.2m to match the East Anglia One North and East Anglia Two Windfarm Orders 2022. Detailed design has progressed against the parameters of these consents, and the Applicant is therefore confident the lower height is deliverable.	<b>Limits of deviation</b>  5. — (1) Subject to paragraph 4, in respect of the onshore and offshore electric line forming part of the authorised project for which it is granted development consent by paragraph (1) of article 3 (development consent etc. granted by the Order), the undertaker may—  (a) deviate from the lines or situations of the authorised project shown on the Works Plans within the limits of deviation relating to a Work shown on those plans and carry out construction activities for the purpose of the authorised project anywhere within the Order limits; and	SCC makes no comment on this amendment. On reflection, however, SCC considers article 5(1)(a) should be recast, for clarity, as follows –  “5.— (1) Subject to paragraph 4, <a href="#">the undertaker may</a> —  <a href="#">(a)</a> in respect of the onshore and offshore electric line forming part of the authorised project for which it is granted development consent by paragraph (1) of article 3 (development consent etc. granted by the Order), <del>the undertaker may—</del> <del>(a)</del> deviate from the lines or situations of the authorised project shown on the Works Plans within the limits of deviation relating to a Work

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments									
			<p>(b) in respect of the pylons deviate vertically from the levels of the authorised project (being <del>54m</del><u>53.2m</u> above finished ground level in Suffolk and 51m above finished ground level in Kent)—</p> <p>(i) to any extent upwards not exceeding 6 metres.</p> <p>(ii) to such extent downwards as the undertaker considers necessary or convenient.</p>	<p>shown on those plans and carry out construction activities for the purpose of the authorised project anywhere within the Order limits;” <del>and</del></p> <p>In addition, at the end of paragraph (c), after “convenient,” add “and.”</p>									
B11.3	Art.5	The height of Friston substation assessed in the Sea Link application is 2m higher than the height assessed in the East Anglia One North and East Anglia Two Windfarm Orders 2022. The Environmental Statement for the Sea Link application assessed a height of 18m above finished ground level, and this is the height shown in the photomontages in the application. However, National Grid (working with SPR as part of	<table><tr><th colspan="3">Table of Parameters</th></tr><tr><th>Work</th><th>Type of structure</th><th>Height</th></tr><tr><td>1B</td><td>Substation – Suffolk</td><td><del>18m</del><u>16m</u> above finished ground level (not including roof</td></tr></table>	Table of Parameters			Work	Type of structure	Height	1B	Substation – Suffolk	<del>18m</del> <u>16m</u> above finished ground level (not including roof	Notwithstanding the proposed amendment, SCC’s maintain its comments in its LIR <b>[REP1-130]</b> on the impacts of Friston substation. These include impacts on landscape (see paragraphs 5.103 and 5.104 and 5.146 to 5.148), archaeology (paragraph 7.47), flood risk associated with the substation’s construction and operation (paragraph 8.32 onwards), and the need for more information regarding vehicular movements during its construction, particularly AILs (paragraph 11.155).
Table of Parameters													
Work	Type of structure	Height											
1B	Substation – Suffolk	<del>18m</del> <u>16m</u> above finished ground level (not including roof											

Ref. No	dDCO Ref	Rationale for Change	Change Made			SCC Comments
		the delivery of the East Anglia TWO Windfarm Order 2022) has now progressed the design to the 16m maximum height specified in the SPR consents. Therefore, this update is made to secure this lower height in the draft DCO.			mounted equipment)	
B11.4	Art.7	In its Relevant Representation, the MMO noted concerns around the provisions relating to the process of transferring or granting the deemed marine licence. Therefore, the applicant has included additional wording which is based on the East Anglia One North and East Anglia Two Windfarm Orders 2022 and other DCOs which consented offshore wind farms to include wording requiring the Secretary of State to consult with the MMO before giving consent to the transfer or grant of the benefit of the provisions of the DML. The MMO will be consulted on any decision	<p><u><a href="#">“(4) Subject to paragraph (5) the undertaker may with the written consent of the Secretary of State</a></u></p> <p><u><a href="#">(a) Where an agreement has been made in accordance with paragraph 2(a), transfer to the transferee the whole of any of the deemed marine licences and such related statutory rights as may be agreed between the undertaker and the transferee; or</a></u></p> <p><u><a href="#">(b) Where an agreement has been made in accordance with paragraph 2(b), transfer to the lessee for the duration of the period mentioned in paragraph 2(b), the whole of any of the deemed marine licences and such related statutory rights as may be so agreed.</a></u></p>			<p>SCC has one drafting comment: in paragraph (4), after both (a) and (b), replace “Where” with “where”.</p> <p>In addition, SCC maintains the point (subject to one drafting change shown below) made in respect of this provision in paragraph 15.8 of its LIR <b>[REP1-130]</b>, namely –</p> <p>“This article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable <u><a href="#">of any such transfer</a></u> and that the dDCO is updated to reflect this.”</p>



Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
		by the SoS, and it is well preceded across other Orders.	<p><a href="#">(5) The Secretary of State must consult the MMO before giving consent to the transfer or grant to another person of the benefit of the provisions of the deemed marine licence.</a></p> <p><a href="#">(6) Sections 72(7) and (8) of the 2009 Act (variation, suspension, revocation and transfer) do not apply to a transfer or grant of the whole of the benefit of the provisions of the deemed marine licences to another person by the undertaker pursuant to an agreement under paragraph (3) save that the MMO may amend any deemed marine licence granted under Schedule 16 (Deemed marine licence) of the Order to correct the name of the undertaker to the name of a transferee or lessee under this article 7 (consent to transfer benefit of the Order)”.</a></p>	
B11.5	Art. 62	In their Relevant Representations, the MMO and Natural England highlighted that the MMO should not be subject to the arbitration provisions in the Draft DCO.	<p><b>Arbitration</b></p> <p>62. <a href="#">(1)</a>Subject to article 55 (procedure regarding certain approvals, etc.) and except where otherwise expressly provided for in this Order or unless otherwise agreed between the parties, any difference under</p>	SCC has one drafting point: in paragraph (b), the words “For the avoidance of doubt” are unnecessary and should be omitted.

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
		The Applicant notes the arguments made in relation to arbitration provisions on other development consent orders. Therefore, this change updates the wording as requested by the MMO and Natural England.	any provision of this Order must be referred to and settled by a single arbitrator to be agreed between the parties or, failing agreement, to be appointed on the application of either party (after giving notice in writing to the other) by the Secretary of State.  <a href="#">(2) For the avoidance of doubt, any matter for which the consent or approval of the Secretary of State or the MMO is required under any provision of this Order is not subject to arbitration.</a>	
B11.6	Sch. 1	The Applicant has agreed to provide a new version of the Works Plans to help the Examining Authority and Interested Parties understand the proposed use of land outside the previous principal numbered works. The approach taken to the Works Plans previously was to show all principal works on the Works Plans but generally not Associated Development such as PRoW diversions, landscaping,	<a href="#">In all Districts within the Order Limits Works 13-17 as shown within the areas indicated on the Works Plans.</a>  <a href="#">Work No. 13 – Principal Drainage Works</a> <a href="#">Work No. 14 – Principal Accesses</a> <a href="#">Work No. 15 – Principal Environmental Mitigation and Landscaping</a>  <a href="#">Environmental mitigation includes works identified in the Environmental Statement and/or the management plans listed in</a>	SCC assumes the reference to “requirement 16” should be to “requirement 6 (construction management plans to be approved”.  SCC will consider the new version of the Works Plans and comment as appropriate in due course.

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
		<p>ecological mitigation areas, utility diversions etc.</p> <p>The numbered works are mostly the permanent electrical assets and their accesses, and temporary works compounds. The Applicant will be providing a version of the Works Plans which more closely mirrors the approach taken by SPR and to provide additional detail available on other plans, in the Works Plans (e.g. where land is required for environmental mitigation). Therefore, Schedule 1 has been updated to include further works numbers (but no new works) which reflect the updated Works Plans.</p>	<p><a href="#">Schedule 3, Requirement 16, which may include —</a></p> <p><a href="#">(a) ecological mitigation and enhancement; and</a></p> <p><a href="#">(b) landscaping mitigation and enhancement.</a></p> <p><a href="#">Work No. 16 – Principal Utility Diversions</a></p> <p><a href="#">Work No. 17 – Principal Public Right of Way Diversions</a></p>	
B11.7	Sch. 2 Part 2	This change reflects the updates to the version numbers of the Land Plans and Works Plans submitted at Deadline 1.	[Revision numbers changed for certain plans].	SCC makes no comment on this amendment.
B11.8	Sch. 2 Part 6	This change reflects the updates to the version numbers of the Works Plans submitted at	[Revision numbers changed for certain plans].	SCC makes no comment on this amendment.

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
		Deadline 1.		
B11.9	Sch. 3 Req. 3	This update is made for clarity as to which documents contain the Converter Station Design Principles.	3. No stage of development of the above ground elements of the authorised development comprised in Works Nos. 3B and 9B (Suffolk and Kent converter stations) may commence until details of the layout, scale and external appearance have been submitted to the relevant planning authority, and the relevant planning authority has confirmed, in consultation with the relevant county council, that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles <a href="#">as presented in Document 7.12.1 Design Principles – Suffolk and Document 7.12.2 Design Principles – Kent</a> .	<p>Notwithstanding the proposed amendment, SCC maintains its position (and suggested drafting amendment) included in paragraphs 15.38 and 15.39 of its LIR <b>[REP1-130]</b> –</p> <p>“15.38 Requirement 3 refers to “the Key Design Principles set out in the Converter Station Design Principles”. What is the status of the documents which include the Design Principles (Suffolk: [APP-366], Kent: [APP-367])? Neither is referred to elsewhere in the dDCO and SCC would suggest they should be defined and included in the schedule of certified documents. SCC would therefore suggest that existing requirement 3 is renumbered paragraph (1) and a new paragraph (2) is included in requirement 3 which includes a definition of the document e.g. –</p> <p>“(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60 (certification of documents) by the</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p>Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order”.</p> <p>15.39 In Schedule 19 (certified documents) to the dDCO, “Design Principles –Suffolk” and “Design Principles – Kent” should then be added to the list of documents”.</p>
B11.10	Sch. 3 Req. 7	The construction working hours have been amended in respect of Work No.1A and Work No.1B to reflect the construction working hours secured in the East Anglia One North and East Anglia Two Windfarm Orders 2022 to ensure consistency across the projects.	<p><u>“(7) In respect of Work No.1A and Work No. 1B, construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).</u></p> <p><u>(8) Outside the hours specified in sub-paragraph (7), construction work may be undertaken for essential activities including but not limited to—</u></p> <p><u>(a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring and the installation and removal of</u></p>	<p>Paragraph 14.60 of SCC’s LIR <b>[REP1-130]</b> considers Scenario 2 and states, given the consented hours for construction work set out in the East Anglia One North and East Anglia Two</p> <p>Windfarm Orders 2022, there is no justification for works associated with Scenario 2 to require extended working hours. In that context, SCC considers this amendment to Requirement 7 is preferable to the position included in the previous dDCO.</p> <p>SCC’s wider point on construction hours is set out in paragraphs 15.47 to 15.56 of the LIR <b>[REP1-130]</b>. For the avoidance of doubt,</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<p><u>conductors, pilot wires and associated protective netting across highways or public footpaths.</u></p> <p><u>(b) internal fitting out works associated with the substation.</u></p> <p><u>(c) the completion of construction activities commenced during the approved working hours which cannot safely be stopped.</u></p> <p><u>(d) the testing or commissioning of any electrical plant installed as part of the authorised development; and</u></p> <p><u>(e) activity necessary in the instance of an emergency where there is a risk to persons or property.</u></p> <p><u>(9) With the exception of activities undertaken in accordance with sub-paragraph (2)(e), the timing and duration of construction work undertaken in accordance with sub-paragraph (8) and, where works do not fall within sub-</u></p>	<p>it is the position articulated in those paragraphs that SCC considers should be included in Requirement 7. This would result in consistent working hours across the project, and This would result in Requirement 7 being drafted as follows –</p> <p><i>Construction hours</i></p> <p>7.—(1) Subject to sub-paragraphs (2), (3), <u>and</u> (4) <del>and (7)</del> onshore construction work may only take place between 0700 and 1900 Monday to Friday and between <del>0700</del> <u>0800</u> and <del>1700</del> <u>1300</u> on Saturdays, <del>Sundays and Bank Holidays (the core working hours);</del> unless otherwise approved by the relevant planning authority.</p> <p>(2) <del>Percussive piling works are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant planning authority. No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant planning authority.</del></p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<p><u>paragraphs (2)(a) to (2)(e), whether such works are essential, must be approved by the relevant planning authority in writing in advance, and must be carried out within the approved time”.</u></p>	<p>(3) Subject to sub-paragraph (4), <u>no</u> HGV deliveries <del>are limited to</del> <u>may be made outside the hours of</u> 0700 to 1900 Monday to Friday and <del>0700 0800 to 1700 1300</del> on Saturdays <del>and may not occur on Bank Holidays</del>, unless otherwise approved by the relevant highway authority.</p> <p>(4) The following operations may take place outside the core working hours referred to in sub-paragraph (1)—</p> <p><del>(a) trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses.</del></p> <p><del>(b)</del> <u>(a)</u> the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines, or watercourses.</p> <p><del>(c)</del> <u>(b)</u> the jointing of underground cables.</p> <p><del>(d)</del> <u>(c)</u> the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused.</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p><del>(e)</del> <u>(d)</u> delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours.</p> <p><del>(f)</del> <u>(e)</u> the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities.</p> <p><del>(g)</del> <u>(f)</u> the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities <u>that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1).</u></p> <p><del>(h)</del> <u>(g)</u> activity necessary in the instance of an emergency where there is a risk to persons or property.</p>



Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p><del>(h)</del> <a href="#">(h)</a> marine works (all works below the mean high water springs line).</p> <p><del>(i)</del> <a href="#">(i)</a> security monitoring.</p> <p><del>(j)</del> <a href="#">(j)</a> intrusive and non-intrusive surveys.</p> <p><del>(k)</del> <a href="#">(k)</a> mechanical and electrical installation works within buildings once erected and enclosed; and</p> <p><del>(m)</del> <a href="#">(l)</a> any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours.</p> <p>(5) The core working hours referred to in sub-paragraph (1) exclude start up and close down activities up to 1 hour either side of the core working hours. <a href="#">A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours.</a></p> <p>(6) The severe weather conditions referred to in sub-paragraph (4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p>reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access, wind or otherwise) or being contrary to safe working practices.</p> <p>(7) In respect of Work No.1A and Work No. 1B, construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in subparagraph (8).</p> <p><del>(8) Outside the hours specified in subparagraph (7), construction work may be undertaken for essential activities including but not limited to—</del></p> <p><del>(a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths.</del></p> <p><del>(b) internal fitting out works associated with the substation.</del></p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				<p><del>(c) the completion of construction activities commenced during the approved working hours which cannot safely be stopped.</del></p> <p><del>(d) the testing or commissioning of any electrical plant installed as part of the authorised development; and</del></p> <p><del>(e) activity necessary in the instance of an emergency where there is a risk to persons or property.</del></p> <p><del>(9) With the exception of activities undertaken in accordance with sub-paragraph (2)(e), the timing and duration of construction work undertaken in accordance with sub-paragraph (8) and, where works do not fall within sub-paragraphs (2)(a) to (2)(e), whether such works are essential, must be approved by the relevant planning authority in writing in advance, and must be carried out within the approved time.</del></p>
B11.11	Sch. 3 Req. 15	This new requirement has been included to clarify that if part of Work No. 1B has been completed pursuant to the East Anglia One	<p><a href="#"><i>Restriction on carrying out works when consented in another order</i></a></p> <p><a href="#"><i>15. Where any part of Work No.1B has been completed pursuant to another</i></a></p>	<p>SCC would welcome further information in respect of this provision. For instance –</p> <ol style="list-style-type: none"> <li>1. Except in new requirement 15, in the dDCO <b>[REP1-037]</b> “amendment” is</li> </ol>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
		North and East Anglia Two Windfarm Orders 2022, it will not be constructed pursuant to the draft DCO save where amendments to those works are required for the Purposes of the Authorised Project, to ensure consistency between the projects.	<a href="#">development consent order, those works must not be constructed under this Order, save where amendments to those works are required for the purposes of the Authorised Project.</a>	<p>used in the context of a change to a plan, or document and not in the context of works. What, in this context, would constitute an “amendment” to works?</p> <p>2. How would the “amendments to ... works” differ from those works which are included in the definition of “maintain”?</p> <p>3. Should Requirement 15 include a second paragraph along the following lines –</p> <p style="padding-left: 40px;">b. “(2) No amendment to any part of Work No.1B may be constructed unless the undertaker demonstrates to the satisfaction of the relevant planning authority that the amendment will not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement”. If not, why not?</p> <p>Finally, a drafting point: for consistency with the rest of the dDCO <b>[REP1-037]</b>,</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
				“Authorised Project” should be recast as “authorised project”.
B11.12	Sch. 3 Req. 6 DML	Further to Natural England’s Relevant Representation, certain management plans listed in Requirement 6 related exclusively to impacts and works in the marine environment. Therefore, to avoid potential unnecessary duplication, the relevant plans have been removed from the requirement and are instead secured through the deemed marine licence. The list of management plans is also updated to reflect that an Operational Drainage Management Plan’ will be submitted.	<p>6. — (1) No stage of the authorised development may commence until, for that stage, the following plans as relevant to that stage have been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme, or strategy concerned—</p> <p>(a) Onshore Construction Environmental Management Plan (which must be substantially in accordance with the Onshore Outline Construction Environmental Management Plan).</p> <p><del>(b) Offshore Construction Environmental Management Plan (which must be substantially in accordance with the Outline Offshore Construction Environmental Management Plan):</del></p> <p><del>(b)</del> <del>(c)</del> Construction Traffic Management and Travel Plan – Suffolk</p>	<p>SCC makes no comment in respect of the deletion of the marine environment plans from Requirement 6.</p> <p>Notwithstanding the proposed amendment, SCC maintains its position (and suggested drafting amendment) included in paragraphs 15.45 and 15.46 of its LIR <b>[REP1-130]</b> –</p> <p>“15.45 Again, for clarity, the reference to “or other discharging authority as may be appropriate to the relevant plan” should be replaced with the name of the authority the Applicant has in mind. For instance, the subject matter of the following documents fall within SCC’s statutory responsibilities, and it would be appropriate for SCC to approve these –</p> <p><del>(c)</del> <del>(b)</del> Construction Traffic Management and Travel Plan – Suffolk (which must be substantially in accordance with the Outline</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<p>(which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan – Suffolk).</p> <p><del>(c)</del> <del>(e)</del> Construction Traffic Management and Travel Plan – Kent (which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan – Kent).</p> <p><del>(d)</del> <del>(e)</del> Air Quality Management Plan – Suffolk (which must be substantially in accordance with the Outline Air Quality Management Plan – Suffolk).</p> <p><del>(e)</del> <del>(f)</del> Air Quality Management Plan – Kent (which must be substantially in accordance with the Outline Air Quality Management Plan – Kent).</p> <p><del>(f)</del> <del>(g)</del> Landscape and Ecological Management Plan (LEMP) – Suffolk (which must be substantially in accordance with the Outline LEMP – Suffolk)</p>	<p>Construction Traffic Management and Travel Plan – Suffolk).</p> <p><del>(k)</del> <del>(j)</del> Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk).</p> <p><del>(q)</del> <del>(n)</del> Material and Waste Management Plan.</p> <p><del>(r)</del> <del>(o)</del> Construction Drainage Management Plan; and</p> <p><del>(s)</del> <del>(p)</del> Flood Management Plan</p> <p>15.46 In respect of the documents mentioned in sub-paragraphs <del>(q)</del>, <del>(r)</del> and <del>(s)</del>, <del>(n)</del>, <del>(o)</del> and <del>(p)</del> it is not clear why no outline document is being provided. No explanation is provided in the EM [AS-090] at paragraph 5.3.10 (which concerns requirement 6)".</p> <p>The document references in the suggested amendment have been updated so they are the same as those used in the dDCO <b>[REP1-037]</b>. The point made in paragraph 15.16 of the LIR <b>[REP1-130]</b> querying why no outline</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<p>(g) <del>(h)</del> Landscape and Ecological Management Plan (LEMP) – Kent (which must be substantially in accordance with the Outline LEMP – Kent).</p> <p>(h) <del>(i)</del> Construction Noise and Vibration Management Plan (NVMP) – Suffolk (which must be substantially in accordance with the Outline Construction NVMP - Suffolk).</p> <p>(i) <del>(j)</del> Construction Noise and Vibration Management Plan (NVMP) – Kent (which must be substantially in accordance with the Outline NVMP – Kent).</p> <p>(j) <del>(k)</del> Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk)</p> <p>(k) <del>(l)</del> Public Rights of Way (PRoW) Management Plan – Kent (which must be substantially in accordance with the Outline PRoW - Kent).</p> <p>(l) <del>(m)</del> Soil Management Plan – Suffolk (which must be substantially in</p>	<p>document is being provided for the Material and Waste Management Plan, the Construction Drainage Management Plan; and the Flood Management Plan applies equally to new document (q) the Operational Drainage Management Plan.</p> <p>SCC requests that the applicant justifies its position. The “rationale for the Change” included in the Schedule of Changes <b>[REP1-107]</b> does not assist in this regard.</p>

Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<p>accordance with the Outline Soil Management Plan - Suffolk).</p> <p><u>(m)</u> <del>(n)</del> Soil Management Plan – Kent (which must be substantially in accordance with the Outline Soil Management Plan - Kent).</p> <p><del>(o) Marine Mammal Mitigation Plan (which must be substantially in accordance with the Outline Marine Mammal Mitigation Plan).</del></p> <p><del>(p) Offshore Invasive Non-Native Species Management Plan (which must be substantially in accordance with the Outline Offshore Invasive Non-Native Species Management Plan).</del></p> <p><u>(n)</u> <del>(q)</del> Material and Waste Management Plan.</p> <p><u>(o)</u> <del>(r)</del> Construction Drainage Management Plan.</p> <p><u>(p)</u> <del>(s)</del> Flood Management Plan (FMP); and</p> <p><del>(t) Detailed Marine Biosecurity Plan (which must be substantially in</del></p>	



Ref. No	dDCO Ref	Rationale for Change	Change Made	SCC Comments
			<del>accordance with the Marine Biosecurity Plan).</del> <a href="#">(q) Operational Drainage Management Plan.</a>	
B11.13	Sch.11	These changes reflect amendments made to the land of which only temporary possession may be taken due to the change in approach to the Works Plans.	Various amendments to the column (1) <i>plot number of land shown on Land Plan</i> and column (3) <i>relevant part of the authorised development</i> .	SCC makes no comment on these changes.
B11.14	Sch.16	In its Relevant Representation, the MMO suggested a number of changes to the wording of the draft deemed marine licence at Schedule 16. These submissions have been reflected in the updated drafting where appropriate.	Various amendments throughout the deemed marine licence to reflect ongoing engagement with the MMO.	SCC makes no comment on these changes.