



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council

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1. About this Document

1.1 Purpose of this Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on the Local Impact Report (LIR) submitted by Suffolk County Council in response to the application for development consent for the Sea Link Project.

1.2 Project Overview

- 1.2.1 National Grid Electricity Transmission plc (hereafter referred to as 'the Applicant') has submitted an application for development consent for the Sea Link Project, which proposes to reinforce the electricity transmission network between Suffolk and Kent. The Project comprises the construction and operation of a new high-voltage electricity transmission connection, including underground cables, converter stations, grid supply point substations, and associated infrastructure. It also includes the removal of sections of existing infrastructure and various ancillary works.
- 1.2.2 The application for development consent was accepted for Examination on 23 April 2025.
- 1.2.3 A full description of the Project is provided in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.

1.3 Structure of the Document

- 1.3.1 The **Local Impact Report (LIR) for Suffolk County Council [REP1-130 and REP1-131]** have been structured into 15 chapters. The Applicant has reviewed and provided comments on chapters 1 to 3 and 5 to 15, as presented in Tables 2.1 – 13.1. Comments are provided against the paragraph numbers used in the LIR, with paragraphs grouped where appropriate for clarity and efficiency.

2. Applicant’s Comments on Chapters 1 to 3

2.1 Introduction

2.1.1 This section provides the Applicant’s comments on Chapter 1: Introduction, Chapter 2: Terms of Reference, and Chapter 3: Description of the Area of the Proposed Development

2.2 Comments Table

Table 2.1 Applicant’s Comments on Chapters 1 to 3

Reference	Matter	Point Raised	Applicant’s Comments
Chapter 1 Introduction			
1.5	Shortcomings with proposals	<p>SCC recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed, including:</p> <ul style="list-style-type: none">the proposed use of Benhall Railway Bridge on the B1121 (a County Council asset) for access to the converter station site at Saxmundham, as its structural condition and the complications of constructing an overbridge will create difficulties transporting Abnormal Indivisible Loads (“AILs”) and risks of consequential disruption for the adjacent A12, part of the County’s Major Road Network.the impacts of construction work taking place on Sundays and Bank Holidays, providing the local community with no respite.the significant adverse effects of the proposed River Fromus crossing on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist’s Church, Saxmundham (Grade II* Listed Building); andthe lack of coordination with other projects (most notably National Grid Ventures’ (“NGV’s”) proposed LionLink project	<p>A detailed response to these matters, which were raised by SCC in their Relevant Representations, can be found in Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
1.8	Cabinet resolution	<p>At its Cabinet meeting on the 13 May 2025, SCC resolved to:</p> <p>i. in accordance with the County Council’s Energy and Climate Adaptive Infrastructure Policy, recognise the importance of the Sea Link proposals as part of the required infrastructure to connect low carbon energy generation developments that will reduce carbon emissions and help to meet the need to mitigate a changing climate but; ii. object to the proposals as currently formulated and make this clear in its response to the Planning Inspectorate (“PINS”) as they do not adequately address significant issues. The County Council expects, in the highlighted areas, clearer assessments, outcomes and mitigations to be achieved during the Examination.</p> <p>iii. confirm the significant issues to include:</p>	<p>This is noted by the Applicant.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<ul style="list-style-type: none"> the proposed use of Benhall Railway Bridge on the B1121 for access to the converter station site, due to its structural condition and potential issues with constructing an overbridge; the impacts of the proposed River Fromus crossing, which the County Council deems to be a disproportionate solution to access the converter station site and will cause significant adverse effects on the local landscape character and heritage assets, including the Grade II listed Hurts Hall and Grade II* listed Church of St John the Baptist; the inclusion of 7am-5pm on Sundays and Bank Holidays within the core working hours, providing the local community with no respite from the construction works; and a lack of coordination with other projects (most notably National Grid Ventures' ("NGV's") proposed LionLink project). 	
Chapter 2 Terms of Reference			
2.4	Description of works	This LIR does not describe the Works any further, relying on the Applicant's descriptions as set out in the DCO application documents.	The Applicant notes this comment.
2.7	SoCG	The Council continues to engage with the Applicant through the draft Statement of Common Ground ("SoCG") process, with a view to narrowing the issues in dispute	The Applicant welcomes SCC's position regarding ongoing engagement through the SoCG process.

3. Applicant's Comments on Chapter 5: Landscape and Visual

3.1 Introduction

3.1.1 This section provides the Applicant’s comments on Chapter 5: Landscape and Visual

3.2 Comments Table

Table 3.1 Applicant’s Comments on Chapter 5: Landscape and Visual

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
5.1 – 5.32	Policy Context	The updated policy context is set out which includes relevant parts of National Policy Statements, National Planning Policy Framework, Local Plan Policy and Neighbourhood Plans.	<p>The Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) reviews relevant national and local planning policy to the Suffolk Onshore Scheme and landscape and visual matters which is addressed in full within Tables 1.1, 1.2, 1.3 and 1.4 and supporting text. It should be noted that the Suffolk County Council (SCC) LIR (Application Document 9.35 Local Impact Report (LIR) for Suffolk County Council [REP1-130]) refers to Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects, which notes that projects will need to "<i>mitigate their landscape and visual impacts</i>", and Policy SCLP10.4: Landscape Character, which notes that "<i>development will not be permitted where it will have a significant adverse impact on sensitive landscapes</i>". The documentation does not refer to section 5.10.5 of NPS EN-1 which states that "<i>virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape</i>" and section 5.10.12 which notes that "<i>locally valued landscapes should not be used in themselves to refuse consent as this may unduly restrict acceptable development</i>". Paragraph 4.1.15 NPS EN-1 makes it clear that in the event of a conflict between a development plan and an NPS, "<i>the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure</i>".</p> <p>The Aldringham cum Thorpe Neighbourhood Plan was submitted to East Suffolk Council in March 2025, which is when the application for Sea Link was submitted and has not yet been made. Its examination ended in November 2025 and the neighbourhood plan has not yet been made, so is not yet part of the development plan for the area. The submission version has been included within Application Document 9.35 Local Impact Report (LIR) for Suffolk County Council [REP1-130] at 5.26 and it is noted that a small part of the Proposed Neighbourhood Plan Area lies within the landscape and visual Study Area. The policies around mitigation of impacts of large-scale energy projects and landscape character are acknowledged and the Suffolk Onshore Scheme’s embedded mitigation measures are outlined at Section 1.7 within the Landscape and Visual chapter. As noted above, the NPS prevails where there is conflict with a local policy. Section 2.4.16 of Application Document 7.4.8 Draft Statement of Common</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Ground East Suffolk Council and Suffolk County Council [APP-329] should be referred to with regard to the Applicant's position in relation to compensation for residual landscape and visual effects. The important public views shown on Figures 38 and 39 are not considered to be relevant to the Suffolk Onshore Scheme as they do not lie within Zones of Theoretical Visibility Plans (see Figure 6.4.2.1.8 and 6.4.2.1.9) and those with views orientated towards the temporary aspects of the Suffolk Onshore Scheme (HVDC and landfall) would be screened by intervening vegetation cover and built form.</p> <p>The Saxmundham Neighbourhood Plan was made on 26 July 2023 and has informed both the landscape and visual baseline and the approach to embedded mitigation. The pre-submission draft version of the Saxmundham Modified Neighbourhood Plan (June 2025) was not in the public domain at the time of publishing the Landscape and Visual chapter therefore is not included in the baseline. This modified draft is referred to within Application Document 9.35 Local Impact Report (LIR) for Suffolk County Council [REP1-130] from 5.31 and the policy addressing and mitigating the impacts of large-scale energy projects is noted. However, the Saxmundham Draft Modified Neighbourhood Plan is not currently part of the Local Plan and could be amended prior to being made. Nonetheless, the embedded mitigation measures are outlined at Section 1.7 within the Landscape and Visual chapter. Section 2.4.16 of Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] should be referred to with regard to the Applicant's position in relation to compensation for residual landscape and visual effects.</p>
5.35 – 5.39	Construction Phase Impacts – Negative	<p>The converter station proposals at Saxmundham would result in significant impacts on the existing landscape to the east and south of Saxmundham, including detrimental impacts on the settings of the Grade II listed Wood Farmhouse and Hill Farmhouse at the converter station site, and on the local landscape character and setting of the Grade II listed Hurts Hall and the Grade II* listed Church of St John the Baptist as a result of the proposed access through the Fromus valley, including an access road and a bridge across the River Fromus. Additional impacts are expected at Benhall Railway bridge, which would require some temporary or permanent improvement works, which would be expected to result in vegetation loss, residential amenity and adverse effects on the local landscape character and PRow network.</p> <p>The cable corridor for the interconnector would comprise a swathe of between 63m (HVAC corridor only) up to 78m width (combined HVDC and HVAC corridors), which would be disturbed during the construction of underground cable sections of the route and would require to remain a permanent easement.</p> <p>Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during construction on the following Landscape Character Areas:</p> <ul style="list-style-type: none">i. LCA B4 (Fromus Valley)ii. LCA L1 (Heveningham and Knodishall Estate Claylands)	<p>The Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) summarises the reported effects on landscape and visual receptors including the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (SECHAONB). Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] should be referred to for consideration of the design change associated with the Benhall Railway Bridge, which is not considered to give rise to significant adverse landscape and visual effects. The Benhall Bridge options being considered have evolved in response to feedback and progression of the planning application for residential development adjacent to the Bridge. The semi-permanent bridge solution is no longer being considered. This would remove the need for the minor vegetation loss associated with creation of an access to the field to the east of Benhall Bridge.</p> <p>Further information on the effects on the SECHAONB should be referred to within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. The highly limited indirect effects of the Suffolk Onshore Scheme arising from the Saxmundham Converter Station and Friston Substation (Friston Scenario 2) are further explained within Application Document 9.11.1 Additional visualisation request from the AONB [AS-103]. It should also be noted that at 6.3.1.2 of Application Document 9.35 Local Impact Report for East Suffolk Council [REP1-128] it is stated that "<i>the proposed converter station site lies to the east of the town and is detached from the setting of the National Landscape</i>".</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>It is difficult to follow that the adverse effects on the SECHNL are judged as minor on all accounts, despite the very high value, susceptibility and hence sensitivity, and despite the long list of intrusive works that are listed.</p> <p>Harm to any parts of the AONB needs to be considered harm to the AONB as a whole and to its statutory purpose. SCC considers further that the adverse effects on landscape quality, scenic quality, relative wildness and tranquillity, are significant beyond the DCO limits and are likely to affect a considerable part of the AONB.</p>	<p>The Applicant notes the comments raised regarding impacts to the setting of a number of designated assets.</p> <p>The Application has been informed by Historic England and East Suffolk Council that the listed status of Wood Farm was removed after the DCO was submitted Application Document Written representations (WR) and Summaries for Historic England [REP1-199]. As such, impacts are no longer predicted on Wood Farm.</p> <p>A detailed response to other built heritage matters can be found in Application Document 9.34.1 Applicant's Comments on Relevant Representations [REP1A-043].</p>
5.40 – 5.41	Construction Phase Impacts – Negative: Cable Corridor	<p>The cable corridor, with a standard working width of 63m (HVAC corridor only) or 78m (combined HVDC and HVAC corridors) [AS-093] is expected to result in considerable vegetation loss where vegetation would be lost, both between the converter station at Saxmundham and the substation Friston, and between Saxmundham and the landfall site at the coast, north of Aldeburgh. Although, it is welcome that no ancient and veteran trees require full removal.</p> <p>SCC considers that trees that are removed, but cannot be replaced within the cable corridor, need to be replaced elsewhere (as close as possible to location where the tree loss occurred).</p>	<p>The Landscape and Visual ES Chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) considers any tree loss within the assessment on landscape and visual receptors. Landscape planting proposals are set out within the outline Landscape and Ecological Management Plan (oLEMP) (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]). The oLEMP commits to reinstatement of vegetation removal. Whilst this means that trees that have been removed above the cable alignment cannot be replaced in situ, during the detailed design process tree planting nearby where the Order Limits allow would be reviewed.</p>
5.42 - 5.45	Construction Phase Impacts – Negative: Landfall Site	<p>The proposed landfall site is located between Aldeburgh and Thorpeness, within the highly constrained Suffolk and Essex Coast & Heaths National Landscape ("SECHNL") (formally known as "Suffolk Coast & Heaths Area of Outstanding Natural Beauty") and the Suffolk Heritage Coast.</p> <p>It is close to the Sandlings Special Protection Area and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI). The site also has high archaeological potential. In terms of tourism, the site is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.</p> <p>SCC disagrees with the Applicant that the adverse effects on landscape character will not be significant during construction. While the vegetated shingle may remain unaffected, the construction activities are expected to be highly detracting within the open coastal landscape.</p>	<p>The limited effects associated with the landfall site on landscape and visual receptors are detailed within the appendices for landscape character assessment (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]) and visual amenity assessment (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). This includes that the open coastal landscape and vegetated shingle between Aldeburgh and Thorpeness would be unaffected by the construction of the landfall as a trenchless crossing technique would be used beneath the coastal landscape. Effects are therefore limited to those associated with the construction activity in the near shore water with the presence of a cable laying barge which would not be dissimilar to the presence of marine vessels which can be typically seen out at sea and construction around the landfall transition joint pit. This would be set against a backcloth of woodland and not the focus of views from recreational receptors walking between Aldeburgh and Thorpeness. Further details on this should be referred to within Table 2.3 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP-1A-043].</p>
5.46 – 5.58	Construction Phase Impacts – Negative: Effects on designated and defined landscapes	<p>SCC (landscape) considers that Table 2.1 of Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] does not provide a sufficient or adequate assessment for the SECHNL.</p> <p>The Work Plans – Suffolk [APP-021] show a temporary construction compound will be placed where the cables make landfall within the SECHNL. Temporary</p>	<p>The assessment of the SECHAONB within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] is considered to be adequate and proportionate. The assessment takes into account the various location-specific elements of the individual Natural Beauty Indicators (set out within Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]). The location-specific elements of the individual Natural Beauty Indicators are derived from the</p>

Reference	Matter	Point Raised	Applicant’s Comments
		<p>work compounds are listed as Work No. 4 in the draft DCO [AS-087] which allows the promoter to carry out the following works:</p> <ul style="list-style-type: none"> a) site clearance, preparation, and establishment. b) earthworks, soil stripping and storage, ground improvement. c) car parking, hard standing, roadways and access roads (including construction site services and temporary bridges and/or culverts). d) drainage works e) office and staff welfare facilities f) utility service connections for electricity, communications and potable water and/or connection of power supply made from temporary generators. g) utility service connection or on-site storage for later disposal of grey water and sanitation. h) emergency electrical generator. i) materials, tools and fuel storage and laydown areas. j) assembly areas. k) plant and equipment storage areas. l) wheel cleaning facilities. m) security cabin and fencing and gates. n) construction and security lighting; and o) construction waste management facilities. <p>Given the fact that the DCO gives the Applicant the powers to carry out all of these works in relation to the landfall construction compound, each work should be reflected in the assessment on the SECHNL’s natural beauty with the exception of any works prohibited by a control document for this compound. SCC does not consider that the extent of the works associated with the landfall construction compound is reflected in the Applicant’s assessment of the project’s effects on the SECHNL’s natural beauty.</p> <p>SCC questions the findings that the impacts on landscape quality of the affected parts of the SECHNL are small. The Applicant assesses the impacts on this natural beauty indicator in terms of displacement of ‘acid grassland within the SECHNL, including at the landfall construction compound’ ([APP-097], table 2.1). The presence of the landfall construction compound itself, not just its effect on acid grassland, should be considered within the assessment. The compound is likely to have substantial impacts on the landscape quality of the surrounding area within the SECHNL. For instance, it will increase the influence of human-caused incongruous elements, which is listed as an indicator of Landscape Quality in Appendix 12, through visual intrusion and increased human activity.</p> <p>The compound is also likely to affect other factors of natural beauty such as Scenic Quality in terms of distinctive sense of place, visual interest in patterns of land cover and appeal to the senses. Relative Tranquillity and Relative Wildness are also likely to be affected by the works relating to the landfall construction compound.</p>	<p>sub-factors of the Natural Beauty Indicators. This approach was also taken for other local projects (such as Sizewell C within the SECHAONB) and enables the reader to understand the most important changes to each of the Natural Beauty Indicators. As noted in the Landscape Institute’s Technical Guidance Note 2024-01 (Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)) (published August 2024), Landscape and Visual Impact Assessment (LVIA) should communicate where the most important effects will arise and why and to what degree that matters, which this approach conveys.</p> <p>The assessment, summarised within the Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]), is based on the detailed information provided in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]. Consequently, the plant and activity associated with the landfall construction compound has been fully considered and reflected in the assessment on the SECHAONB including the relevant Natural Beauty Indicators. This has included the temporary displacement of acid grassland and construction plant and machinery affecting scenic quality. It would be inappropriate and disproportionate to list each works item (a – o) and assess them separately on the Natural Beauty Indicators as collectively they contribute to the construction plant and activity associated with the compound. Where appropriate, specific aspects have been identified such as construction lighting.</p> <p>The 'small' relates to the proportion of acid grassland when considering the proportion of acid grassland cover of the SECHAONB as a whole. Whilst 7.61 hectares (ha) of acid grassland would be affected, only 0.3 ha is priority habitat acid grassland.</p> <p>Regarding the remaining assessment on landscape quality, the Suffolk Coast and Heaths Indicators relating to 'the influence of incongruous features or elements (whether man-made or natural) on the perceived natural beauty of the area' relates predominantly to operational built form rather than temporary construction compounds. The construction works are not considered to be incongruous due to the siting amongst a backcloth of woodland and a location close to the B1122.</p> <p>The comments disputing the similarity between agricultural machinery operating on arable land and the seasonal disturbance of soils compared with the construction activity along the HVDC cable corridor are not valid. Both activities involve temporary interventions that disturb the soil profile and require the presence of plant and machinery within an agricultural landscape.</p> <p>For further details of quantities of habitats affected within the SECHAONB and timings of effects within the construction and operational stages of the Suffolk Onshore Scheme, refer to Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. It should be noted that the exact quantities of habitats affected cannot be fully established at this stage of the Proposed Project as the Limits of Deviation allow for flexibility in the exact location of the works in order for micro-siting to minimise effects.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>There are other aspects of the works forming part of the project which could affect the SECHNL's natural beauty but are not mentioned in relation to every relevant natural beauty factor. These include storage bunds for soils, security boundary along the corridor and bellmouths at access points. Moreover, SCC considers that these works, in addition to noise levels from HDD, soil displacement caused by the open cut trench and other works listed in Work No. 4, are likely to be far more striking and noticeable in terms of signalling human industrial activity in comparison to agricultural activity. Therefore, SCC does not consider it accurate for the Applicant to claim that the construction activities within the SECHNL are similar in effect to those undertaken on agricultural land. These considerations should be reflected in the Applicant's assessment.</p> <p>Whilst the works within the SECHNL are temporary, elements will remain adversely affecting the SECHNL's natural beauty for several months or years during the construction phase and into the operational phase.</p> <p>SCC (Landscape) considers that the impacts are not sufficiently quantified to allow a realistic understanding of the effects (very small loss of trees, removal of small sections of boundary features, displacement of small sections of acid grass land, remaining short sections of monitoring access routes and occasional vehicle movements).</p> <p>Trees within the cable corridor will be irreversibly lost, as they cannot be replaced across the cables. Access roads remain in place during the operation and maintenance phases and are likely to include engineered bellmouths and require maintained visibility splays, thus permanently altering the local landscape character.</p> <p>The Applicant further fails to acknowledge that the character of the SECHNL and its special qualities and natural beauty indicators are affected in an area that is particularly representative and highly frequented by various receptor groups, thereby affecting the understanding, interaction with and enjoyment of the statutory purposes of the SECHNL.</p> <p>The assessment on the Natural Beauty of the SECHNL [APP-097] indicates that there are effects which go beyond Landscape and Visual. The assessment refers to the effects of construction traffic, drilling for the trenchless cable installation at landfall and an increase in human activity and machinery. This suggests that there will also be Noise and Vibration effects on the SECHNL. The Applicant's noise assessment figures ([AS-125]) appear to identify several residential receptors within the SECHNL assessed to experience substantial impacts during construction, with some receptors experiencing significant effects. SCC considers that the SECHNL should be assessed as a receptor for noise and vibration effects. Regarding the intra-project cumulative effects assessment [APP-059], SCC considers there to be potential for noise impacts on the SECHNL to combine with adverse Landscape and Visual effects already identified by the Applicant to potentially rise to the level of significance. This would particularly apply to Natural Beauty features such as Relative Tranquillity.</p>	<p>The assessment on the SECHAONB assumes a worst-case assessment that the part of the SECHAONB affected is representative and highly frequented and this is reflected in the 'very high' landscape sensitivity rating attributed.</p> <p>The assessment on the SECHAONB adequately considers noise in relation to effects on landscape character, such as on relative wildness and tranquillity. With regards to residential receptors within the SECHAONB, the assessment has identified a number of properties where there are potential significant adverse effects from noise, without mitigation. The assessment has been undertaken in this way to identify potential noise 'hot-spots' where mitigation is required to avoid significant adverse effects. However, with mitigation in the form of best practicable means, these significant adverse effects will be avoided. Further detailed construction noise and vibration assessments will be undertaken by the contractor, during which specific noise mitigation measures will be identified. This is secured through commitments NV01 and NV03 of Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]. It should be noted that a dwellings sensitivity to noise is not affected by being within the SECHAONB (i.e. their sensitivity is the same as all other dwellings). However, it is agreed that the SECHAONB is more sensitive generally to noise than areas outside of such an area. The contractor is committed to the use of best practicable means to reduce the effects of noise and vibration and such a commitment would extend to reducing potential effects within the SECHAONB.</p> <p>Regarding the intra-project cumulative assessment (Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]), the Applicant has agreed to provide further consideration to reporting of the intra-project cumulative effects which will be provided at a future examination deadline (Application Document 9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]).</p> <p>Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] provides a single source of reference for material which demonstrate the Applicant's compliance with the section 85 (s85) duty within the DCO application documentation.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Given the elevated status of protection granted to designated landscapes by EN-1, SCC consider it necessary for the full extent of impacts on the SECHNL to be assessed to ensure appropriate measures of avoidance and mitigation are secured within the application. This point is also relevant to the statutory duty found in section 85 A1 of the Countryside and Rights of Way Act 2000 as the question of whether the Applicant has sought to further the purpose of conserving the natural beauty of the SECHNL must be informed by the impact the proposed development will have on the natural beauty of the SECHNL.</p> <p>EN-1 requires appropriate, proportionate, and sufficient measures which seek to further the purposes of the designation of an affected protected landscape. The question of what is appropriate and proportionate is inherently linked to the extent of the effects on the designated landscape, meaning there is greater difficulty demonstrating compliance with the policy if the assessment is incomplete. As stated in the Planning Statement [AS-057], there is an area included in the Order Limits within the SECHNL in which the Applicant will provide 6 hectares of acid grassland enhancement to allow the section 85 duty to be discharged. This would likely satisfy the EN-1 requirements were the project's effects limited to the displacement of acid grassland. However, the project's effects also include those arising from various construction activities associated with HDD, HVDC cable laying, vegetation removal, and the landfall construction compound amongst others. In this section, SCC has suggested how these activities could adversely affect the natural beauty of the SECHNL in ways not considered in the Applicant's assessment [APP-097]. If adverse effects are found to go beyond the levels as currently assessed, SCC would encourage the ExA to consider whether further measures which seek to enhance the statutory purposes of the SECHNL are necessary to allow the duty to be discharged and to satisfy EN-1.</p>	
5.59 – 5.61	Construction Phase Impacts – Negative: Potential adverse effects on landscape and visual mitigation measures of other projects	<p>SCC considers that the significant loss in trees and hedgerows within the cable routes coincides or occurs in close succession to significant vegetation loss to other projects within the SECHNL and wider East Suffolk, such as for Sizewell C, resulting in significant inter-cumulative effects.</p> <p>SCC considers that the significant loss in trees and hedgerows within the cable routes coincides or occurs in close succession to significant vegetation loss to other projects within the SECHNL and wider East Suffolk, such as for Sizewell C, resulting in significant inter-cumulative effects.</p> <p>It is further important to note that the AC cable corridor route risks undermining the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N and EA2, specifically around Friston substation (Scenario 1).</p> <p>While SCC accepts that in some cases mitigation of residual inter-cumulative effects may not be achievable, it considers that options should be fully explored. Where mitigation of significant cumulative effects is not available, as stated for cumulative effects with East Anglia ONE & TWO Offshore Windfarms (ID 5 and</p>	<p>The tree and hedgerow loss associated with the HVDC and HVAC cable corridors in isolation is not considered to be significant, and it should be noted that the hedgerow loss is temporary only. Tree loss has been minimised where possible and is currently reported as a reasonable worst case to allow flexibility in the final alignment of the Proposed Project as noted in the Arboricultural Impact Assessment (AIA) (Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]). Where practicable the detailed design will be further developed to avoid or minimise impacts to trees.</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-060] reports that potentially significant total cumulative effects during construction would result to the SECHAONB and LCA K3 Aldringham and Friston Sandlands primarily as a result of the construction of the cable corridors associated with EA1N, EA2, LionLink and Sea Link. These total cumulative effects are considered to be short term and temporary until the cable corridors are reinstated.</p> <p>The vegetation loss for the Proposed Project, which is predominantly an underground and undersea cable, is not comparable with the vegetation loss required for the Sizewell C project. Particularly as the Saxmundham Converter Station would not involve the removal of vegetation or trees to facilitate the construction of the platform.</p>

Reference	Matter	Point Raised	Applicant's Comments
		ID 6) and South Saxmundham Neighbourhood (ID 291), compensation must be considered as the final element of the mitigation hierarchy.	<p>The total area of canopy cover recorded by the tree survey is 709,821 m² and the extent of canopy loss due to tree removal equates to approximately 47,903 m². Therefore, the final extent of tree loss equates to approximately 6.74% of the surveyed canopy cover area (m²). However, as identified in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348 superseded by AS-059], there would be a long-term net increase in woodland habitat due to the Suffolk Onshore Scheme with a total area of 214,931 m².</p> <p>The Proposed Project will not undermine the effectiveness of the landscape mitigation set out for the consented EA1N and EA2 DCOs. The approved outline landscaping for the EA1N and EA2 projects is set out in the Outline Landscape and Ecological Management Strategy (Version 08), 31 January 2022 (OLEMS). This outline strategy, which is reflective and proportionate to the findings of the EIA presented in the EA1N and EA2 project ESs, comprises reinforcement of historic hedgerows and small woodland block planting to provide screening from isolated properties and from users of the PRoW network, while providing a layered screening approach. It does not sterilise land for potential future development associated with the National Grid substation.</p> <p>The Applicant, in collaboration with Scottish Power Renewables (SPR), is confident that detailed landscaping designs that accord with this outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables. The Order Limits and Limits of Deviation for the HVAC cables for Sea Link have deliberately been widened to provide significant flexibility to minimise any impacts on future planting. National Grid is working closely with SPR to understand the interactions with emerging detailed designs and minimise these where possible.</p> <p>When SPR has submitted its detailed landscape masterplan, the Applicant will submit a plan demonstrating how the function of the landscaping can be retained with the cables in situ, including both the HVAC and HVDC cables. This has not been possible to date given that the landscaping plan for EA2 has not been finalised or released into the public domain. However, the Applicant is confident that interactions with areas of the EA1N and EA2 planting will not undermine the effectiveness of the landscape mitigation, and that where necessary minor revisions to the mitigation plan can be agreed.</p> <p>Section 2.4.16 of Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] provides the Applicant's position in relation to compensation for residual landscape and visual effects.</p>
5.63 – 5.66	Operational Phase Impacts – Neutral	<p>Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] predicts no effects during operation on the following Landscape Character Area and Seascape Character Type:</p> <ul style="list-style-type: none">• LCA D4 (Thorpeness to Aldeburgh) – negligible adverse (non-significant) effects at Year 1, but no change at Year 15• SCT 03 (Nearshore Waters) – no change at Year 1 or Year 15• SCC (Landscape) does not agree with this (please see comments below, under negative.)	<p>Tree loss has been minimised where possible and is currently reported as a reasonable worst case to allow flexibility in the final alignment of the Proposed Project as noted in the Arboricultural Impact Assessment (AIA) (Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]). Where practicable the detailed design will be further developed to avoid or minimise impacts to trees. Permanent tree loss would be spread across the Suffolk Onshore Scheme. Therefore, due to the layered vegetation pattern within the local landscape, this would not be read as a treeless corridor from those experiencing the landscape at a similar landform level.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Surface infrastructure would remain highly visible within the landscape. This includes the converter station itself, but also the access road and the bridge across the River Fromus, and potentially the substation in Friston, if Scenario 2 applies.</p> <p>Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during operation on the following Landscape Character Areas:</p> <ul style="list-style-type: none">• LCA B4 (Fromus Valley) – assessed to be significant at Year 1 winter, but non-significant at Year 15 summer• LCA L1 (Heveningham and Knodishall Estate Claylands) <p>SCC disagrees with the Applicant's judgement that at year 1 of Operation the majority of the HVDC corridor would be restored to former land use. While hedges are quicker and easier to reinstate than trees, they will visually be dominated by growing tubes and stakes. The loss, and permanent loss of tree within the cable corridor should not be glossed over. It stands to hope that by year 15 the hedges and most other habitat types will be reinstated, and adverse effects would become less pronounced. There is, however, concern that the treeless cable corridor remains legible in the landscape beyond year 15. The residual effects at the landfall site and at joint bays would be expected to be minor, but still evident.</p>	<p>The presence of growing tubes and stakes whilst locally visible along reinstated field boundaries would not dominate the landscape or views and are common features associated with any new planting in the East Suffolk landscape.</p>
5.67 – 5.71	Operational Phase Impacts – Negative: Converter Station Site	<p>The land to the north and east of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood²², as well as ponds and a small plantation typical of the Ancient Estate Claylands²³ landscape type, of which this area is part. The current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119.</p> <p>There are several listed buildings within the vicinity of the converter station site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting.</p> <p>Saxmundham Footpaths 5 and 6 cross the site and require diversion.</p> <p>SCC (Landscape) considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.</p> <p>The strip of land along of the B1119 currently included in the proposed DCO limits, does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, which also connect to other PRoW in the area.</p>	<p>The comments about the proposed Saxmundham Converter Station Site are noted with respect to the absence of historic landscape features and open arable land. However, whilst the converter station would be clearly visible from the B1119 and there are wide-reaching views from the B1119 as far as Sizewell on the skyline, the local landscape contains a layered vegetation network which creates filtered views.</p> <p>Wood Farmhouse has been delisted and demolished and a Supplementary Environmental Assessment (to be submitted before the end of examination) will be provided to revise the Cultural Heritage impact assessment of Wood Farmhouse accordingly. Hill Farmhouse is assessed in Paragraph 3.9.117 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]. This concludes that there would be no impact upon Hill Farmhouse.</p> <p>Additional opportunities for recreation and community benefits are not identified as essential mitigation in the Environmental Statement. Whilst the Applicant seeks to deliver enhancements and additional benefits where possible, this cannot be delivered on land to be compulsorily acquired as it would not meet the tests for compulsory acquisition if the land is not 'necessary' to develop a PRoW in this location in the long term. Therefore, whilst the Applicant would support a PRoW to the south of the B1119, it has not been considered possible to incorporate this into the DCO as it would require greater rights than are being sought at present over this land. Information on this has also been provided within Table 2.2 and Table 22.2.5 of Document 9.34.1 Applicant's Detailed</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>The planting proposals along the B1119 provide space for a hedgerow and hedgerow tree planting which is part of the wider essential landscape mitigation measures provided to reduce effects on landscape character and visual amenity. The hedgerow and tree planting proposed would provide a further layer of vegetation within the landscape reflective of the historic pattern of vegetated field boundaries. Along with the advanced planting of this area to provide early establishment, it would assist in partially screening views from road users particularly in views approaching Saxmundham. It would also provide ecological connectivity by linking areas of existing woodland and hedgerows. The approach adopted is considered by the Applicant to be proportionate and reflects the need to provide sufficient space for co-location of other projects. Further detail on the planting proposals and request for an additional Public Right of Way along the B1119 should be referred to at 3.18.2 within 9.34.2 Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112].</p>
5.72 – 5.77	Operational Phase Impacts – Negative: River Fromus Crossing	<p>Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts and effects on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment.</p> <p>It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'</p> <p>SCC (Landscape) also considers that the proposals will have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).</p> <p>SCC (Landscape) welcomes the change in layout of the Fromus crossing to avoid irreplaceable veteran/ancient trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, from and of</p>	<p>The effects of the proposed River Fromus bridge crossing on landscape and visual receptors are summarised within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. This includes consideration of the Suffolk Coastal Sensitivity Assessment (2018) and Saxmundham Neighbourhood Plan (2023) 'Important Views'. Further information on 'The Layers' should be referred to Table 2.3 at Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP-1A-043].</p> <p>Regarding the comment around views being opened up, Table 2.23 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] should be referred to. As noted above, there are ongoing conversations with SCC landscape and heritage officers and East Suffolk Council regarding the design of the River Fromus bridge and updates have been made to the Design Approach Document to reflect such conversations (Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]). In addition,so have illustrative visualisations of the River Fromus bridge (Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]).</p> <p>The potential for the bridge over the River Fromus to be temporary has been considered by the Applicant, but rejected as a proposed solution as it is part of the main access to the converter station. This has been discussed with SCC in meetings following submission of the application, including an explanation provided in the meeting minutes that were issued to SCC landscape team on 6 November 2025. A permanent bridge over the Fromus will enable all operational, maintenance and eventually decommissioning traffic associated with the converter station to avoid Saxmundham and Leiston. It is therefore required permanently. Should a temporary bridge be used for construction only, then operational and the majority of maintenance traffic would have to be routed through Leiston or Saxmundham which is undesirable due to existing congestion and the constrained geometry of the roads. In addition, Abnormal Indivisible Loads required for some maintenance works or the replacement of a transformer would require the reintroduction of the temporary bridge, requiring significant</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Hurts Hall, and of the Church of St John the Baptist. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. SCC (Landscape) is not at present persuaded, from the limited information so far provided on the design and appearance of the bridge, that such an outcome can be assured.</p> <p>Table 3.1 of Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during construction, operation and maintenance, and decommissioning on SCLCA LCA B4 Fromus Valley.</p> <p>Given that the proposed bridge and access route has been assessed to have long-term significant adverse effects if it was to be made permanent, SCC considers that this access route should be temporary only.</p>	<p>additional cost and impact. This would be particularly problematic if Abnormal Indivisible Load access is required urgently. The introduction of a permanent bridge also provides opportunities to achieve high quality design in a way that would not be possible for a temporary bridge.</p>
5.80 – 5.81	Decommissioning Phase Impacts – Negative	<p>Document 6.3.2.1C ES Appendix 2.1C Landscape Designation and Landscape Character Assessment [APP-097] acknowledges significant adverse effects during decommissioning on the following Landscape Character Areas:</p> <ul style="list-style-type: none">• LCA B4 (Fromus Valley)• LCA L1 (Heveningham and Knodishall Estate Claylands) <p>SCC considers that there would be potentially significant impacts upon the SECHNL and the Suffolk Heritage Coast, if the infrastructure is removed at decommissioning. The impacts and effects would be comparable with those during construction. The infrastructure demolition would represent an intrusive feature in the landscape during decommissioning.</p>	<p>The effects of decommissioning on landscape and visual receptors are summarised within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. This notes that it is considered that the effects at decommissioning would be no greater than the effects identified at construction. Therefore, the outcomes of this project stage are considered to be no different to the findings of the construction stage assessment and is consequently not considered separately. The assessment of the SECHAONB within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] does not report significant adverse effects at construction therefore it is not considered that there would be significant adverse effects at decommissioning.</p>
Required Mitigation			
5.82 – 5.85	Landscape and visual mitigation and compensation	<p>The proposals are located in highly constrained landscapes and the application of Good Design principles as well as application of the full Mitigation Hierarchy (including compensation for adverse effects that cannot be mitigated) will be essential.</p> <p>While the embedded mitigation is fundamental to make the proposed scheme acceptable in landscape terms, SCC (Landscape) considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate and, if necessary, compensate, landscape and visual impacts and effects.</p> <p>The Council is disappointed that a considerable amount of land has been removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.</p>	<p>Section 2.4.16 of Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] sets out the Applicant's position in relation to compensation for residual landscape and visual effects.</p> <p>Regarding the removal of land within the draft Order Limits, Table 2.2 and 2.10 should be referred to within Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Suffolk County Council is concerned that, through minimising areas that are to be included within the DCO (removing most of the field south of the B1119), comprehensive landscape and visual mitigation, commensurate with the proposals, is being made more difficult, if not impossible, to deliver. Landscape enhancements in this location would not be remote from the site, and therefore SCC considers that compensation, at least to some degree, is possible and is worthwhile pursuing.</p>	
5.86 – 5.88	Good Design	<p>SCC considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be further developed. Although it is anticipated that work on the design of the converter station would continue post-decision, if the Secretary of State granted development Consent, SCC (Landscape) is concerned about how little detail has been provided.</p> <p>SCC welcomes Document 7.12.1 Design Principles – Suffolk [APP-366] and that a design champion has been assigned to the project. SCC welcomes that the Applicant considers the Suffolk Coast & Heaths Area of Outstanding Natural Beauty - Guidance on the selection and use of colour in development and the Lighting Design Guide - Dedham Vale National Landscape and Coast and Heaths National Landscape useful.</p>	<p>Requirement 6 of Schedule 3 of Application Document 3.1(E) draft Development Consent Order [AS-012], will necessitate the submission and approval of a LEMP (incorporating the detailed landscape design) which must be in substantial accordance with the provisions set out in the oLEMP, including the outline landscape mitigation plans.</p>
5.89 – 5.90	Overarching Principles	<p>Whilst SCC welcomes the production of Overarching Principles and the Project Level Design Principles, SCC notes that only the Key Design Principles from this document are secured in the draft DCO [AS-087] as part of Requirement 3. SCC questions by what mechanism the proposed development will be carried out in accordance with these principles whether as written or approved with limited variation post-consent. Therefore, it is not clear to SCC what the purpose of the production of these principles is if there is no requirement for the development to follow some form of them. SCC (Landscape) welcomes the Overarching Design Principles, in particular OA.4, which indicates that the Mitigation Hierarchy is to be applied in full, including offsetting.</p>	<p>Requirement 3 states that <i>“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 as presented in Document 7.12.1 Design Principles – Suffolk and Document 7.12.2 Design Principles – Kent”</i></p> <p>The Key Design Principles are secured and would be discharged as set out in Requirement 3.</p> <p>The Outline Design Principles and Project Level Design Principles are not secured and are not written to be so.</p> <p>There is a difference between those principles that must be secured to provide confidence that the design will progress in line with national policy and provide essential mitigation (Key Design Principles); and those that are guidelines to be followed in the detailed design of a major infrastructure project insofar as is appropriate, where flexibility is required for delivery. The first set of principles can be secured and approved by the local planning authority, and must meet the tests applied to requirements. These are secured under Requirement 3.</p> <p>In contrast, the Overarching Design Principles and Project Design Principles are not necessary for policy compliance and are higher level guidelines rather than specific measures. These principles are not suitable to be secured in requirements because they are not considered to be necessary, precise or enforceable. For example, the first Overarching Principle states that <i>“Design throughout the life of the Proposed Project will be guided by the Design Vision to ensure a cohesive and optimal outcome that meets the ambitions set out at the early stages.”</i> Whilst this is absolutely a sensible principle, demonstrating compliance with this principle could be challenging and there is scope for misunderstanding over what ‘guided by the Design Vision’, ‘a cohesive and</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>optimal outcome' and 'ambitions set out at the early stages' means. Ambiguity can lead to significant challenges and delays in the discharge of requirements; resulting in significant and unnecessary delays to major infrastructure projects, as well as administration for all parties; therefore broad commitments like this are not best practice when writing design principles and these commitments are not considered suitable for being secured as a result.</p> <p>The mitigation hierarchy has been applied throughout the iterative Environmental Impact Assessment process and its application is reported in the Environmental Statement. Measures to address the mitigation hierarchy have already been incorporated into the project and are secured in management plans, such as the Outline Construction Environmental Management Plan. It will be for the Secretary of State, guided by the Examining Authority, to determine whether these measures are sufficient for the project to be consented.</p> <p>It is the Applicant's intention that the mitigation hierarchy would continue to be applied to detailed design; however, it is not considered necessary or appropriate for this process to be overseen or approved by the local planning authority, as all necessary works will have been incorporated into the project and in the event that the DCO has already been consented by the Secretary of State. The broad nature of this principle (OA.4 in Table 2.1 of Application Document 7.12.1 Design Principles - Suffolk [APP-366]) also introduces potential for disagreement on how to assess compliance with the principle in the context of a consented project. For example, if the local planning authority requested additional 'offsetting' through payments or off site delivery that has not been established as required in the application; the applicant could be in a position where a major infrastructure project is awaiting discharge of a requirement whilst a debate is had over whether the hierarchy has been applied if a particular offsetting measure has not been incorporated.</p> <p>It is nevertheless considered beneficial for the measures in the Overarching Design Principles and Project Level Design Principles to be included as guidance for the team throughout detailed design so it is not considered necessary for these principles to be deleted.</p> <p>Section 2.4.16 of Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] should be referred to with regard to the Applicant's position in relation to compensation for residual landscape and visual effects.</p>
5.91 – 5.96	Project Level Design Principles	<p>Of the Project Level Design Principles SCC (Landscape) particularly welcomes PE.3 anchoring the aim to increase green infrastructure opportunities and thereby to improve recreational links.</p> <p>What appears to be missing among the project level design principles relating to people is a clear concept of Community engagement (this would need to be independent and go beyond PE.1.</p> <p>SCC (Landscape) considers principle PL.1 (Minimising and rationalising land take) problematic as this compromises the delivery of recreational community benefits north of the proposed converter station.</p>	<p>The support for Project Level Design Principles is welcomed.</p> <p>The Development Consent Order process is designed to present a one stop shop, front loaded approach with significant community consultation prior to consent. The Applicant will continue to engage in the ways set out in the Design Principles document and elsewhere, for example to provide prior notice of construction or highway works. However, given the nature of the project, the urgency of the programme and the extensive commitments made in management plans and associated documents, it is not considered that an additional Project Level Design Principle is required on consultation.</p> <p>In terms of principle PL.1, this principle reflects requirements to support a case for compulsory acquisition. Section 122 of the Planning Act provides that a development consent order may only authorise compulsory acquisition if the Secretary of State is satisfied that:</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>SCC (Landscape) considers that it is essential to restore individual trees that are lost to the scheme within the related landscape and that this should be anchored into PL.2.</p> <p>PL.6 should include that these infrastructure elements will be appropriately mitigated in landscape and visual term, through appropriate mitigative planting.</p> <p>SCC (Landscape) welcomes V.4 which includes advance planting, where possible.</p>	<ul style="list-style-type: none"> the land is required for the development to which the consent relates, or is required to facilitate, or is incidental to, the development, or is replacement land given in exchange under section 131 or 132, and there is a compelling case in the public interest for the compulsory acquisition. <p>Therefore, where land is to be acquired compulsorily it is necessary for land take to be minimised and rationalised; land cannot be acquired solely to secure community benefits. Whilst the Applicant has been working to explore alternatives to compulsory acquisition and in some cases progress is being made to obtain land by negotiation; in many areas of the project the Applicant is seeking compulsory acquisition powers and in this context removal of this principle is not considered appropriate.</p> <p>The Applicant agrees with the requirement to reinstate planting and the mitigation of landscape and visual effects (comments on PL.2 and PL.6) but given that the Project Level Design Principles are not secured, this is not the place to secure this measure. Instead these requirements are secured within the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]).</p> <p>The indicative converter station layouts in Application Document 2.13 Design and Layout Plans [APP-037] have been produced in accordance with Project Level Design Principle PL.6 with all of the listed infrastructure elements being within the converter station compound. Therefore they have been included in the assessment and any mitigation measures are embedded in the design of the Proposed Project.</p>
5.97 – 5.102	Converter Station Design Principles – Suffolk	<p>SCC would welcome greater commitment by the Applicant in the ‘Potential Associated Activities’ column. Are these not activities that should happen?</p> <p>SCC considers that the principles regarding the Public Space lack detail and commitment. In is noted that references to improving the PRow network have not been included. There is no clear intention nor commitment to provide additional permissive access, but rather a management of expectations (permissive access ‘may well not be possible for operational reasons,’ paragraph 3.2.16). Enhancements within the public realm are not included.</p> <p>Principle CO.4 should probably include VP20, VP19 and VP5 as additional key views.</p> <p>SCC is concerned that the principles regarding Public Space have the potential to curtail public amenity and mitigative planting. Principle PS.1 does not provide reassurance that the visual amenity of the local PRow will be safeguarded, and the mitigative planting is subject to security measures, which may limit its ability to fulfil its screening function. SCC supports security measures but considers that these need to be integrated well withing the overall landscape design and as discreet as possible.</p> <p>SCC considers that principle R.2 and shaping the landform around the converter station in a credible way will be essential to integrate the converter station into</p>	<p>‘Potential Associated Activities’ are considered to be correctly categorised. The suggestions are not considered necessary to discharge Requirement 3 and present, at best, one way in which information could be presented rather than necessary commitments. It may be that in detailed design there are more effective or efficient modes of communication so it is not considered in any parties interests to be prescriptive by stating that this information ‘should’ be provided in the way presented.</p> <p>Some activities would only be possible with the cooperation of third parties, such as other developers, over which the Applicant does not ultimately have control, so ‘should’ would also not be reasonable for these activities.</p> <p>Finally, ‘Potential Associated Activities’ taken individually and together go beyond what is necessary to demonstrate compliance with the Key Design Principles. Therefore, whilst the Applicant agreed to secure the Design Principles, it is not considered necessary to secure the ‘Potential Associated Activities’.</p> <p>However, it is recognised that some of these activities could aid in understanding and buy in of proposals, so this column is intended to present ideas to be considered in detailed design, not commitments. It is also recognised that providing ideas of how information could be presented could be helpful to parties constructing the project who may not be clear on how principles.</p> <p>Table 3.1 of Converter Station Design Principles only covers the Suffolk converter station (Work No. 3B), and its relationship to the access road, river crossing, and associated landscape mitigation proposals around it. Commitments for the landscape proposals are included in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] and secured via</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>its surroundings. SCC welcomes the ambition to share cut and fill across a combined masterplan with other projects.</p> <p>SCC welcomes principle R.3.</p>	<p>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102].</p> <p>VP20, VP19 and VP5 are covered by CO.3 Responding to key views. CO.4 Responding to strategic views, has selected a subset of the key views based on proximity and providing a range of different aspects given the purpose is to assess the performance of the design in different lighting conditions and times of day. It is not considered that VP20, VP19 or VP5 are needed additionally.</p>
5.103 – 5.104	Substation Design Principle Friston	<p>The design principles for Friston substation are limited, and particularly if they are intended to be applied in Scenario 2, they appear incomplete and insufficient.</p> <p>SCC (Landscape) further considers that the mitigation proposals indicated in Document [AS-063] for Scenario 2 is currently insufficient and would require further detail to be developed. As currently shown, it is considered that the mitigation would not be reduce adverse landscape and visual effects to the same extent as the consented SPR scheme, which serve as a precedent for the site.</p>	<p>The Applicant disagrees that the design principles for Friston substation are incomplete or insufficient under Scenario 2. It should be noted, however, that the Design Principles were not written to be a control document or a management plan in the Sea Link application. Instead commitments on matters such as landscape, design, ecology, public rights of way, drainage and noise are secured in the Sea Link project predominantly in management plans secured by Requirement 6. These control measures are considered complete and sufficient for the construction of Friston under Scenario 2.</p> <p>The SPR scheme contains significantly more infrastructure than the Sea Link project at the Friston site; so the outline landscaping proposals across the three projects are not trying to mitigate the same effects. SPR is in the process of developing a detailed landscaping masterplan of the site to discharge their requirements; which we understand will be submitted to ESC imminently. Once this information is finalised, the Applicant aims to develop a version of this plan to show Sea Link. This will then increase the consistency between the projects, albeit there will remain differences due to the different development included in each application (i.e. the SPR applications have two additional substations and the Sea Link application additional HVDC and HVAC cables).</p> <p>See also Tables 2.3, 2.22 and 2.25 of 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p> <p>Further detail on the Friston substation design principles was also provided in Table 22.2.8 of 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>
Comments on application documents			
5.106 – 5.111	Document 6.3.2.1A: Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]	<p>The photomontage methodology (including anticipated growth rates) is acceptable.</p> <p>The assessment methodology could be more detailed, in particular regarding the derivation of sensitivity and magnitude of impact.</p> <p>SCC agrees with the Applicant's approach that any moderate or major effects should be considered as significant effects. SCC further considers that moderate-minor effects would be the effects that require greater scrutiny to determine whether they would need to be considered significant or not.</p> <p>SCC is of the view that, while the focus needs to be on significant effects, effects below the significance threshold should not be ignored. SCC considers that effects below the threshold can, in accumulation, become significant.</p>	<p>The Applicant notes the concluding paragraph 5.111 of this section which notes that the examination period should focus on further shaping the design and mitigation of adverse effects of the scheme and securing good outcomes for Suffolk rather than the assessment methodology. Whilst this is agreed, there are, however, several points made by SCC landscape, which require to be addressed as follows.</p> <p>There are no 'moderate-minor' effects reported within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048].</p> <p>It should be noted that where non-significant adverse effects have the potential to combine to become potentially significant adverse effects is dealt with in the intra-cumulative chapter (Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]) and would not occur for individual landscape or visual receptors.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>SCC notes that during pre-submission consultations, the Applicant did not take on board requests for additional viewpoints made by SCC, in particular around the converter station site and from The Layers. An additional viewpoint should be provided from The Layers, along footpath 20, from a location sufficiently elevated to convey the effects of the converter station, the access route, and the Fromus crossing within the setting of Hurts Hall and St John the Baptist Church. This should include the worst-case scenario of a 6m clearance height being required for the Fromus crossing bridge (as well as the scenario for 4m clearance height). SCC considers that such an additional viewpoint would provide detail not fully conveyed in viewpoints 2 and 20, as they do not include the church, and the crossing location may be more obscured. The additional viewpoint would also help to illustrate the sequential nature of the effects experienced by footpath users at The Layers.</p> <p>While being aware that the findings of the assessment depend on the foundation of the methodology, and while not fully aligned with the Applicant's approach, SCC considers that during the examination period the focus should be on further shaping the design and mitigation of adverse effects of the scheme and securing good outcomes for Suffolk.</p>	<p>It should also be noted that the comment around the Applicant not taking on board requests for additional viewpoints made by SCC is incorrect. A specific meeting was held on this subject outside of the regular landscape and visual thematic meetings on 10 September 2024 to discuss the reasoning for the requests and around proportionality of viewpoint representation.</p> <p>Specifically, for those requested within the landscape to the west of the proposed River Fromus crossing, photography was captured for the additional locations requested by SCC landscape (Viewpoints A, B and C) and are presented within 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]. This document sets out at 3.1.1 that <i>"the additional visualisations (Viewpoints A, B, and C) demonstrate that the original representative viewpoints (Viewpoints 2 and 20) used to inform the Landscape and Visual Impact Assessment (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) provided robust locations for representative viewpoints"</i> and at 3.1.5 that <i>"the updated visualisations further reinforce the conclusions in the Environmental Statement and demonstrate that these conclusions are unlikely to change as a result of minor changes as the detailed design progresses"</i>.</p>
5.112 – 5.115	Document 6.2.2.1: Environmental Statement Part 2 Chapter 1 Landscape and Visual [APP-048]	<p>SCC does not agree with the Applicant that the preferred access to the Saxmundham converter station site through the Fromus valley can be considered an embedded measure to reduce or avoid landscape and visual effects resulting from the scheme. SCC considers that alternative approaches, which would make use of other emerging infrastructure routes have not been fully explored by the Applicant.</p> <p>Since there is no commitment that trees within the cable corridor, which require removal to enable the scheme, will be replaced (at a ratio of 3:1) beyond the cable corridor, yet as close as possible, SCC does not consider that the proposals offer full reinstatement (first bullet point on page 77/80).</p> <p>While SCC acknowledges that the embedded measures have reduced or avoided some impacts (such as on veteran trees), SCC considers it unacceptable that no mitigation is proposed beyond these embedded measures, despite Table 1.10, Table 1.11, and Table 1.12 identifying significant effects.</p> <p>SCC considers that the Applicant should explore whether mitigative planting can further reduce the identified effects. Where this is not possible, compensation measures need to be considered.</p>	<p>The 'Embedded Measures' set out within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] outline measures being taken to reduce landscape and visual effects from the River Fromus bridge crossing. It does not state that the bridge crossing itself is an 'embedded measure' to reduce landscape and visual effects. Table 2.2 of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] should be referred to regarding alternative approaches.</p> <p>The oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]) commits to reinstatement of vegetation removal. Whilst trees that have been removed above the cable alignment cannot be replaced in situ, during the detailed design process tree planting within adjacent hedgerows where the Order Limits allow would be reviewed and included in the final Landscape and Ecological Management Plan where possible and appropriate.</p> <p>Section 2.4.16 of 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] should be referred to with regard to the Applicant's position in relation to compensation for residual landscape and visual effects.</p>
5.116 – 5.118	Document 6.2.2.12: Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]	<p>SCC (Landscape) disagrees with the Applicant's assessment of intra-cumulative effects on designated/non-designated sites. As the Sandlings SPA, Leiston-Aldeburgh SSSI and RSPB North Warren Reserve are located within the SECHNL, SCC considers that there are intra-cumulative effects on the SECHNL.</p> <p>SCC (Landscape) does not follow how the Applicant can base the assessment of effects of the scheme on visual amenity for recreational receptors and communities on two viewpoints (VP9 and VP11), which would experience, according to the assessment, minor adverse effects, and ignore those with</p>	<p>Regarding the intra-project cumulative assessment (Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]), the Applicant has agreed to provide further consideration to reporting of the intra-project cumulative effects which will be provided at a future examination deadline (9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]).</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>moderate or major adverse effects during construction (such as VP1, 2,3,4,5,6 (Scenario 2), 1519,20, 22 and 23 (Scenario 2). It is also difficult to follow, how this, in combination with noise disturbance, rights of way connectivity impacts, etc. does not add up to something greater than its parts, making these impacts and effects significant for recreational receptors and communities.</p> <p>The Applicant does in its summary acknowledge that in-combination effects, which by themselves are not significant, can become significant in combination. Such potentially significant intra-cumulative effects were identified for residential receptors for the Friston Scenario 2 (but not for residential receptors at Saxmundham, Benhall and Strenfield), for transport and transport users, for users of PRoW. Yet, for none of these has any mitigation been confirmed thus far. SCC would urge the Applicant to consider how these potentially significant intra-cumulative effects can be mitigated and share the envisaged measures at the earliest convenience. If the Applicant considers there to be no practicable mitigation measures, then compensatory measures such as enhancement of green infrastructure should be considered following the mitigation hierarchy.</p>	
5.119 – 5.120	Document 6.2.2.13: Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]	<p>SCC welcomes the Sequential Cumulative Visual Assessment provided in Table 13.36.</p> <p>However, SCC disagrees with the Applicant that adverse visual effects can be considered less severe, because they only affect a short stretch of a given route. SCC considers that the Applicant does not sufficiently take into account the perception of the changes, and the perceived scale of the changes experienced by various receptor groups. It seems that the Applicant has not considered that receptors move through time and space and will remember the accumulation of change they have experienced within the landscape. SCC considers that this could affect even the perception of areas and locations, that, in themselves, do not experience any effects at all.</p>	The consideration of a receptor that would only experience the Proposed Project for a short stretch of a route does reduce the magnitude of effect, regardless of the scale of the change. This is supported within the Landscape Institute's Technical Guidance Note 2024-01 (Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3)) (published August 2024). Furthermore, the Sequential Cumulative Visual Assessment considers situations in which receptor groups may experience repeated views along a recreational route, where different schemes and combinations of schemes may be visible at various points.
5.121 – 5.123	Document 6.10: Arboricultural Impact Assessment Part 1 of 2 [APP-294]	<p>SCC welcomes the Arboricultural Impact Assessment ("AIA") and the Applicant's commitment that no veteran or ancient trees are to be removed (para. 6.2.6). However, there remains concern with regards to the proximity of some of these trees to proposed works and the requirements for incursions into Root Protection Areas (Table 6.4 Veteran and Ancient Tree RPA Incursions). Appendix C Tree Survey Schedule Suffolk Onshore Scheme provides very helpful information. However, it would have been useful, if it could have been indicated in this table whether any given hedgerow was important under the 1997 Hedgerow Regulations. The extent of required pruning has not yet been determined. SCC would also ask that it is clearly defined, what pruning entails.</p>	<p>Noted.</p> <p>As detailed within Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294] clearance pruning is likely to be required along proposed access routes but is expected to be minor. The final extent of pruning will be detailed within an Arboricultural Method Statement which is secured via Requirement 8 of the 3.1draft Development Consent Order.</p>
5.124	Document 6.10: Arboricultural Impact Assessment Part 2 of 2 [APP-295]	SCC welcomes the Tree Protection Plan but considers that the line-type for the tree protection fencing is difficult to read and to differentiate from the line-type for the Root Protection Area. SCC also considers that additional areas may require protection. It is not clear whether the DCO boundaries will be fenced and thereby are intended to supplement Tree Protection Fencing.	This is noted by the Applicant. It is not the intention of the Applicant to fence off the entire Order Limits however all retained trees within proximity to works areas will be fenced off and protected. The final location of tree protection fencing will be detailed within an Arboricultural Method Statement and final Tree Protection Plans which are secured via requirement 8 in the 3.1 draft Development Consent Order .
5.125	Document 6.10: Arboricultural Impact	Appendix G Outline Tree Protection Measures: SCC (Landscape) welcomes the default specification for protective barrier (Appendix Plate G.1) and considers that the alternative of hi-visibility barrier tape fencing secured with timber stakes	This is noted by the Applicant. The application of a lower specification for tree protection fencing will be reviewed on a case-by-case basis and detailed within

Reference	Matter	Point Raised	Applicant's Comments
	Assessment Part 2 of 2 [APP-295]	(Appendix Plate G.2) will need to be justified for each location it is proposed for, as it would not withstand accidental incursions by larger vehicles and machinery.	an Arboricultural Method Statement and final Tree Protection Plans which are secured via requirement 8 in the 3.1 draft Development Consent Order .
5.126	Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans [APP-036]	SCC notes that the key to this plan only refers to Important Hedgerows (Hedgerow Regulation 1997), rather than all hedgerows. SCC would ask for clarification why 'other' hedges are not included, as it is expected that they would have been surveyed to identify those hedges that are important under the regulations. It appears that non-important hedges have been depicted on the plan but not mentioned in the key. While Important Hedgerow may require a different approach (such as minimising the working corridor or temporary trans-planting), all hedges affected need to be recorded and their loss appropriately mitigated or compensated.	Important Hedgerows are assessed in the Suffolk Ecology and Biodiversity Chapter and there are measures in the Register of Environmental Actions and Commitments relating to them, notably measure B31. Important Hedgerows are mapped in ES Figure 6.4.2.2.A ES Figures Suffolk Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) [AS-028] .
5.127	Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans [APP-036]	SCC further notes that the schedules for the hedgerows and information on the lengths likely to be lost are not readily available. There are hedges listed within the Tree Survey Table (Appendix C [APP-294]), but there is no differentiation between important and non-important hedgerows and no information on overall length. SCC had provided guidance with regards to recording hedgerows affected by the scheme at Statutory Consultation.	
5.128	Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]	SCC (Landscape) welcomes the principle of avoiding features of landscape and ecological value, and that it was possibly to avoid the loss of any veteran or ancient tree within the Suffolk Onshore Scheme. (Section 3.2).	The Applicant welcomes this comment.
5.129 – 5.143	Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]	<p>SCC (Landscape) is, however, concerned about the wording of some of the commitments included in the OCoCP and REAC:</p> <p>GG02: SCC considers that post consent there will be the need of a detailed overall LEMP prior to the Stage LEMPs. SCC (Landscape) considers that it needs to be made clearer that the contractor will need to comply with the agreed Stages Plans rather than with the Outline Planes approved at DCO consent, as the latter are produced to a Rochdale envelope and require refining (reducing impacts further where possible).</p> <p>GG04: The group of specialists the ECoW can call upon should include landscape architects.</p> <p>GG06: Please clarify the alternatives for aerial vs photographic footage. SCC considers that aerial photos of hedgerow will not provide sufficient information. SCC (Landscape) considers that the pre-condition survey should be made available to the relevant discharging authority and consultees, at submission of stage plans.</p> <p>GG07: SCC (Landscape) considers that the wording of this commitment is so ambiguous that it becomes meaningless. It would be helpful, if the Applicant were to clarify what other provisions of the DCO might be referred to here, and what 'similar style' means, with regards to hedges, fences, and walls.</p>	<p>The concerns around wording within the oCoCP (Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]) and REAC (Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) [REP1-102]) are noted. These are being reviewed and the requests for changes to these commitments are being considered by the Applicant.</p> <p>Construction of the Proposed Project cannot commence until the relevant requirements set out in the DCO have been discharged.</p> <p>The Applicant does not believe that the requirement of a 3:1 replacement planting has been raised before. This requirement has not been mentioned during any of the arboricultural or landscape thematic meetings and is not identified within SCC or ESC planning policy.</p> <p>The total area of canopy cover recorded by the tree survey is 709,821m² and the extent of canopy loss due to tree removal equates to approximately 47,903m². Therefore, the final extent of tree loss equates to approximately 6.74% of the surveyed canopy cover area (m²). However, as identified in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348 superseded by AS-059], there would be a long-term net increase in woodland habitat due to the Suffolk Onshore Scheme with a total area of 214,931 m². The Proposed Project therefore forms an opportunity to significantly increase the canopy cover within the Order Limits.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>GG08: SCC (Landscape) welcomes this commitment, but considers that the protective fencing should be in accordance with BS5837: 2012 Trees in Relation to Design, Demolition, and Construction.</p> <p>GG19: This commitment alone is insufficient to deal with store soil. It also does not relate to landscape features, will need buffer distances (i.e. no soils or other material storage within the RPA of trees and hedgerows).</p> <p>GG21: SCC (Landscape) recommends the use of warmer light, which can produce the same illumination levels.</p> <p>LV01: This is insufficient. Any trees that need to be removed to enable the scheme will need to be replace at a ratio of 3:1. If replacement is not possible at the same location, due to planting restrictions over the cables, replacement will need to be included elsewhere within the DCO or outside as compensatory planting.</p> <p>LV02: While SCC (Landscape) welcomes the commitment to protect trees in accordance with BS 5837:2012, the wording that follows for this commitment is unacceptable. The relevant working width needs to be adjusted as far as possible to work around the RPAs of trees within and without the DCO limits.</p> <p>LV05/LV06: Soils also need to be documented and should be stored replaced as close to the location of origin as possible.</p> <p>A03: works within 5m of any part of a retained tree should only 'occur', if it cannot be avoided; this should be clarified here.</p> <p>A04: the 5m distance s acceptable if it is in addition to RPAs and AW buffer zone (of no less than 15m).</p> <p>A05: SCC (Landscape) welcomes the retention of all veteran and ancient trees within and adjacent to the DCO limits.</p> <p>A06: This is acceptable provided that AMS and TPP are also agreed with the relevant local authorities.</p>	
5.144	Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]	Tree Works: SCC (Landscape) welcomes the commitments made in Section 3.5. However, it needs to be made clearer that the Applicant will endeavour to further reduce removal of trees at detailed design stage, post DCO consent.	<p>The commitment LV01 remains that '<i>The contractor(s) will retain vegetation where practicable</i>'.</p> <p>As detailed within Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294] tree loss has been assessed as a reasonable worst case (Rochdale Envelope) to allow flexibility in the final alignment of the Proposed Project within the Limits of Deviation and Order Limits as relevant.</p>
5.146 – 5.148	Landscape and Ecological Proposals	There is concern with regards to the effects of the proposed scheme on the consented outline landscape mitigation for the substations for SPR EA1 and EA 2 at Friston.	The Proposed Project will not undermine the effectiveness of the landscape mitigation set out for the consented EA1N and EA2 DCOs. The approved outline landscaping for the EA1N and EA2 projects is set out in the Outline Landscape

Reference	Matter	Point Raised	Applicant's Comments
		<p>From the information available it is not clear if and how the proposed scheme would fit in with, compromise or undo mitigation measures implemented through the SPR proposals. The conclusion drawn in paragraph 4.2.20 of Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093] that the landscaping works describe in paragraph 4.2.18 would not be required if the consented substations were built (Scenario 1), may be correct; however, other landscaping works would likely be required for any of the previous mitigation planting that may have been disrupted or undone and to integrated the additional infrastructure required by the proposed scheme with the other consented schemes at Friston.</p> <p>SCC (Landscape) is currently concerned that if the substation is built as part of the proposed scheme, the outlined proposed landscaping works of paragraph 4.2.18 may not be sufficient. Unfortunately, further comment by SCC has to be reserved until the landscape proposals, both for Friston and for Saxmundham are submitted as separate documents, as they appear to be such large files that they cannot be successfully viewed, but cause the document to freeze.</p>	<p>and Ecological Management Strategy (Version 08), 31 January 2022 (OLEMS). This outline strategy, which is reflective and proportionate to the findings of the EIA presented in the EA1N and EA2 project ES's, comprises reinforcement of historic hedgerows and small woodland block planting to provide screening from isolated properties and from users of the PRoW network, while providing a layered screening approach. It does not sterilise land for potential future development associated with the National Grid substation.</p> <p>The Applicant, in collaboration with SPR, is confident that detailed landscaping designs that accord with this outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables. The Order Limits and Limits of Deviation for the HVAC cables for Sea Link have deliberately been widened to provide significant flexibility to minimise any impacts on future planting. The Applicant is working closely with SPR to understand the interactions with emerging detailed designs and minimise these where possible.</p> <p>When SPR has submitted its detailed landscape masterplan, the Applicant will submit a plan demonstrating how the function of the landscaping can be retained with the cables in situ, including both the HVAC and HVDC cables. This has not been possible to date given that the landscaping plan for EA2 has not been finalised or released into the public domain. However, the Applicant is confident that interactions with areas of the EA1N and EA2 planting will not undermine the effectiveness of the landscape mitigation, and that where necessary minor revisions to the mitigation plan can be agreed.</p>
5.149	Grassland Reinstatement	SCC (Landscape) welcomes that soil from grassland field margins will be kept separately from that in the arable areas, which will enable the seed bank topsoil to be restored following works.	The Applicant welcomes this comment.
5.150 – 5.154	Hedgerow Reinstatement	<p>Paragraph 4.3.1 refers to temporary loss of hedgerows but omits mentioning hedgerows that might be lost to temporary access points.</p> <p>SCC welcomes that it will be attempted to temporarily translocate hedgerow, especially Important Hedgerows to replace them into their original location upon completion of construction (paragraph 4.3.20).</p> <p>SCC (Landscape) would however recommend smaller sizes, such as 60-90cm for hedging plants and feathered whips for tree replacement. The use of small standards should be reserved for key location or where agreed with landowners, as larger tree will require increased aftercare, such as regular watering, and often proof more difficult to establish than their younger counterparts.</p> <p>The suggested species list is broadly acceptable but appears to be limited. Additional tree species should be included for hedgerows beyond the cable corridor (see further below in the oLEMP for new planting).</p> <p>SCC considers that any tree from a young mature age onwards, that is lost to the scheme will require replacement planting of three new trees. This needs to be added to the catalogue of reinstatement measures.</p>	The detailed Landscape and Ecological Management Plan secured by requirement 6 of the draft DCO (Application Document 3.1 Draft Development Consent Order [REP1-036]) would address specific planting specifications and species mixes.

Reference	Matter	Point Raised	Applicant's Comments
5.155 5.157	Acid grassland reinstatement, restoration, and enhancement	<p>It appears that with regards to the reinstatement of acid grassland which needs to be stripped during construction, the Applicant's approach is to replace the soils and trust that the seedbank within the soils and windblown seeds will reinstate the acid grassland in approximately two years.</p> <p>Parallel to this, the Applicant proposes advance acid grassland creation (6ha) within the National Landscape. While the objectives are clear, no detail is given which measures will be employed to these.</p> <p>Provided the created acid grassland remains in situ in addition to the reinstated acid grassland, this could be considered to contribute to the discharge of the Duty under Section 85 A1 of the Countryside and Rights of Way Act 2000. SCC has stated its reservations over the sufficiency of the proposed measures to allow the duty to be discharged earlier in this chapter.</p>	Further information on the section 85 duty and how the Applicant complies with this duty is within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] .
5.158	Section 6.2 Management Periods	SCC considers that five years of aftercare may be considered sufficient for reinstatement of some types of grassland and hedges, but not for tree and woodland planting. SCC advocates an adaptive or dynamic aftercare regime, which is based on five years' worth of growth and establishment rather than five calendar years and welcomes Section 7.3 Adaptive Management Monitoring. SCC would welcome the opportunity to work with the Applicant to develop a suitable landscape aftercare supervision structure (see paragraph 7.3.3).	The five years of aftercare for reinstatement planting is considered to be standard and appropriate for reinstated planting along the cable corridor and landfall. This would be subject to adaptive management as secured in 7.3 of the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]). The great majority of tree and woodland planting would be managed for the lifetime of the Proposed Project as all mitigation planting associated with the permanent access road, River Fromus bridge, Saxmundham Converter Station and Friston Substation under Scenario 2 will be maintained for the lifetime of the asset. The detailed LEMP would be produced at the detailed design stage and discharged by the relevant planning authority under requirement 6.
5.159 – 5.161	Section 6.4 Implementation of Native Planting (General)	<p>SCC welcomes the commitment that planting will take place in the first available planting season following consent being granted, ideally during November and December for bare root stock, to reduce losses incurred during recent dry springs (paragraph 6.4.1). SCC assumes that consent in this context refers to the discharge of requirements for the relevant stage.</p> <p>If strimmers are to be used around new plants, the standard biodegradable tree or shrub guards is unlikely to provide adequate protection. Strimmer guards would be required. SCC welcomes the rationalisation of guards used in larger planting areas and supports the use of fencing as this has resulted in good outcomes elsewhere in East Suffolk. However, the fencing needs to be rabbit and deer proof.</p> <p>It is not clear, why hedgerow need to be maintained at a height of 2.5-3.5m.</p>	<p>The Applicant notes the recommendation to plant bare root stock during November and December to reduce plant losses and notes the point of planting taking place following discharge of requirements for the relevant stage.</p> <p>The requirement for fencing that is deer and rabbit proof is acknowledged and would be developed at the detailed design stage.</p> <p>The suggested height that hedgerows would be maintained is indicative of typical hedgerow management however, the detail of the management is subject to the development of the detailed design stage and detailed LEMP.</p>
5.162 – 5.163	Appendix A	SCC welcomes the cross- sections provided in Figure 2 of Appendix A of the oLEMP [AS-059] regarding the diverted PRow. However, It would have been useful, if there had been more measurements included, as the assumption that the site is entirely flat does also not reflect the actual site. With regards to the proposed 2m wide path within species rich neutral grassland, through native woodland (Section D-D), SCC considers that this is inadequate and not fit for purpose. The grassland corridor is approximately an estimated 5.6m wide. There is a realistic chance that the shrub layer at the woodland edges would encroach from both sides and fill the entire width of the corridor. Certainly, the canopy of	<p>The design of the diverted PRow within the outline landscape proposals will be developed as part of the future detailed design work stage. It would be presented both in the final LEMP and PRow Management Plan submitted under requirement 6.</p> <p>Saxmundham Section F-F is an illustrative section through the attenuation pond and adjacent PRow and proposed planting. The security fenceline is indicated on the section beyond which the converter station infrastructure would be located as indicated on Section E-E. The converter station lateral and vertical maximum parameters are not shown due to insufficient space on the section and the focus</p>

Reference	Matter	Point Raised	Applicant's Comments
		the maturing trees would close over the path. A more realistic starting point for a new PRow corridor would be a corridor with a width of 20m (which equates to over half the native woodland shown). SCC considers that these proposals need to be reconsidered by the Applicant.	of the illustrative section being the relationship between the attenuation pond and adjacent planting.
		Saxmundham Section F-F fails to show the converter station.	
5.164	Draft Development Consent Order ("dDCO") [AS087]	With regards to Article 52, part (3) (b) SCC queries, why the duty in section 206(1) of the 1990 Act (replacement of trees) should not apply. SCC considers that suitable arrangement should be made by the Applicant to replace each tree that is lost at a ratio of three for one, and that suitable locations for these replacement tree must be found	<p>A response to this comment can be found in Table 2.1.17 of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p> <p>The Proposed Project will require the part removal of one woodland (W12S) that is subject to TPO (ref: ESCC/54/00026) as identified within Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]. The area of W12S requiring removal equates to approximately 0.26% of the woodland group. Replacement tree planting for the loss of trees subject to a tree preservation order is not considered to be directly required however, mitigation for the loss of these trees will be secured via the tree planting as identified in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348 superseded by AS-059].</p> <p>The Applicant does not believe that the requirement of a 3:1 replacement planting has been raised before. This requirement has not been mentioned during any of the arboricultural or landscape thematic meetings and is not identified within SCC or ESC planning policy.</p> <p>The total area of canopy cover recorded by the tree survey is 709,821m² and the extent of canopy loss due to tree removal equates to approximately 47,903m². Therefore, the final extent of tree loss equates to approximately 6.74% of the surveyed canopy cover area (m²). However, as identified in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348 superseded by AS-059], there would be a long-term net increase in woodland habitat due to the Suffolk Onshore Scheme with a total area of 214,931 m². The Proposed Project therefore forms an opportunity to significantly increase the canopy cover within the Order Limits, with the number of trees planted being in excess of the proposed three for one ratio of planting requested</p>
5.165	Draft Development Consent Order ("dDCO") [AS087]	Schedule 3 Requirements, Retention and protection of existing trees and hedgerows, (2): SCC (Landscape) considers that this should also include Tree Protection Plans, that clearly identify the location and type of tree protection. SCC (Landscape) considers that this is required to enable an auditable system of compliance.	Requirement 8 (Retention and Protection of existing trees and hedgerows) requires that the Applicant submit an Arboricultural Method Statement to be approved by the relevant planning authority. This proposed Method Statement will include an updated set of Tree Protection Plans that reflect the detailed design of the project.
5.166	Draft Development Consent Order ("dDCO") [AS087]	Article 52 of the draft DCO aims to suspend the Hedgerow Regulations 1997 within the DCO limits. This requires a Schedule to be included in the DCO that accurately lists the important hedgerows that are to be removed or managed, with reference where these can be found on relevant plans (see for example Schedule 11 in the DCO for EA1N24).	Article 52 of the draft DCO (Trees subject to Tree Preservation Orders) deals with trees subject to a tree preservation order. Article 51 (Felling or lopping) applies to any tree, shrub, shrubbery, hedgerow or important hedgerow and article 51(9) confirms that the power conferred by paragraph (1) removes any obligation upon the undertaker to secure any consent to remove hedgerows under the Hedgerows Regulations 1997(a). The relevant hedgerows are shown on the Trees and Hedgerows to be Removed or Managed Plans, rather than in a schedule within the draft DCO.

Reference	Matter	Point Raised	Applicant's Comments
5.167	Draft Development Consent Order ("dDCO") [AS087]	There should be detailed design parameters included in the DCO to minimise impacts on tree and hedgerows such as information of the reduced working width, where important hedgerows are crossed.	<p>Detailed design of infrastructure projects should not be restricted where it is not necessary as this reduction in flexibility can often lead to perverse outcomes, such as restricting the ability of an Applicant to respond to changes in habitats, new information, new technology and to innovate to deliver better outcomes for projects. Therefore, it is best practice to commit instead to the environmental outcomes necessary, rather than restrict the detailed design of a project to achieve those outcomes.</p> <p>For example, the need to minimise impacts on trees and hedgerows are secured by:</p> <ul style="list-style-type: none"> Commitment B30 and B31 requiring set backs between important hedgerows (see Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]). Commitment GG07 requiring reinstatement of land after temporary uses, including hedgerows (see Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]). The Suffolk oLEMP which states: <i>'Once works are complete, temporary hedgerow gaps will be planted in the first available planting season post construction, with a combination of whips where hedgerows are reinstated over the cable corridor and whips and light standards or feathered trees beyond the cable corridor... For Important Hedgerows, it will be ensured there is no reduction in the number of woody species from the pre-construction situation. For Important Hedgerows soil material will also be kept separately from that for other hedgerows to enable the same soil to be restored (thus containing the same seedbank).'</i> (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Version 2, change request) [CR1-045]). Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294] provides a detailed assessment of the project on trees and provides proposals on tree protection; as well as details on new tree planting <p>It is therefore considered that there are already firm commitments in secured documents to minimise impacts on trees and hedgerows and no further restrictions on design are required.</p>
5.168 – 5.174	Document 7.5.3: Outline Onshore Construction Environmental Management Plan ("CEMP") [AS-127]	<p>The Toolbox talks (paragraph 3.3.6) should list tree and hedgerow protection, as this is not automatically included in environmental measures. SCC (Landscape) has concerns with the following measures presented in the REAC and CoCP (in addition to those discussed together with the oLEMP):</p> <p>LV003: SCC considers that the five-year aftercare programme needs to be outcome focused, i.e. the plants need to have established and show several years' worth of growth (adaptive aftercare).</p> <p>TT01 Should also refer to environmental receptors such as trees and hedgerows</p> <p>TT06: SCC would ask the Applicant to show that adverse impacts on vegetation resulting from highway improvements are appropriately considered, mitigated or,</p>	Adaptive management measures are committed to in the oLEMP, the detail of which will be developed further post determination in the full LEMP.

Reference	Matter	Point Raised	Applicant's Comments
		if required, compensated for. SCC welcomes these reassurances A07, A08, A09, A10, A15, A16, A17.	
5.175 – 5.180	Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS008]	<p>SCC (landscape welcomes that vegetation clearance is one of the factors considered in the design and placement of accesses and for routeing construction traffic.</p> <p>However, SCC (Landscape) considers that so far, the vegetation loss has not been fully minimised. Looking at Application Document 2.13.1 Design and Layout Drawings – Suffolk [APP-037], for example at Access S-BM07 (S-AP-12) off the B1121, the access is located between two road side trees, both of which are shown in Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans [APP-036] as to be removed and considerable lengths of important hedgerows are shown as to be managed (which is assumed to mean coppiced), although this is not apparent from the visibility shown on the General arrangement and visibility splays picture (THE NATIONAL GRID (SEA LINK) ORDER PINS APPLICATION NUMBER: EN020026 DESIGN AND LAYOUT PLANS - SUFFOLK: INDICATIVE BELLMOUTH ACCESS ARRANGEMENT S-BM07 (S-AP-12) REGULATION 5(2)(o) SHEET 1 OF 1 [APP-037]).</p> <p>The two trees to be removed are T635S* and T631S*, the hedgerow to be managed is identified as H641S*. (6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]).</p> <p>Tree 631S* is shown as Category A tree on the Tree Constraints Plan, Sheet 3 [APP-294]. This tree could potentially be retained if the access was moved further north-west along the B1121, so that only one tree (T635S*, Category B) would need to be removed.</p> <p>This is only one example and SCC(Landscape) would welcome the opportunity to work with the Applicant and SCC (Highways) colleagues to further minimise vegetation loss around accesses, including through temporary traffic management measures.</p> <p>SCC (Landscape) welcomes the details provided with the submission documents but considers that the access designs can only be taken as preliminary and should not be fixed as part of approved DCO documents.</p>	<p>The Applicant has worked with SCC (Highways) to agree the locations and geometry of the proposed access points, including undertaking Road Safety Audits at Stage 1 for preliminary designs. The location of accesses has been driven by safety, specifically considering visibility at the access locations, along with the need to access the project along its alignment. The Applicant has included proposals for vegetation removal and management at access points to ensure the project can provide the visibility required at the proposed accesses and this has been a specific focus of SCC (Highways) throughout the project development. However, the access designs are preliminary, and the Applicant is willing to work with SCC (Highways) and SCC (Landscape) to look for opportunities to minimise the impact on vegetation through the appropriate use of traffic management and other mitigations.</p> <p>With respect to BM07 (S-AP-12) the Applicant has aligned proposals with those brought forward by EA1N and EA2 which has been a consistent request from stakeholders throughout the project development. The Applicant anticipates that the access at Friston (Kiln Lane) substation will be that currently being designed (with inputs from the Applicant) as part of SPR's EA2 project. In the unlikely event that the access is not delivered by SPR, as above, the Applicant would welcome continued liaison with SCC (Highways) and SCC (Landscape) through the detailed design development of this access.</p>

4. Applicant’s Comments on Chapter 6: Ecology and Biodiversity

4.1 Introduction

4.1.1 This section provides the Applicant’s’ comments on Chapter 6: Ecology and Biodiversity

4.2 Comments Table

Table 4.1 Applicant’s Comments on Chapter 6: Ecology and Biodiversity

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
6.16	Construction Phase Impacts - Negative	There would be material impacts upon ecological features (designated sites, protected and priority species and habitats). This would include a swathe up to 78 m wide that would be disturbed due to the construction of underground cable sections of the route. Surface infrastructure construction would represent an intrusive feature that would impact upon ecology during construction.	The Applicant notes this comment and would wish to highlight that the 78 m wide swathe only applies between the Saxmundham Converter Station and Friston Substation.
6.17	Construction Phase Impacts - Negative	There are concerns about the potential impacts on the Haven Local Nature Reserve and the Leiston-Aldeburgh SSSI at the landfall site and these potential impacts should be assessed. If no impacts are anticipated, the Applicant should justify this in the Environmental Statement.	There is a detailed assessment of impacts on Leiston-Aldeburgh SSSI presented in Application 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]), which concludes no significant effect. As per that chapter, The Haven, Aldeburgh Local Nature Reserve lies on the coast approximately 600 m east of the closest surface construction works. Therefore, no significant effect of the Suffolk Onshore Scheme will arise.
6.18	Construction Phase Impacts - Negative	There are also concerns about the impacts on ecological features of the proposed works in and around the Benhall Railway Bridge. This site has high potential to be a bat migration corridor as the bridge is located along a well-vegetated linear corridor with strong links to the wider habitats in the area. Surveys for bat activity along the railway line should be undertaken and an assessment of potential roost features within the bridge should also be undertaken if the works will impact the bridge. Surveys for badgers and breeding birds to assess the potential impacts of the proposed works on the bridge and the surrounding habitats on these species. This will also help steer any mitigation/licencing measures that may be required.	An extended Phase 1 habitat survey was undertaken. This is presented in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] with the results presented in Application Document 9.76.5.10 Change Request Appendix J: Change 4 Phase 1 Habitat Survey Results [CR1-065] . Prior to any works being undertaken to the bridge, a bat roost potential survey will be undertaken from the rail line to review the low potential assigned and suitably assess the presence/likely absence of roosting bats to ensure legal compliance. The scrub on the rail embankment is also suitable for badgers, and as such this will require further survey prior to works commencing.
6.19	Operational Phase Impacts - Positive	Ecological enhancements designed to achieve Biodiversity Net Gain (BNG) and other Natural Capital benefits would be in place and would over the operational life of the development increasingly enrich the area. This is a requirement included in the Ofgem RIIO- 2 determination.	This is noted by the Applicant.
6.21	Operational Phase Impacts - Negative	There would be material impacts upon ecological features (designated sites, protected and priority species and habitats).	This comment does not explain what these material impacts would be. The submitted Application Documents conclude there will be no residual adverse effects on terrestrial ecology due to the Suffolk Onshore Scheme in the long-term.
6.24	Decommissioning Phase Impacts	There would be material impacts upon ecology. This would include parts of the swathe up to 78 m wide that would be disturbed due to the removal of	Decommissioning impacts have been assessed in Application 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]). Note that, as

Reference	Matter	Point Raised	Applicant's Comments
		underground cable sections of the route. Surface demolition would represent an intrusive feature that would impact ecology during decommissioning.	discussed in that Chapter, the cable and ducts may be left in situ and would not be removed by methods more damaging than their method of installation.
6.25		The potential impacts of the decommissioning works on the vegetated shingle habitat at the landfall site should be assessed. This site is both a National and Suffolk Priority Habitat as well as being a Local Nature Reserve (LNR) and a Site of Special Scientific Interest (SSSI). Avoidance measures should be drawn up if works will impact this area. If no impacts are anticipated, the Applicant should justify this reasoning in the Environmental Statement.	The Applicant can confirm that there will be no works on the vegetated shingle habitat.
Required Mitigation			
6.26	Protected Sites	The proposed landfall site and cable route is close to Suffolk Shingle Beaches County Wildlife Site, the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI and The Haven Local Nature Reserve.	This is noted by the Applicant.
6.27	Bird Species	The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which supports a variety of bird species, such as skylark, yellowhammer, bullfinch, woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna.	This is noted by the Applicant.
6.28	Qualified professional	In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant.	This is noted and welcomed by the Applicant.
6.29	Qualified professional	The Council welcomes the appointment of an Ecological Clerk of Works ("ECoW") and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group.	This is noted by the Applicant.
6.30 – 6.33	Quality of ecological surveys.	<p>The Council is generally content with the Applicant's suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.</p> <p>The Ecological Survey Reports appear to be of a good standard and consistent with CIEEM Guidelines.</p> <p>SCC requests that all survey data is sent to Suffolk Biodiversity Information Service.</p>	The Applicant notes that the Council is generally satisfied with its ecological surveys and associated reports. The Applicant is considering the Council's advice on deer management in relation to new planting. Paragraph 6.4.2 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] , does refer to use of deer fencing to protect planting.
6.33	Training	The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.	Paragraph 1.6.2 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] includes provision of 'toolbox talks' which the Applicant considers analogous to the requested Biodiversity Awareness Training.
6.34	Mitigation measures	The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and there-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.	This is noted by the Applicant. Section 7 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] discusses monitoring of the mitigation and planting.
6.35	Aftercare	The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.	This is noted by the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
6.36	Acid grassland restoration and enhancement	The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.	The acid grassland restoration and enhancement is proposed to be retained for ten years since it is mitigation for a temporary effect (loss of acid grassland to the proposed HDD launch compound) and the semi-improved grassland in the HDD compound area should have returned to a suitable condition well before ten years following restoration.
6.37	Combination with other NSIPs	The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060] discusses inter-project cumulative effects including on ecology, including with Sizewell C, Lionlink and a range of other projects within Table 13.27 and Table 13.37.
Comments on application documents			
6.47	Document 6.1: Environmental Statement Non-Technical Summary [AS-016]	Paragraph 1.7.1: SCC welcomes the Applicant's commitment to 10% Biodiversity Net Gain ("BNG").	The Applicant notes this comment.
6.48	Document 6.1: Environmental Statement Non-Technical Summary [AS-016]	Paragraph 3.5.5: SCC questions whether or not solar panels and/or green rooves are being considered for the various buildings (including substation and converter station) and would appreciate justification if not. At the least, permanent car parks should have solar panels above the parking spaces (as in, e.g., France).	Green roofs and solar panels are still under consideration however cannot be committed to at this stage due to the functional and operational requirements of a converter station. They are included as part of the consideration of the potential for planting within the converter station compound and the potential for on-site renewable energy generation, as discussed in Application Documents 7.11.1 Design Approach Document – Suffolk [APP-364] and 7.12.1 Design Principles – Suffolk [APP-366] .
6.49	Document 6.1: Environmental Statement Non-Technical Summary [AS-016]	Paragraph 3.5.17: SCC notes that the cable corridor width is 78 metres in Suffolk but only 40 metres wide in Kent. SCC would appreciate an explanation from the Applicant on this discrepancy of almost 100% between Suffolk and Kent. SCC would prefer the cable corridor to be as narrow as possible.	The typical cable corridor for the HVDC cable sections is 40m within Kent and Suffolk, this does not vary between the locations. The 78m cable corridor only relates to the section between the Suffolk Converter and the Suffolk Substation where the HVDC and HVAC cables run parallel to each other, requiring the wider typical corridor.
6.50	Document 6.1: Environmental Statement Non-Technical Summary [AS-016]	The suite of ecological surveys appear to be acceptable, but there is no mention of Deer. SCC considers it would be useful to understand what size populations of Deer are in (or move through) the area, to assist in the design of Deer management measures for the protection of planting schemes.	See above response on this matter
6.51	Document 6.1: Environmental Statement Non-Technical Summary [AS-016]	Paragraph 5.2.13: There is a report of one possible Dormouse nest but no other signs. SCC welcomes the precautionary approach for this species. Regarding Badger, this species has greatly increased in numbers and range in recent years. Unfortunately, their main predators are vehicles and incidents of Badgers being hit and either killed or injured are very prevalent. SCC would appreciate information regarding the measures the Applicant intends to implement to increase Badger numbers and deal with the inevitable further road casualties.	No specific measures to increase badger populations are proposed as part of the Proposed Development as this has focussed on mitigating negative impacts on badger. However, the substantial net increase in woodland around the converter station and substation will benefit badger.
6.52	Document 6.1: Environmental Statement Non-Technical	Paragraph 5.2.17: SCC appreciates the Applicant's recognition of the time required for planting to mature and welcomes the Applicant's acknowledgement that this may take time (especially bearing in mind the way that the seasons are much less reliable in terms of, e.g., rainfall, than in the past).	Noted

Reference	Matter	Point Raised	Applicant's Comments
	Summary [AS-016]		
6.53	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.7.31: In relation to the Applicant's reference to the possible part-built Dormouse nest, SCC considers that any encounters with Dormouse during this project would be a noteworthy event. SCC welcomes the Applicant's precautionary approach in relation to Dormouse but notes that this approach should include appropriate surveys around the possible part-built Dormouse nest to ensure the presence of Dormice is fully understood and mitigated appropriately.	Noted. Paragraph 7.1.1 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] and paragraph 1.5.7 of Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108] already identify that survey would need repeating prior to vegetation clearance.
6.54	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.8: SCC welcomes the appointment of an ECoW and considers that this is a critical role to deliver the biodiversity mitigation, compensation, and enhancement (including BNG).	Noted
6.55	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.2.28: List of Priority Habitats included in Suffolk Biodiversity Action Plan should include vegetated shingle, which is located at the landfall site between Aldeburgh and Thorpeness. This habitat is also a UK Priority Habitat.	Noted
6.56	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.9.42: SCC would anticipate that installation and removal of the noise fences would be done in consultation with the ECoW and, depending on the time of year, possibly under ECoW supervision.	Noted
6.57	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.9.59: SCC acknowledges that moderate adverse impacts on hedgerows are anticipated. SCC consider it essential for mitigation ideas to retain connectivity anxious to see that these are put in place and monitored.	Noted. Measures to retain connectivity are in the Suffolk oLEMP
6.58	Document 6.2.2.2: Environmental Statement Part 2	Paragraph 2.9.73: Bullfinch (Amber listed and a Priority Species for Suffolk) should be listed as a species that would use the arable land affected by the development	Noted but this paragraph only cited some examples of species.

Reference	Matter	Point Raised	Applicant's Comments
	Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]		
6.59	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.9.106: SCC welcomes the Applicant's proposal to close hedgerow gaps overnight with hurdles or similar. SCC would expect the Applicant to put in place a system of monitoring (for example, the ECoW) to ensure that these measures are fulfilling their intended function.	Noted. Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] sets out monitoring proposals in section 7.
6.60	Document 6.2.2.2: Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]	Paragraph 2.9.112: SCC welcomes the Applicant's proposal to use cowlings and similar to avoid light-spill. Again, SCC considers this would be another very useful function that might be offered by the ECoW.	Noted
6.61	Document 6.3.2.2.B: Environmental Statement Appendix 2.2B Suffolk Wintering Bird Report [PDA-025]	At Annex 2.B.2, SCC notes that the Desk Study Summaries give data for Kent rather than Suffolk. This should be rectified.	Noted
6.62	Document 6.3.2.2.B: Environmental Statement Appendix 2.2B Suffolk Wintering Bird Report [PDA-025]	Paragraph 1.3.21 states the last overwintering survey was winter 2023/2024. These surveys should be updated to give the most accurate picture of the number and variety of species using the habitats potentially affected by operations at the landfall site (in particular RSPB North Warren site).	Paragraph 7.1.1 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] already identifies that update surveys would be required prior to vegetation clearance as part of pre-construction work.
6.63	Document 6.3.2.2.B: Environmental Statement Appendix 2.2B Suffolk Wintering Bird Report [PDA-025]	Paragraph 1.3.24 states the surveys were targeted on species associated with the SPA/SAC/RAMSAR sites within the ZOI. As the cable route will also impact terrestrial habitats, any updated surveys should include Fieldfare (Red Listed) and Redwing, which both have been recorded overwintering in East Suffolk	While particular attention was paid to SPA/SAC/Ramsar species a detailed survey was undertaken of all species within the survey area.
6.64	Document 6.3.2.2.C:	Paragraph 1.3.13 - Field Survey Method states the last surveys were undertaken in 2024. These surveys should be updated in 2026 to reflect if any changes have	See above comments on update surveys prior to construction

Reference	Matter	Point Raised	Applicant's Comments
	Environmental Statement Appendix 2.2C Suffolk Breeding Bird Report	occurred to the diversity of species and number of birds recorded within the landfall and cable corridor route.	
6.65	Document 6.3.2.2.C: Environmental Statement Appendix 2.2C Suffolk Breeding Bird Report	Results section – no mention of numbers of Bullfinch recorded in the survey results. As these are Amber listed and a Suffolk Priority Species and should be included in any future surveys.	See above response on bullfinch
6.66	Document 6.3.2.2.C: Environmental Statement Appendix 2.2C Suffolk Breeding Bird Report	Paragraph 2.9.73 - the arable land to be lost to the development will also be of value to overwintering Starlings (Red listed species). This should be referred to in future publications.	Noted. This was not intended to be a comprehensive list
6.67	Document 7.5.3: Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]	Paragraph 2.4.5: It is suggested that protected species fencing might only be checked intermittently but, we believe, that such fencing must be checked daily by the ECoW (or a person suitably trained and instructed by the ECoW).	Noted
6.68	Document 7.5.3: Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]	Paragraph 2.4.8: Winter lighting should be installed under the supervision of the ECoW to ensure that no places that might offer refugia to Bats are lit.	Noted
6.69	Document 7.5.3: Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]	Paragraph 3.3.6: SCC welcomes the idea of toolbox talks but expects that Biodiversity Awareness should be in the list of subjects given. Seasonal tool-box talks would be of great benefit to the work force.	Noted – see above response on Biodiversity Awareness which is a key part of any ecological toolbox talk
6.73	Document 7.5.3.1: CEMP Appendix A Outline Code of Construction Practice [APP-341]	Table 1.1, GG04: SCC welcomes the appointments of an Environmental Manager and ECoW and assume that these posts will also be a part of the proposed Ecology Working Group (comprising the Applicant and key stakeholders).	Noted
6.74	Document 7.5.3.1: CEMP	Table 1.1, GG05: In addition to the topics set out in this paragraph, SCC would like the Applicant to add Biodiversity Awareness Training (delivered by the ECoW)	See above response on this.

Reference	Matter	Point Raised	Applicant's Comments
	Appendix A Outline Code of Construction Practice [APP- 341]	to ensure that construction workers are regularly kept up to date on what they might encounter and how to deal with issues that arise.	
6.75	Document 7.5.3.1: CEMP Appendix A Outline Code of Construction Practice [APP- 341]	Table 1.1, LV01: SCC welcomes the proposed native shrub planting and considers it essential that it is of suitable, local provenance.	The Applicant notes these comments.
6.76	Document 7.5.3.1: CEMP Appendix A Outline Code of Construction Practice [APP- 341]	Table 1.1, B07: SCC welcomes the Applicant's proposed innovative approach to mitigate impacts on, especially, Bats and considers that the success (or otherwise) of this initiative should be monitored.	
6.77	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP- 342]	Table 1.1, GG10: SCC understands that noisy operations must happen but would welcome a commitment to liaise with the ECoW to ensure that appropriate mitigation for protected species is in place.	
6.78	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP- 342]	Table 1.1, B12: SCC welcomes the re-use of trees that must be removed as a good initiative, but they must be appropriately monitored (in their "out of the Ground" phase and once replanted).	
6.79	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP- 342]	Table 1.2, LV11: SCC welcomes the orientation of the Saxmundham Converter Station to retain existing landscape features.	

Reference	Matter	Point Raised	Applicant's Comments
6.80	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.2, LV13: SCC welcomes the Applicant's commitment to enhancing habitats.	
6.81	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, GG04: SCC welcomes the appointments of an Environmental Manager and ECoW and assume that these posts will also be a part of the proposed Ecology Working Group (comprising the Applicant and key stakeholders).	
6.82	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, GG05: In addition to the topics set out in this paragraph, SCC would like the Applicant to add Biodiversity Awareness Training (delivered by the ECoW) to ensure that construction workers are regularly kept up to date on what they might encounter and how to deal with issues that arise.	Noted – see above comment on this point
6.83	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, LV01: SCC welcomes the proposed native shrub planting and considers it essential that it is of suitable, local provenance.	The Applicant notes these comments.
6.84	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, B07: SCC welcomes the Applicant's proposed innovative approach to mitigate impacts on, especially, Bats and considers that the success (or otherwise) of this initiative should be monitored.	

Reference	Matter	Point Raised	Applicant's Comments
6.86	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, GG10: SCC understands that noisy operations must happen but would welcome a commitment to liaise with the ECoW to ensure that appropriate mitigation for protected species is in place.	
6.87	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.1, B12: SCC welcomes the re-use of trees that must be removed as a good initiative, but they must be appropriately monitored (in their “out of the Ground” phase and once replanted).	
6.88	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.2, LV11: SCC welcomes the orientation of the Saxmundham Converter Station to retain existing landscape features.	
6.89	Document 7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]	Table 1.2, LV13: SCC welcomes the Applicant's commitment to enhancing habitats.	
6.90	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	Paragraph 1.2.4: SCC welcomes that the Outline Landscape and Ecological Management Plan (“OLEMP”) is a live document that will be updated and refined and considers that the proposed Ecology Working Group will also be able to discuss and agree updates.	
6.91	Document 7.5.7.1: Outline Landscape and Ecological	Paragraph 1.2.4: SCC looks forward to seeing the planting scheme and commenting on this, but considers that, because of the erratic nature of Suffolk's weather patterns (especially in Spring), a ten-year aftercare period would be considerably more appropriate than five years. Any species planted must be	

Reference	Matter	Point Raised	Applicant's Comments
	Management Plan - Suffolk [AS-059]	native and ideally of local provenance to give them the best chance of establishing successfully.	
6.92	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	Paragraph 1.5: SCC welcomes the Applicant's OLEMP objective to diversify ecological value through restoration.	
6.93	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	SCC welcomes the Applicant's acknowledgement of impacts on various species and habitats, for example Skylark, as well as the proposals to mitigate connectivity issues for Bats. SCC considers that these should be monitored and reports made to the Ecology Working Group.	
6.94	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	Table 5.1: Hornbeam (<i>Carpinus betulus</i>) should be added to the Woodland mix, although SCC notes that it is mentioned in Table 5.3: Native Hedgerows. All plants should be locally sourced and of suitable provenance.	
6.95	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	Paragraph 5.3.2: SCC considers that the acid grassland restoration and enhancement area should be maintained in perpetuity, rather than the proposed ten years. Acid grassland take at least 5 years to establish fully, and a 5-year aftercare period would be insufficient if the condition of the acid grassland falls below the agreed standard in that time. Paragraph 5.4.44 of EN-1 states that habitat creation or enhancement relating to biodiversity net gain should be maintained "for a minimum period of 30 years, or for the lifetime of the project, if longer." If that is not feasible, then management must continue until such time as the restored areas have met the standard agreed, for example by the Ecology Working Group.	Noted – see above comment on this.
6.96	Document 7.5.7.1: Outline Landscape and Ecological Management Plan - Suffolk [AS-059]	Paragraph 6.5: SCC are very interested in the details of planting schemes and the monitoring and management that is put in place. Again, the Ecology Working Group will be the ideal forum for the Applicant and key stakeholders to discuss any issues and suggest revised prescriptions. SCC notes that it cannot see anywhere in the documents mention of Deer monitoring and management. The planting proposed will be very vulnerable and the Applicant should gain an understanding of the local Deer populations and their movements around this area and devise strategies to protect the new planting.	The Applicant notes these comments.
6.97	Document 7.5.7.1: Outline Landscape and Ecological	Paragraph 6.8.9 - botanical surveys should take place between May and August (optimal botanical survey window) in order to attain an accurate picture of how successfully the sward has established.	

Reference	Matter	Point Raised	Applicant's Comments
	Management Plan - Suffolk [AS-059]		

5. Applicant’s Comments on Chapter 7: Cultural Heritage

5.1 Introduction

5.1.1 This section provides the Applicant’s comments on Chapter 7: Cultural Heritage

5.2 Comments Table

Table 5.1 Applicant’s Comments on Chapter 7: Cultural Heritage

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
7.32	Construction Phase Impacts – Negative	A large number of the proposed areas for this scheme fall within locations where below ground archaeological remains of significance have been defined through geophysical survey and trial trenched evaluation, with high potential for additional below ground heritage assets to survive within parts of the scheme red line boundary which have not been subject to full archaeological assessment. Construction of surface infrastructure and underground cables, alongside any pre-commencement works or works related to the scheme which involve ground disturbance, will therefore lead to loss of archaeological remains in many areas. Without appropriate mitigation, the negative impact upon cultural heritage will be significant.	The Applicant notes these comments.
7.33	Construction Phase Impacts – Negative	The archaeological implications of multiple schemes in this landscape are cumulatively increasing for every project. The inclusion of options for coordination with other projects within proposals would increase impacts as it reduces the flexibility to be able to avoid significant archaeology.	
7.34	Construction Phase Impacts – Negative	There would be direct and indirect material impacts upon heritage assets, including the partial or complete removal or surviving below ground remains in many areas of the scheme, due to works proposed which involve significant ground disturbance.	
7.36	Operational Phase Impacts – Neutral	Underground cable sections of the route would overtime meld into the landscape.	
7.37	Operational Phase Impacts – Negative	Impacts upon the setting of heritage assets from surface infrastructure would remain throughout operation.	
7.38	Operational Phase Impacts – Negative	Any works during site operation involving additional below ground disturbance have the potential to have a direct impact upon any archaeological remains not previously mitigated as part of the construction phase e.g. should works be necessary in any areas where preservation in situ has been utilised as a mitigation strategy.	The Applicant notes this comment.
7.41	Decommissioning Phase Impacts – Negative	Any works during site decommissioning involving additional below ground disturbance have the potential to have a direct impact upon any	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
		archaeological remains not previously mitigated as part of the construction phase e.g. should works be necessary in any areas where preservation in situ has been utilised as a mitigation strategy.	
Required Mitigation			
7.42	Built heritage / archaeology split	Matters relating to Built Heritage are led by East Suffolk Council, however, other elements related to the historic environment, such as those relating to Archaeology matters, are provided below.	The Applicant notes this comment.
7.43	Heritage setting	Landscaping of surface infrastructure and the cable route, alongside other appropriate mitigation measures, will be required to preserve the setting of above ground heritage assets.	The Applicant notes this comment.
7.44	OWSI requirements	All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation (“OWSI”). The submitted OWSI is currently in draft form and comments by SCC Archaeological Service (“SCCAS”) (below) need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation (“WSIs”) following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all subsequent WSIs/contractor method statements would need to be approved by SCCAS.	<p>The Applicant notes this comment.</p> <p>An updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] is being prepared based on comments received from SCCAS and Historic England. This will be revised further as the final design develops, and as final fieldwork reports are received, including the archaeological evaluation near the ‘G-Shaped’ enclosure near Friston, and geo-archaeological works proposed as part of the Ground Investigation works.</p> <p>The updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted, after a final review from SCCAS and Historic England, before the end of the examination period.</p>
7.45	Geophysics results	Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin.	The Applicant notes this comment.
7.46	Trial trenching phases	In communication with NGET’s consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.	<p>The Phase 1 archaeological trial trench evaluation report was submitted as part of the DCO Application (Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]) and Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]; Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase Archaeological Evaluation Report Extract illustrating the location of the henge in relation to the proposed scheme [AS-137].</p> <p>Further trial trench evaluation (Phase 3) is currently being undertaken (November/December 2025), and the results will be published before the end of the examination.</p> <p>The results of these works will be detailed in a report submitted before the end of the examination.</p> <p>Mitigation will be agreed with SCCAS, and detailed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] which will be submitted prior to the end of examination.</p>

Reference	Matter	Point Raised	Applicant's Comments
7.47	Further evaluation areas	<p>SCCAS consider that any remaining areas within the Order Limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project and any additional areas subsequently added to the Order Limits. All site accesses, haul roads, compounds, and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined.</p>	<p>Noted. The updated OWSI includes provision for the further evaluation of areas not included in the earlier Phase 1 and 2 evaluations. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] includes provision for the production of site-specific written schemes of investigation which will detail appropriate mitigation measures based on the results of further evaluation, and which will be agreed with the Archaeological Advisor to the local planning authority from SCCAS. Consultation will continue with stakeholders throughout this process.</p>
7.48	Directional drilling impacts	<p>For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.</p>	<p>The Applicant notes this comment. The archaeological watching brief report that formed part of Application Document 6.3.2.5.D ES Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119] will be forwarded to SCCAS. This scope of the archaeological watching brief was agreed with SCCAS who approved the WSI, and the report details the findings of the watching brief.</p>
7.49	Saxmundham mitigation approach	<p>The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and Lion Link). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and Lion Link at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.</p>	<p>The Applicant notes this comment.</p>
7.50	Friston mitigation requirements	<p>At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within the submitted documentation.</p>	<p>The Applicant notes this comment.. Archaeological mitigation areas will be illustrated in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] and agreed with the Archaeological Advisor to the local planning authority from SCCAS. The updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted prior to the end of examination.</p>
7.51	Use of EA1N/EA2/Lion Link data	<p>Given the interaction with the EA1N/EA2 and Lion Link schemes, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme.</p>	<p>The Applicant notes this comment. Data has been shared between projects where possible and appropriate, and the projects will continue to liaise.</p>
7.52	Data-sharing / coordination	<p>The Council understands that NGET (Sea Link) and National Grid Ventures (“NGV”) (Lion Link) are looking into a data sharing agreement. The Council supports this as it would avoid duplication of effort. Co-operation with SPR also be beneficial, given the overlapping nature of this scheme with the EA1N/EA2 project.</p>	<p>The Applicant notes this comment. Data has been shared between projects where possible and appropriate, and the projects will continue to liaise</p>
7.53	Preservation in situ strategy / HEMP	<p>Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-</p>	<p>The Applicant notes this comment. Further consultation will be undertaken with stakeholders to agree the methodology relating to preservation in situ. This will include requirements in the Construction Environmental Management Plan</p>

Reference	Matter	Point Raised	Applicant's Comments
		commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.	(CEMP), as well as the Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] and HEMP.
7.54	Friston monument reinterpretation	At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ., further to the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable.	The Applicant notes this comment. The additional geophysical survey that has been undertaken on the 'G-Shaped enclosure' has been submitted to stakeholders and the Planning Inspectorate (Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]). Archaeological evaluation trenching is currently being undertaken (November / December 2025), and the results will be incorporated in a Supplemental Environmental Assessment report before the end of examination. The design of the Suffolk Onshore Scheme will seek to avoid the asset completely thereby removing the potential for physical impacts. However, the Applicant acknowledges that if impacts are unavoidable the entire asset will need to be subject to detailed archaeological excavation. This approach has been agreed with the Archaeological Advisor to the local planning authority from SCCAS and will be detailed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] which will be submitted prior to the end of examination.
7.55	Need for full excavation / expand Order Limits	However, given the potential to contain settlement evidence and other remains, SCCAS would advise that a partial excavation of just the central portion of this feature would not be appropriate or in line with best practice and this monument would therefore need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route. The original Order Limits would not allow for this and therefore we would advise the need for a slight expansion of the scheme Order Limits around this monument to facilitate full excavation of the enclosure and any associated internal and external remains. This would, however, only need to be a fairly localised expansion and remove the need for further assessment work at this stage.	
7.56	Route changes / evaluation requirement	If the Applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, SCCAS do not object to the expansion of the Order Limits in line with the areas proposed in an additional submission. SCCAS are pleased that geophysical survey has now been completed for these new areas, however, further anomalies of likely archaeological interest have been defined, along with the potential for further unknown archaeological remains which have not been able to be detected. As such, any changes to the route beyond a small increase around the D-Shaped enclosure, would require a programme of trial trenched archaeological evaluation prior to the determination of the DCO, in order for the nature, extent and significance of any archaeological remains to be defined and to allow appropriate archaeological mitigation strategies to be determined and also informed design and planning decisions to be made.	
7.57	Buxlow lost church — preserve in situ	To the west of Grove Road at Friston, the Order Limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the	The Applicant notes this comment. The preservation of this asset has been agreed with the Archaeological Advisor to the local planning authority from SCCAS, and is detailed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] which will be submitted prior to the end of the examination.

Reference	Matter	Point Raised	Applicant's Comments
		DCO Order Limits as part of the Sea Link project, in line with preservation in situ requirements.	
7.58	Programming / timing of works	As has been shown by other Nationally Significant Infrastructure Projects (“NSIPs”) in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule.	The Applicant notes this comment. A programme for mitigation is currently being developed by the Applicant as part of t updates.
7.59	Contractor capacity	Numerous large projects taking place in the county at the same time is putting significant pressure on available archaeological work forces. Therefore, SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity.	The Applicant notes this comment.
7.60	DCO Requirement 14 wording	SCCAS are not currently in agreement with the proposed wording of DCO Requirement 14 and amendments are necessary (see below comments) for agreement to be reached. SCCAS would also recommend amendment to the clause relating to human remains.	The Applicant notes this comment.
7.61	Outreach strategy requirement	Finally, although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.	The Applicant notes this comment. The Applicant will continue to liaise with stakeholders including SCCAS to develop an Archaeological Outreach Strategy. Provision for this is set out in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.62	Need for document changes	SCCAS has reviewed the relevant control documents and provides comments as follows. These comments should be addressed by the Applicant with appropriate changes made to the relevant documents to ensure impacts on cultural heritage are adequately avoided or mitigated.	The Applicant notes this comment.
Comments on application documents			
1.1 [sic]	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.4.9 Some parts of the scheme have not yet been subject to trial trenching, and the submitted trench report is for the P1 trenches only, with the P2 trench report still pending	The Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] , Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase 2B Archaeological Evaluation Report Extract illustrating the location of the henge in relation to the proposed scheme [AS-137] have been submitted to SCCAS and the Planning Inspectorate. Further works (Phase 3) are currently being undertaken (November/December 2025), and the results will be published before the end of the examination. The results of these works will be details in a Supplemental Environmental Assessment report submitted before the end of the examination.
7.64	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.4.29 Multi-period archaeological remains have been defined, with features dated to all periods recorded.	The Applicant notes this comment.
7.65	Document 6.2.2.3: Environmental	3.4.31 As long as there are no preparation works involving ground disturbance to create areas of grassland, plans do not change in these areas to include	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
	Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	alternative ecological mitigation measures involving ground disturbance and no additional mitigation areas are subsequently deemed as necessary beyond the current Order Limits.	
7.66	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.5.6 Areas which are being preserved in situ as part of the EA1N/2 project will not have already had impacts mitigated and therefore should impacts be planned in these areas as part of this project, Sea Link will be responsible for undertaking appropriate mitigation.	The Applicant notes this comment.. This will be examined further as Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] is updated and mitigation areas are fully agreed with SCCAS.
7.67	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.7.24 Additional multi-period remains have also been recorded during the P2 works but are not yet included in assessments.	The Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] , Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase 2B Archaeological Evaluation Report Extract illustrating the location of the henge in relation to the proposed scheme [AS-137] have been submitted to SCCAS and PINS. Further works (Phase 3) are currently being undertaken (November/December 2025), and the results will be published before the end of the examination. The results of these works will be details in a Supplemental Environmental Assessment report submitted before the end of the examination.
7.68	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.7.42 Although quite a few additional remains were recorded that had not been detected through geophysical survey.	Comment noted, although in most cases the archaeological evaluation trenching confirmed the anomalies identified by the geophysical survey.
7.69	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.7.45 Again it should be noted that currently only the results of the P1 trenching works are available and that additional remains to those summarised in this section were however recorded during the P2 trenching work.	The Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] , Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase 2B Archaeological Evaluation Report Extract illustrating the location of the henge in relation to the proposed scheme [AS-137] have been submitted to SCCAS and PINS Further works (Phase 3) are currently being undertaken (November/December 2025), and the results will be published before the end of the examination. The results of these works will be detailed in a report submitted before the end of the examination.
7.70	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.7.46 Please can a copy of the GI report be provided to SCCAS as soon as possible as this has not yet been provided to SCCAS. For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood.	The Applicant notes this comment. This report will be submitted to SCCAS.
7.71	Document 6.2.2.3: Environmental Statement Part 2	3.9.5 What about features of interest recorded during P2 trenching and additional features identified by SCCAS from P1 trenching as requiring mitigation? Also, there is potential for additional features of interest to be recorded in any areas where trenched evaluation has not yet been completed. This assessment can only be	The Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] , Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase 2B Archaeological Evaluation Report

Reference	Matter	Point Raised	Applicant's Comments
	Suffolk Chapter 3 Cultural Heritage [APP-050]	considered as a partial, point in time, assessment at present and this should be recognised.	Extract illustrating the location of the henge in relation to the proposed scheme [AS-137] have been submitted to SCCAS and the Planning Inspectorate. Further works (Phase 3) are currently being undertaken (November/December 2025), and the results will be published before the end of the examination. The results of these works will be detailed in a report submitted before the end of the examination. Mitigation will be developed through continued engagement with SCCAS and detailed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] which will be submitted prior to examination.
7.72	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.9.10 Impacts to areas identified as of archaeological interest, even those of local significance will be high without appropriate mitigation, given complete or substantial removal of remains will occur as part of works associated with this scheme (unless preservation in situ is achievable).	Noted
7.73	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.9.89 Measures would need to be in place during site operation to protect any areas of archaeology mitigated through preservation in situ.	Noted and agreed.
7.74	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.9.119 Measures would need to be in place during any decommissioning activities to protect any areas of archaeology mitigated through preservation in situ.	The Applicant notes this comment.
7.75	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.10.2 H05 Areas of archaeological remains to be preserved in situ will require a detailed Historic Environment Management Plan (HEMP) which sets out the strategy for the ongoing protection of these remains throughout construction, operation and in perpetuity.	The Applicant notes this comment. Further consultation will be undertaken with stakeholders to agree the methodology relating to preservation in situ. This will include requirements in the Construction Environmental Management Plan (CEMP), as well as the Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] and HEMP.
7.76	Document 6.2.2.3: Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	3.10.2 Also completion of trial trenched evaluation required in areas where this has not already been undertaken, followed by suitable mitigation as appropriate.	The Applicant notes this comment. This will be agreed as part of the final Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] once the final design is understood.
7.77	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	5.1.3 Given remains dating to both the Neolithic and Bronze Age periods have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
7.78	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	5.1.4 Given remains dating to both the Iron Age and Roman periods have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.	The Applicant notes this comment.
7.79	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	5.1.5 Although no remains of Saxon date have been identified so far during evaluation works, features of this date are often not easy to detect by geophysical survey and are easily missed by trial trenching. In addition, numerous Saxon remains have been identified during archaeological investigations nearby to a number of sections of this scheme as part of the EA1N/2 project and so SCCAS do not agree that there is negligible potential for Saxon remains.	The Applicant notes this comment.
7.80	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	5.1.6 Given remains dating to medieval period have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.	The Applicant notes this comment.
7.81	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	5.1.7 Given remains dating to the post-medieval period, in particular military remains, have been defined during evaluation work and are included within areas which have been defined as requiring mitigation, there is moderate to high potential for further remains of this date to be identified during ongoing archaeological works.	The Applicant notes this comment.
7.82	Document 6.3.2.3.A: ES Appendix 2.3A Cultural Heritage Baseline Report [APP-109]	6.2 What about features of interest recorded during P2 trenching and additional features identified by SCCAS from P1 trenching as requiring mitigation? Also, there is potential for additional features of interest to be recorded in any areas where trenched evaluation has not yet been completed. This assessment can only be considered as a partial, point in time, assessment at present and this should be recognised.	<p>The Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135], Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] and Application Document 9.3.3 Suffolk Section Phase 2B Archaeological Evaluation Report Extract illustrating the location of the henge in relation to the proposed scheme [AS-137] have been submitted to SCCAS and PINS.</p> <p>Further works (Phase 3) are currently being undertaken (November/December 2025), and the results will be published before the end of the examination.</p> <p>The results of these works will be submitted before the end of the examination.</p> <p>Mitigation will be developed through continued engagement with SCCAS.</p>
7.83	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	The submitted OWSI is currently in draft form and comments by SCCAS (below) need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.	<p>The Applicant is in the process of updating Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] and this will take into consideration comments raised by SCCAS and Historic England.</p> <p>An updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted prior to the end of examination, and site specific WSIs will be produced as the mitigation strategy develops.</p>
7.84	Document 7.5.4.1: Outline Onshore Overarching	Throughout the document there are multiple references to ‘the Archaeological Advisor to SCCAS.’ In all instances, this should be ‘the Archaeological Advisor to the LPA from SCCAS.’	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]

Reference	Matter	Point Raised	Applicant's Comments
	Written Scheme of Investigation (OWSI) – Suffolk [APP-343]		
7.85	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	Executive summary: a statement needs including regarding that following approval of the Outline Onshore Overarching WSI, that site specific WSIs will be produced which set out detailed evaluation and mitigation requirements for the scheme. SCCAS's preferred approach would be that a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. These documents will need approval by SCCAS.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]
7.86	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	1.3.1 For clarity this should say 'archaeological heritage assets' given that Built Heritage is not dealt with in this document.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.87	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	1.5.4 As well as during construction works, also during any other pre-commencement works.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.88	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	Table 3.1 of the CEMP will need updating to include relevant archaeological roles and responsibilities.	The Applicant notes this comment.
7.89	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	Non-designated assets section: should be mentioned that areas of multi-period remains (dating from the Neolithic onwards) were also scattered throughout the scheme Order Limits, and also that additional non-designated heritage assets were recorded during the P2 trenching works, the results of which are not yet available.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.90	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation	2.4.3 General research aims relating to military remains would also be appropriate.	The Applicant notes this comment. This will be addressed in the updated OWSI.

Reference	Matter	Point Raised	Applicant's Comments
	(OWSI) – Suffolk [APP-343]		
7.91	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.1.2 All areas of the scheme where ground disturbance will take place, and which have not previously been subject to evaluation will need to be scoped in for trial trenching. Any ecological mitigation areas which involve ground disturbance, site accesses, haul road, and compounds will also require trial trenched evaluation if they have not already been included within previously evaluated areas.	The Applicant notes this comment.
7.92	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.1.3 The SCCAS geophysical survey and evaluation guidance 2025 and East of England fieldwork requirements document should both be referenced here.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.93	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.2.3 OR full excavation. An archaeological watching brief would not be acceptable; however, a programme of continuous archaeological monitoring and recording may be acceptable in some circumstances. These works would need to be covered by either an addendum to the project wide mitigation WSI/ site specific contractor method statements or an additional method statement.	The mitigation strategy will continue to be developed through consultation with SCCAS, with the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] including a figure detailing mitigation areas agreed with SCCAS.
7.94	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.3.1 (and 4.2.6) SCCAS ask for 30m x 1.8m trenches as standard.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.95	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.3.2 As above, SCCAS's preference is for an overarching WSI which sets out ongoing evaluation and mitigation requirements for the entire onshore scheme in Suffolk, supplemented by site specific contractor method statements for individual areas of archaeological assessment/mitigation. These documents will need approval by SCCAS.	The Applicant notes this comment.
7.96	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	3.3.3 OR full excavation/ a programme of continuous archaeological monitoring and recording which may be acceptable in some circumstances (preservation in situ measures might also require fencing off areas and avoidance of ground disturbance within defined areas etc).	The mitigation strategy will continue to be developed through consultation with SCCAS, with the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] including a figure detailing mitigation areas agreed with SCCAS.
7.97	Document 7.5.4.1: Outline Onshore	Section 3 also needs to set out that for the area east of landfall which will be subject to directional drilling, appropriate assessment of deposits in this area will	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
	Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	need to take place to enable the potential impacts of planned works to be fully understood.	
7.98	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.1 The need for a joined-up approach to mitigation at both the Saxmundham Converter Station and Friston substation and a collaborative approach with the EA1N/2 and Lion Link projects should also be set out here.	The Applicant notes this comment. The updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will include measures for a collaborative approach to mitigation where this is feasible.
7.99	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.1.1 Excavation needs removal from end of second sentence. This paragraph should set out that where PIS is not possible that preservation through record will be used as an alternative mitigation strategy for heritage assets defined during archaeological assessment works.	The Applicant notes this comment. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .
7.100	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.1.2 Also preserve by record any remains which are unable to be preserved in situ and therefore will be removed or damaged by the development.	Agreed.
7.101	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.1.7 Prior to the production of contractor method statement, a site specific WSI will also be required- SCCAS preferred project wide approach to this is outlined above.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly.
7.102	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.1 should be moved to section 3 as part of ongoing evaluation requirements.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly.
7.103	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation	4.2.2 – 4.2.9 again should be incorporated into section 3 as evaluation not mitigation.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly

Reference	Matter	Point Raised	Applicant's Comments
	(OWSI) – Suffolk [APP-343]		
7.104	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.10 This should be continuous archaeological recording and not monitoring/watching brief. Constant archaeological monitoring of all works would be necessary.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.105	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.16 This should be strip, map, and record not sample.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.106	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.22 Including provision to extend areas should significant archaeological remains be defined.	Noted, although it should be acknowledged that extending areas will be limited to land within the Order Limits.
7.107	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.22 and 4.2.26 30m buffer zones should be left around defined excavation and strip, map areas to allow for extension as appropriate and to guide the location of spoil storage. These buffer zone areas must also be excluded from any works involving ground disturbance until signed off by SCCAS and handed back to the developer.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.108	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.2.27 the sampling strategy may need to be refined based upon what is found once the site is stripped (as in point 4.3.18)	Agreed. This will be updated as the mitigation strategy is developed.
7.109	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	Section 4 should also set out that preservation in situ is another mitigation strategy which may be used and this section should outline how for any features which are either to be preserved in situ as part of project design or for any features of national significance defined during ongoing evaluation work, that the strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (HEMP), to be agreed with SCCAS, in order to secure the appropriate management of these remains.	The Applicant notes this comment. The requirement for a HEMP will be included in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] .

Reference	Matter	Point Raised	Applicant's Comments
7.110	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.2 Individual codes will be required for each sperate mitigation area.	Agreed.
7.111	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.15 Should complex archaeology or sensitive remains such as human remains be defined during trial trenched evaluation, the strategy for investigation at this stage should be agreed with SCCAS.	Agreed
7.112	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.17 Ring ditches should be at least 50% excavated. Industrial features should be 100% excavated. Any SFBs defined should be dug in quadrants, with opposing quadrants removed first, followed by full excavation.	Agreed
7.113	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.27 the HE 2011 Environmental guidance should be referenced here.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.114	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.30 The Applicants needs to clarify whether they are using the 2017 guidance.	The Applicant notes this comment.. This will be confirmed in the next version of the Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] ., with the most up to date guidance used.
7.115	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	4.3.37 The receiving archive will be the SCCAS archive so the SCCAS archive guidance 2024 needs referencing here.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.116	Document 7.5.4.1: Outline Onshore Overarching	4.3.44 The Suffolk FLO should immediately be informed, and the coroner will need to be notified within 14 days.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly

Reference	Matter	Point Raised	Applicant's Comments
	Written Scheme of Investigation (OWSI) – Suffolk [APP-343]		
7.117	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	5.1 We know that human remains are present in a number of areas of the scheme and therefore this section should be moved to the end of section 4.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.118	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	5.1.1 The 2023 SCCAS Excavating Inhumations for Mineral Preserved Organics Guidance needs listing here and the OWSI should set out that these requirements will need to be followed in appropriate instances. Other relevant best practice guidance should also be referenced here.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.119	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.3.4 And also digital archiving provisions	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.120	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.3.6 Provision should also be made for hard copies to be submitted to the County HER.	Agreed. The Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be updated accordingly
7.121	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.4.1 All mitigation sites will require a PXA to be prepared, whether they warrant publication or not. Provision needs to be made for a PXA for each mitigation site (or group of mitigation areas should they be located in the same area/contain related remains). Following the submission and approval of all PXAs, a project wide UPD will need to be prepared which sets out the ongoing strategy for assessment, reporting and publication for the project. Provision should be made for full grey lit research archive reports for ALL sites, independent of publication given not every element of sites will necessarily be published. All reports will need review and approval by SCCAS. Sections 6.4 and 6.5 therefore need revising accordingly and greater detail regarding the approach to post-excavation assessment and reporting and the contents of documents needs including. SCCAS suggest reviewing the Sizewell OWSI as a guide to the expected contents of this section.	The Applicant agrees with these comments.

Reference	Matter	Point Raised	Applicant's Comments
7.122	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.5 Provision should also be made to prepare summaries for inclusion in the annual PSIAH fieldwork round-up and blog posts to be prepared for the Suffolk Heritage Explorer.	
7.123	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.6 Each separate fieldwork report/PXA etc will require a separate OSIS record.	
7.124	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.6.2 Copies of the relevant OASIS summary sheet must be included in all reports.	
7.125	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.7 Each PXA must include a quantification of the site archive for each area.	The Applicant agrees with these comments.
7.126	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.7.1 The SCCAS archive will be the required archive repository	
7.127	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	6.7.2 The SCCAS archive will be the required archive repository and so the 2024 SCCAS archive requirements should be referenced	
7.128	Document 7.5.4.1: Outline Onshore Overarching	6.7.4 Specify 'Trusted Digital Repository' as 'Archaeology Data Service' which is the industry wide repository for digital archaeological archives	

Reference	Matter	Point Raised	Applicant's Comments
	Written Scheme of Investigation (OWSI) – Suffolk [APP-343]		
7.129	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	7.1 As per above comments, the SCCAS preference is for a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk to be submitted, rather than piecemeal areas, supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. This is so that the ongoing archaeological requirements for the project as a whole can be clearly understood and so this document can also be provided to all project contractors.	
7.130	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	7.1.4 Also trenching results overlain on the geophysics greyscale, archiving provisions, details of site and specialist staff, fieldwork timelines, site security provisions, and digital data management plans.	
7.131	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	8.5 No works (either pre-commencement or construction) involving ground disturbance may commence within defined archaeological mitigation areas until they have been formally signed off by SCCAS.	
7.132	Document 7.5.4.1: Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]	Section 9: Provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding. This may stretch to long term management of assets, provision of outreach opportunities such as blogs, site visits, visits to schools, temporary displays/'pop-up' museums, newsletters and updates, talks, popular publication, displays to be hosted in areas relevant to the scheme, community involvement, and strategic linking of archaeology with any other landscape/tourism initiatives and public space works.	The Applicant notes this comment. Outreach will be discussed further with stakeholders including SCCAS and Historic England with an Archaeological Outreach Strategy plan/document agreed. This will be included in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] to be submitted prior to end of the examination.
7.132	References	<ul style="list-style-type: none"> - A 2025 version of the SCCAS standard guidance for excavation and continuous monitoring and recording are now available and so these updated versions should be used/referred to. - The SCCAS geophysical survey and trenching guidance 2025 should also be included. - The 2023 SCCAS Excavating Inhumations for Mineral Preserved Organics Guidance needs listing - The SCCAS archive guidance (2024) needs listing - The Regional research frameworks documents need referencing here. - HE guidance relating to Environmental Archaeology (2011) needs listing 	The Applicant notes this comment.. This will be addressed in the updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] which will be submitted prior to the end of the examination.

Reference	Matter	Point Raised	Applicant's Comments
		- A plan showing the status of evaluation works for the entire onshore area of scheme in Suffolk, clearly identifying which land parcels have had evaluation works completed and those where evaluation / assessment is still pending should be included in the OWSI.	
7.133	Document 6.3.2.3.D: ES Appendix 2.3.D Geophysical Survey Report [APP-112]	SCCAS have approved this report. Please can a hard copy be supplied to the County HER and the OASIS record be completed ready for sign off.	The Applicant will request this from the geophysical subcontractor and provide it to SCCAS.
7.134	Document 6.3.2.3.E: ES Appendix 2.3.E Aerial Photography and LiDAR Report [APP-113]	1.1.3 This report relates to Suffolk and not Kent	The Applicant notes this comment. This is a typo in paragraph 1.1.
7.135	Document 6.3.2.3.E: ES Appendix 2.3.E Aerial Photography and LiDAR Report [APP-113]	HER site codes and not MSF numbers should be used throughout the report	The Applicant notes this comment. This will be updated
7.136	Document 6.3.2.3.E: ES Appendix 2.3.E Aerial Photography and LiDAR Report [APP-113]	An OASIS record should be produced for this report and a copy of the summary sheet included as an appendix	Agreed.
7.137	Document 6.3.2.3.F: ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]	SCCAS have approved this report. Please can a hard copy be supplied to the County HER and the OASIS record be completed ready for sign off.	The Applicant will request this from the archaeological subcontractor and provide it to SCCAS.
7.138	Draft Development Consent Order (dDCO) [AS-087]	DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the OWSI to secure this; therefore, SCCAS advise the need for amendments in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery of the project and prevent potential delays to the sign off of archaeological requirements.	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.

Reference	Matter	Point Raised	Applicant's Comments
7.139	Draft Development Consent Order (dDCO) [AS-087]	<p>The clause relating to human remains also needs amending to prevent issues in appropriately dealing with archaeological human remains and potential delays to the project</p>	<p>The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.</p>
7.140	Draft Development Consent Order (dDCO) [AS-087]	<p>DCO Requirement 14 – SCCAS suggested wording:</p> <p>(1) The proposed development must be undertaken in accordance with the following documents as relevant to the location of the works unless otherwise agreed with the relevant planning authority:</p> <p>(a) Outline Onshore Overarching Written Scheme of Investigation – Suffolk for onshore works within the county of Suffolk.</p> <p>(b) Outline Onshore Overarching Written Scheme of Investigation – Kent for onshore works within the county of Kent; and</p> <p>(c) Outline Offshore Overarching Written Scheme of Investigation and the Marine Archaeological Method Statement as appropriate</p> <p>(2) No stage of the authorised development may commence until for that stage either a preservation in situ Historic Environment Management Plan or a site-specific written scheme of investigation (which accords with the relevant Overarching Written Scheme of Investigation and is informed by the pre-commencement archaeological surveys) has been submitted to and approved by the relevant planning authority.</p> <p>(3) Site-specific written schemes of investigation must be in accordance with the outline written scheme of investigation and must identify areas where archaeological works are required and the measures to be taken to protect, record or preserve any significant archaeological remains that may be found and must include:</p> <p>(a) an assessment of significance and research questions.</p> <p>(b) the programme of methodology of site investigation and reporting.</p> <p>(c) the programme for post-investigation assessment.</p> <p>(d) proposals for providing for the analysis of site investigation and recording.</p> <p>(e) proposals for providing archive deposition of the analysis and records of the site investigation.</p> <p>(f) nomination of a competent person or persons/organisation to undertake the works set out within the detailed written scheme of investigation; and</p> <p>(g) an implementation timetable.</p> <p>(4) All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, prior to the commencement of any pre-commencement or construction works in that stage.</p> <p>(5) Unless otherwise agreed with the relevant planning authority:</p> <p>(a) No later than two years following the completion of the fieldwork specified in each site-specific written scheme of investigation, a site-specific post excavation assessment for that site must be completed in accordance with the Overarching Archaeological Written Scheme of Investigation and submitted to Suffolk County Council for approval.</p> <p>(b) No later than one year following the approval of the final site-specific post excavation assessment, an archaeological updated project design for all sites, must be submitted to Suffolk County Council for approval. The archaeological updated project design must be produced in general accordance with the Overarching Archaeological Written Scheme of Investigation, include details of the scope of post-excavation analysis and publication and have regard to the site-</p>	<p>The Applicant will consider this drafting point for the next iteration of the Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>specific research agendas set out in the site-specific written schemes of investigation.</p> <p>(c) Post-excavation analysis and publication must be carried out in accordance with the approved archaeological updated project design.</p> <p>(d) The full archaeological archive must be submitted to the Suffolk County Council Archaeological Service (Archive) in accordance with the archaeological updated project design.</p>	
7.141	Draft Development Consent Order (dDCO) [AS-087]	DCO Part 4 Supplemental powers: Removal of human remains- SCCAS would advise that the current wording has implications with regards to dealing with archaeological human remains appropriately and also has the potential to cause delays to the project.	The Applicant notes this comment.
7.142	Draft Development Consent Order (dDCO) [AS-087]	There are no records of any historic human remains or burial sites anywhere within the Sea Link Order Limits. During archaeological evaluation work undertaken across the scheme so far, a number of human cremations, thought to be of prehistoric date, have been recorded. In addition, it is not uncommon for human remains to be uncovered during archaeological fieldwork and additional archaeological inhumations and cremations can be expected to be identified during ongoing archaeological evaluation and mitigation works. Given the age of these remains, it will not be possible for the individual or any living relative to be identified.	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
7.143	Draft Development Consent Order (dDCO) [AS-087]	The current wording of the DCO would place certain requirements on the developer with regards to human remains, however, for remains over 100 years old it is usually standard archaeological practice that the terms of the Burial Act 1857 are followed. The requirements of the DCO are therefore in conflict with best practice for dealing with human remains in archaeological contexts as the terms of this article would lead to probable burial features being exposed for an extended period and at a risk from damage or harm. In addition, the Overarching Archaeological WSI sets out the need for excavation of human remains to be undertaken in line with the requirements of the Burial Act, as well as archaeological best practice guidance.	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
7.144	Draft Development Consent Order (dDCO) [AS-087]	SCCAS would therefore advise the need for the addition of a clause with regards to appropriately dealing with archaeological human remains believed to be over 100 years old in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents.	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3

6. Applicant’s Comments on Chapter 8: Water Environment

6.1 Introduction

6.1.1 This section provides the Applicant’s comments on Chapter 8: Water Environment

6.2 Comments Table

Table 6.1 Applicant’s Comments on Chapter 8: Water Environment

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
8.17	Construction Phase Impacts - Negative	Surface water run-off has the potential to cause flooding during the construction phase, particularly around the substation due to Friston’s high sensitivity in terms of surface water flood risk.	This potential is acknowledged by the Applicant, and to avoid impacts on surface water flood risk the Project design embeds a range of Sustainable Drainage (SuDS) measures to capture and attenuate rainfall runoff.
8.20	Operational Phase Impacts - Neutral	On the assumption that field drainage is reinstated following construction, no impacts are identified because of the underground cables.	Agreed.
8.21	Operational Phase Impacts - Negative	Given the sensitivity of Friston in terms of surface water flood risk, there is the potential for surface water flooding in the Friston area because of the substation’s operation.	Operation of the proposed substation would not increase surface water flood risk to downstream areas, including Friston.
8.22	Operational Phase Impacts - Negative	Currently the proposals from Sea Link, regarding surface water drainage, do not align with the already consented Scottish Power renewable proposals.	SPR and the Applicant are liaising extensively on the design, layout and drainage of the Friston site. The emerging detailed drainage being developed by SPR, with input from the Applicant, is not yet in the public domain so we are not yet able to reflect this in our DCO plans. However, the Applicant is not intending to take a different approach to drainage of the site to that proposed by SPR.
8.25	Decommissioning Phase Impacts - Negative	Surface water runoff has the potential to cause flooding during the decommissioning phase if not managed.	Decommissioning of the Project would be undertaken in accordance with good practice at the time of decommissioning, inclusive of measures to manage surface water runoff.
Required Mitigation			
8.26	Infiltration potential	National mapping for the converter station site area suggests soils have good properties for infiltration. Therefore, the Council, as Lead Local Flood Authority (“LLFA”), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network.	SPR and the Applicant are liaising extensively on the design, layout and drainage of the Friston site. The Applicant is not intending to take a different approach to drainage of the site to that proposed by SPR.
8.27	SPR infiltration data	The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, if the substation is not delivered under SPR’s existing consent.	SPR and the Applicant are liaising extensively on the design, layout and drainage of the Friston substation site. The Applicant is not intending to take a different approach to drainage of the site to that proposed by SPR.

Reference	Matter	Point Raised	Applicant's Comments
8.28	Haul road drainage design	The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction. However, the Council considers that the return period to which the haul road drainage will be designed is unclear, as is the methodology that has been used for the indicative sizing of drainage features on the plans. It is essential that there is sufficient space within the Order Limits to accommodate such drainage provision, particularly the haul road.	A response to this comment is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.29	Avoiding pluvial flood risk	Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Friston Flood Study report May 2020.	A response to this comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.30	Managing intercepted flows	Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring there is adequate space available for any necessary mitigation within the Order Limits.	A response to this comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.31	Friston sensitivity	Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and therefore must be adequately assessed. The current Flood Risk Assessment does not sufficiently demonstrate this.	A response to this comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.32	Substation flood risk concerns	The Council is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of SPR's EA1N/2 project. Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR's DCO consent due to the lack of assessment methodology or calculation included within the assessment.	SPR and the Applicant are liaising extensively on the design, layout and drainage of the Friston substation site. The Sea Link Order Limits are wide at the Friston site and contain significant areas that could be utilised for drainage and mitigation. Drainage works were not previously included as an individual 'work' in the original application so were not shown on the Works Plans. In part to clarify the areas for works at Friston, the Works Plans have been updated (see Application Document 2.5.1 B (version 2) Works Plans – Suffolk [CR1-007] and drainage is now presented as Work No. 13. This update should provide reassurance over the extensive area available for the implementation of drainage at the site. This provides ample space for drainage of Friston Substation and all associated works should these works be constructed under the Sea Link application.
8.33	Historic flooding evidence	SCC is not content with the Applicant's assessment of flood risk in Friston. The Environmental Statement ("ES") fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.	A response to these comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.34	BMT 2020 flood study	The County Council LLFA have also produced BMT Friston Flood Study report May 2020 for the Friston catchment, which is available to the Applicant should they not already have it, to enable them to assess existing surface water flood risk in the area.	
8.35	Missing watercourses	The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, particularly the watercourse serving the Saxmundham converter station. This should form a walkover survey for	

Reference	Matter	Point Raised	Applicant's Comments
		the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to a viable discharge point.	
8.36	Substation over watercourse	The proposed substation is located directly over an ordinary watercourse. A surface water flow path adjacent to this watercourse has been identified as part of the BMT Friston Flood Study report May 2020, which would directly impact the chosen site location. The natural infiltration basin on site has also not been considered; this forms a critical component of the surface water regime.	
8.37	Drainage sizing clarity	The methodology, calculation, and areas used for the initial sizing of drainage features, both permanent and temporary are unclear at this time. The LLFA would expect accompanying plans and calculations to demonstrate how realistic the sizing of these features are, given the compact nature of the Order Limits. This also extends to impermeable areas and losses through permeable surfaces.	Further information regarding the methodology for sizing drainage features (permanent and temporary), with supporting calculations will be provided by the Applicant.
8.38	Inconsistent drainage strategy	There is an inconsistency with the proposed Friston substation drainage strategy. The Flood Risk Assessment and plans do not provide clarity on the proposed system. Plans and some text suggest a single infiltration basin with overflow; other text suggests an overflow to an additional attenuation basin (2 basins).	Detailed design of drainage cannot be progressed in advance of detailed design of the infrastructure and consequently this detail of the construction and operational drainage will be provided in Drainage Management Plans submitted and approved under requirement 6. The context at Friston is made more complex by the fact that the SPR projects propose significantly more development (and a greater impermeable area) at the site than would be provided by Sea Link under Scenario 1 or 2. These projects are also progressing in advance of Sea Link, with detailed drainage plans for the site being developed by SPR, with input from the Applicant. The Applicant has been strongly encouraged by all parties to develop coordinated drainage plans with SPR and is working hard to do so, but this does mean that it has not yet been possible to present the drainage plans. The Applicant is not intending to develop a different strategy to drainage at the Friston site to that being progressed by SPR, with input from the Applicant.
Comments on application documents			
8.40	Plans and Drawings	Proposed Order Limits do not extend to the Friston main river up to Highway culvert, as was also the case for the SPR DCO. The County Council LLFA has encountered problems with the SPR projects due to work required outside of the DCO process, including work to facilitate site outfall(s). The Council therefore suggests that an extension of the Order Limits to the culvert at Grove Road may help to prevent similar issues if Sea Link is granted development consent.	A response to this comment is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.41	Document 2.11: Water Bodies in the River Basin Plans [APP-035]	SCC considers that Friston main river is not noted in this document and considers it possibly should be. It is not a designated 'main river' as recorded by the EA on the national 'main river map' (for England) under section 193 of the Water Resources Act 1991 but it is managed by the Environment Agency ("EA") as if it were a 'main river'	Application Document 2.11 Water Bodies in the River Basin Management Plans (Version 2, change request) [CR1-022] is intended to illustrate water bodies that are designated and monitored under the Water Framework Directive. The Friston river is not such a water body and therefore is not included in the plan.
8.42	Document 2.13: Design and Layout Plans [APP-037]	The drainage features for drawing DCO/S/DE/SS/1202 / DCO/S/DE/SS/1204 / DCO/S/DE/SS/1209 should ideally be scaled for the typical section to the requested return period of 1% AEP – there is not much space given on the typical cross section to facilitate drainage features and thus does not demonstrate a suitable level of assessment to determine realistic sizing. Construction water management will be a critical aspect of the delivery of the scheme.	The typical construction swathes are not location specific which would be required to size the drainage channels for any given return period. The overall construction swathes have been produced with sufficient flexibility to accommodate increased drainage attenuation capacity. Noting that attenuation is primarily provided by attenuation and infiltration ponds provided along the construction corridor as

Reference	Matter	Point Raised	Applicant's Comments
			indicated on the Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038] .
8.43	Document 2.14.1: Indicative General Arrangement Plans [APP-038]	SCC would appreciate an explanation from the Applicant regarding what the initial sizing of permanent and temporary attenuation features is based on. SCC considers that they appear quite small and do not have outfall locations noted.	Further information regarding the methodology for sizing drainage features (permanent and temporary), with supporting calculations will be provided by the Applicant. Outfall locations are provided on the Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk [APP-038] , refer to key for 'Proposed drainage – temporary outfall' and 'Proposed drainage – permanent outfall'.
8.44	Document 2.14.1: Indicative General Arrangement Plans [APP-038]	SCC considers it would be very useful to have general arrangement plans exclusively for drainage that shows the outfall points overall and any watercourses where they outfall ultimately, not just the point of discharge from the initial system.	
8.45	Document 2.14.1: Indicative General Arrangement Plans [APP-038]	It would be useful to overlay predicted surface water flood risk to the cable route and substation / converter plans. This is particularly useful in the determination of the suitability of drainage feature locations.	These plans are provided within Application Document 6.9 Flood Risk Assessment [APP-292] . Figure 2A and 2B in Appendix A overlay surface water flood zones and the projects construction and operational infrastructure, including proposed drainage features.
8.46	Document 2.14.1: Indicative General Arrangement Plans [APP-038]	There are no plans showing indicative strategic drainage features or general drainage design. This seems an odd omission from the plans	Attenuation is primarily provided by attenuation and infiltration basins provided along the construction corridor as indicated on the Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038] . However, as discussed above, these are highly indicative, particularly at Friston, where significantly different plans are being agreed between SPR and the Applicant.
8.47	Document 3.1: Draft Development Consent Order [AS-087]	SCC notes that Work No.2 and Work No.5, described in Schedule 1 Part 1 (Authorised Development), have no mention of drainage works.	Work No.2 and Work No.5 authorise underground electricity connection works. No operational drainage is required for these works given their nature. Drainage works are however included in Schedule 1 article 2 of Application Document 3.1 Draft Development Consent Order [CR1-017] .as associated development in connection with the construction or maintenance of the Works described in Schedule 1 article 1. Further, a new work has now been incorporated into the Works Plans for drainage, work 13. This new work provides more clarity over the areas where drainage could be developed.
8.48	Document 3.1: Draft Development Consent Order [AS-087]	In relation to Requirement 6, from SCC's experience with ScottishPower Renewables on EA1/2, the Flood Management Plan could be incorporated into the Construction Drainage Management Plan as a suitable appendix.	The Applicant notes this comment, which will be considered in the next iteration of the draft Development Consent Order.
8.49	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph 3.2.23 should also list the more detailed Suffolk LLFA drainage hierarchy that is found in SCC LLFA Appendix A (2023).	The Suffolk LLFA guidance is referred to and has informed preparation of the approach to drainage on the project.
8.50	Document 6.8: Flood Risk Assessment [APP-292]	EA flood risk data is not noted in Table 4.1.	Table 4.1 summarises the data sources reviewed to identify historic flood events within the study area. Whilst the EA data source is not tabulated, it has been reviewed, as detailed in paragraph 4.3.2 of the report.
8.51	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph 4.4.2 – has this statement considered runoff from within the Order Limits to the receptors which are outside of the Order Limits?	This paragraph refers to historic surface water flooding incidents in the vicinity of the Suffolk Onshore Scheme. The assessment of the potential for runoff from land within the Order Limits to impact on receptors outside the Order Limits is presented in subsequent paragraphs of Section 4.

Reference	Matter	Point Raised	Applicant's Comments
8.52	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.2 – could be reworded to say, ‘where infiltration is not feasible.’ Should further testing show infiltration to be fully or partially viable, this should take precedent.	The Applicant notes this comment.
8.53	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.7 – Assume that the climate change volume is proposed to be discharged via the Friston main river. This is an improvement on the SPR proposal, but SCC sees no reason not to provide full infiltration on site should it be feasible. Recent infiltration testing shows the ground to be viable to do so and there would appear to be space on site to do so. Given the high level of complication, SCC has had to deal with the outfall into the Friston main river. SCC would strongly recommend, if it is technically possible, attenuating and infiltrating all of the water onsite. This far reduces future complication in assessment of the impacts on the Friston main river, which is at a high risk of flooding from surface water.	The Applicant agrees that if it is technically possible, the drainage system will infiltrate all runoff from the impermeable areas of the proposed substation. The Applicant is working with SPR to review the recent infiltration testing to confirm the technical feasibility of this option.
8.54	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.8 conflicts with the prior points and plans.	The Applicant notes the comment, however the construction compound formation will be determined at detailed design based on the needs of the project.
8.55	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.9 should refer to Q-bar or Q-med, whatever is lower.	
8.56	Document 6.8: Flood Risk Assessment [APP-292]	Details of the proposed Saxmundham scheme and its discharge point(s) would be useful in this section.	
8.57	Document 6.8: Flood Risk Assessment [APP-292]	The Temporary Works Drainage Strategy on page C.2 – Construction compounds should all be constructed from type 3 aggregate with either a bare surface or permeable asphalt.	
8.58	Document 6.8: Flood Risk Assessment [APP-292]	There is a lack of design return periods mentioned in this section which is a critical design consideration.	
8.59	Document 6.8: Flood Risk Assessment [APP-292]	All basins should be considered as impermeable area in any calculations to account for a ‘full basin’ scenario.	Noted
8.60	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.28 – SCC questions why 50% of the area is considered permeable. The runoff will all ultimately end up in the basins and thus should be considered as impermeable drained area even if constructed of permeable materials. For example, surface soils at both Friston and Saxmundham are not of high permeability and thus both pieces of infrastructure are likely to drain into a network of permeable pipes and discharge into their respective basins. SCC is unsure of the methodology that has led to a 50% factor.	50% of the Converter and Substation footprints have been considered as impermeable as they will be formed of buildings and roads, the granular and chippings surface of the rest of the site is considered permeable. Runoff from these permeable areas will match or improve on existing green field runoff rates due to the attenuation of the runoff within the compound buildup.

Reference	Matter	Point Raised	Applicant's Comments
8.61	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.29 – This is a safe assumption, assuming that subsoils in the 300-500mm range are permeable, but SCC would assume that drainage for the subbase will need to be collected.	Noted
8.62	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.32 should ensure distinction between the sites. Saxmundham and Friston do not have the same strategy, and some areas of the text imply they are the same due to no distinction.	Refer to Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk [APP-038] which shows the alternative methodologies proposed at the Saxmundham and Friston locations. However, it should be noted that the proposed approach at Friston shows is highly indicative because in reality the strategy will be strongly influenced by the drainage approach developed by SPR for the EA1N and EA2 projects at the same site.
8.63	Document 6.8: Flood Risk Assessment [APP-292]	Paragraph C.1.33 – proposed pond depth up to 1m are not required to have a freeboard of 300mm but rather 30% of the design maximum water level. This will be a new standard in the updated LLFA guidance due during the construction of the site. For example, a freeboard of 300mm on a 500mm deep feature is 60%, this does not promote design flexibility.	Noted.
8.64	Document 6.8: Flood Risk Assessment [APP-292]	There is a lack of assessment or inclusion of the BMT report when assessing flood risk in the Friston catchment.	A response to this comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.65	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Paragraph 4.2.34 – as per C.1.28 above. The gravel bases for equipment could be considered to function similarly to the subbase of permeable paving, which when set above impermeable soils is seen as either type b or c and has a connection to the wider attenuation network but will only be considered free draining if the subsoils are suitably permeable.	Noted, runoff from impermeable ground currently occurs at these sites and will continue to occur post construction.
8.66	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Paragraph 4.2.37 – as above.	Noted
8.67	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Enabling works – bunding / silt fencing / management of anticipated flow routes should be set out at the earliest opportunities to ensure no adverse run off from the site during the enabling works. This also applies for 'temporary construction compounds' and should be considered at the earliest stages of any enabling works.	Noted.
8.68	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed	Paragraph 4.6.31 – good but should be mentioned in other relevant documents.	The Applicant requests clarity on what other documents this should be included in and for what purpose.

Reference	Matter	Point Raised	Applicant's Comments
	Project [AS-093]		
8.69	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Haul roads – No mention of what return period the haul road drainage will be designed to. 1 in 100 should be the default return period but could be lowered if there is evidence that flood risk is minimal in the event of overtopping.	A response to this comment is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
8.70	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Temporary Culverts – should be designed so that any overtopping is routed such that it re-enters the watercourse downstream of the culvert. In areas of medium/high flood risk the culverts impact on the watercourse should be hydraulically modelled.	There are several design commitments linked to temporary culverts, secured through inclusion within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (REP1-102) .
8.71	Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]	Paragraph 4.6.89-90 – drainage at the various stages is necessary, it is not one singular stage.	These paragraphs describe the fitting of electrical equipment necessary to operate and administer the converter station and are not related to drainage.
8.72	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	SCC would like to know whether Sea Link has been in consultation with SPR on physical testing such as the SPR infiltration undertaken last year to share data. The LLFA is keen that should, in the worst instance, SPR not be able to deliver the Friston substation, good sharing of testing data ensures that repetition is not necessary. This document is good as an initial document but given the availability of real-world testing data for a large part of the proposal, SCC considers this should be integrated if possible.	The Applicant is working closely with SPR and can confirm that both parties have shared information for assessment. The Applicant is looking to align its drainage strategy with the developing SPR design as more details become available. In the unlikely scenario where SPR do not deliver the Friston substation, the Applicant will look to develop the drainage in line with SPRs emerging strategy.
8.73	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	Paragraph 2.6.1.1 – the site is discharging into an adjacent watercourse, and SCC considers that this merits comment.	The comment within the report refers to the presence of water courses within the construction area of the Converter, the discharge of the drainage is a considerable distance to the south of the converter site.
8.74	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	Paragraph 2.6.1.2 – there are multiple minor watercourses along the cable corridor to Friston and possibly from Friston to Saxmundham. These are noted in the SPR watercourse crossing documents.	Please refer to Application Document 6.3.1.4.A ES Appendix 1.4.A Crossings Schedules [APP-089] for details on water course crossings.
8.75	Document 6.3.2.5.D: ES Appendix 2.5D Ground	Paragraph 2.7.2 – SCC questions why 1 in 30 is the only return period mentioned in relation to surface water flooding. SCC is unsure as to why the surface water section is so light on detail compared to the above fluvial flood risk. Both should be explored with a similar level of detail.	Please refer to Application Document 6.8 Flood Risk Assessment [APP-292] for full detail on the flooding assessment including surface water.

Reference	Matter	Point Raised	Applicant's Comments
	Investigation Report – Suffolk [APP-119]		
8.76	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	Figure 2.2 is blurry and difficult to read.	Noted
8.77	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	Infiltration testing at the converter station seems to show it might be possible. SCC suspects this is due to ground water level 8.6.2 suggests some infiltration may be possible. It would be useful to have a plan that shows zones where infiltration is possible based on the testing concluded to date.	Section 8.6.2 states that potentially suitable medium for infiltration drainage was identified at the location of the infiltration pond proposed for the Suffolk Substation.
8.78	Document 6.3.2.5.D: ES Appendix 2.5D Ground Investigation Report – Suffolk [APP-119]	The Appendix A documentation does not have any drainage information as stated in the text.	Please refer to the Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038] which were separated from the report.
8.79	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Study Area and Water Environment Receptors – Figure 6.4.2.4.1	There are several minor ordinary watercourses within the Order Limits areas that have not been included – these can be found in the SPR documentation for the cable route and Friston substation area. It also appears that some of the watercourses identified for temporary discharge and the watercourse for the permanent attenuation features at Saxmundham have not been included on the plan.	A response to this comment is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
8.80	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	This plan should show the relevant return periods, take into account work such as the BMT report on flood risk in the Friston catchment, and use the latest NaFRA2 data. It would appear that this plan is not using the future 2040-2060 epoch and thus is not representing flood risk over the life of the development. It is very important that all surface water flood risk figures throughout the entire ES are consistent in what data they are showing.	Excerpts of the flood mapping produced by the BMT study are provided within Application Document 6.9 Flood Risk Assessment [APP-292] , which also present surface water mapping based on NaFRA2 for the construction and operational stages of the Project.
8.81	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	Permanent infiltration pond is shown but not the attenuation basin Ideally indicative construction compound work should not impact the SuDS. LLFA requests a 1 in 100 return period capability during construction. The plan is not labelled as a figure (4.4.11). SCC requests that the Applicant clarifies on the plan which epoch has been used to avoid confusion at a later date.	Further clarification on this comment is required in order to provide a response. Figure 6.4.2.4.3 does not illustrate any of the proposed drainage features..

Reference	Matter	Point Raised	Applicant's Comments
8.82	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	Paragraph 4.4.14 – amend text to say Lead Local Flood Authorities at the time of discharge. To ensure surface water development regime is kept up to date with evolving standards.	Further clarification on this comment is required in order to provide a response. There is no paragraph 4.4.14 in Application Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment or its accompanying figures.
8.83	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	SCC would appreciate clarification regarding whether the Appendix 1 plans concerning Friston substation assume it is being built out by SeaLink, given that there is only a proposed infiltration pond.	This figure does not illustrate any of the proposed drainage features. It was provided to give an indication of the location of land within and in proximity to the Order Limits at high and medium risk of surface water flooding.
8.84	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	Appendix 1 plans for the converter station show no drainage infrastructure.	These plans were not intended to show proposed drainage infrastructure. These features are mapped in Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk [APP-038] .
8.85	Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	The Appendix 1 surface water flood risk plans should be more detailed. Showing the return periods in the legend and noting if it is the construction (up to 2040 epoch) or the permanent (2040-2060 epoch) and what dataset has been used (i.e. NaFRA2). An example of this is the 'OPERATION SURFACE WATER FLOOD RISK (SUFFOLK ONSHORE SCHEME)' (pg.75) that does not appear to use the 2040-60 epoch when assessing the long-term flood risk.	More detailed plans are provided in Application Document 6.9 Flood Risk Assessment [APP-292] , which present surface water mapping based on NaFRA2 for the construction and operational stages of the Project.
8.86	Document 6.3.1.4.A: ES Part 1 Introduction Chapter 4 – Appendix 1.4.A Crossing Schedules [APP-089]	SCC considers it would be useful to have annotated plans showing the locations.	The locations of the proposed watercourse crossings are illustrated in Figure 2A and 2B in Appendix A of Application Document 6.9 Flood Risk Assessment [APP-292] .
8.87	Document 7.5.3.1: Construction Environmental	GG15 – Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. There will be no intentional discharge of site runoff to ditches,	This is the wording of commitment GG15.

Reference	Matter	Point Raised	Applicant's Comments
	Management Plan Appendix A Outline Code of Construction Practice [APP-341]	watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of an emergency).	
8.88	Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	GG05 – Correct storage of materials and soils to minimise flood risk is an important topic that should be named.	Noted. As stated in this commitment, the bullet point list of topics is not exhaustive. Correct storage of materials and soils is good practice and commitments to these good practices are secured via measures AS01 and GH05 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] .
8.89	Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	GG06 – This should include any watercourses that are part of the construction regime, they are an indirect receptor for poor construction management practices.	Noted. The current wording of commitment GG06 secures the inclusion of watercourses where they flow through works areas.
8.90	Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	GG19 – And should not be situated in areas of flood risk or surface water flow paths.	The placement of earthworks and stockpiled soil to avoid areas of flood risk is secured by commitment W06 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] .
8.91	Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	GG26 – Type of fencing should take into account surface water flow paths.	The Applicant is considering an amendment to commitment GG26, which will be confirmed at Deadline 3.
8.92	Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	W02 – No topsoil should be stored in surface water flow paths, both mapped and noted on site. Modelling of watercourse culverts to determine flood risk implications for watercourses with a medium/high surface water flood risk. Designed as such that any overtopping is directed back into the watercourse downstream.	The placement of stockpiled soil to avoid areas of flood risk/surface water flow paths is secured by commitment W06 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] . Culvert design parameters are secured via commitment W04.

7. Applicant’s Comments on Chapter 9: Geology and Hydrology

7.1 Introduction

7.1.1 This section provides the Applicant’s comments on Chapter 9: Geology and Hydrology

7.2 Comments Table

Table 7.1 Applicant’s Comments on Chapter 9: Geology and Hydrology

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
9.15	Construction Phase Impacts - Positive	There is potential for the proposed development to stimulate the local economy through the utilisation of locally sourced construction materials, namely sand and gravel, from existing facilities and the requirement for recycling or disposal of waste items.	The Applicant notes this comment.
9.17	Construction Phase Impacts - Negative	Extraction of sand and gravel resources within parts of the area occupied by the underground cables would not be possible.	Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment [APP-118] provides a qualitative assessment of the potential effects on Mineral Safeguarded Areas and Mineral Consultation Areas for the Suffolk onshore scheme
9.19	Operational Phase Impacts - Neutral	No conflicts with existing minerals and waste facilities.	The Applicant notes this comment.
9.20	Operational Phase Impacts - Negative	Extraction of sand and gravel resources within parts of the area occupied by the underground cables would not be possible over the operational lifetime of the development. Appended Maps show the extent of underlying sand and gravel resources.	Application Document 6.3.2.5.C Appendix 2.5.C Preliminary Minerals Resource Assessment [APP-118] provides a qualitative assessment of the potential effects on Mineral Safeguarded Areas and Mineral Consultation Areas for the Suffolk Onshore Scheme
9.21	Decommissioning Phase Impacts – Positive	There would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.	The Applicant notes this comment.
9.22	Decommissioning Phase Impacts – Neutral	In terms of the underlying sand and gravel resources the majority of the proposed development is not irreversible and removal of the development following cessation of use should be required to restore access to mineral resources.	The Applicant notes this comment.
Required Mitigation			
9.24	Minerals & waste role	SCC as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.	The Applicant notes this comment.
9.25	Waste hierarchy	Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and e) disposal.	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
9.26	Safeguarding / no conflicts	Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities. In general, there would potentially be a positive impact upon minerals and waste facilities arising from the demand for sand and gravel and waste disposal.	The Applicant notes this comment.
9.27	Sterilisation of minerals	In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals.	The Applicant notes this comment.
9.28	Reuse excavated minerals	Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development where possible.	As identified in commitment GG22 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043] , a Material and Waste Management Plan will be submitted to and approved by the local planning authority prior to construction as secured by Requirement 6 in the draft DCO. The commitment specifies that the plan will set out, in an auditable manner, how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy. This will include minerals excavated on site.
9.29	Restoration post-cessation	Removal of the development following cessation of use should be required to restore access to mineral resources.	The Applicant notes these comments.
9.30	Removal within 12 months	All structures including buildings, foundations, plants, and machinery should be removed within 12 months following the cessation of electrical transmission.	Given the nature of the Proposed Project, it is anticipated that the assets will be maintained and elements replaced as necessary to extend the assets life span beyond the initial design life of the project. Decommissioning plans will therefore be developed in line with best practice at the time of any future decommissioning.

8. Applicant’s Comments on Chapter 10: Agriculture and Soils

8.1 Introduction

8.1.1 This section provides the Applicant’s comments on Chapter 10: Agriculture and Soils

8.2 Comments Table

Table 8.1 Applicant’s Comments on Chapter 10: Agriculture and Soils

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
10.11	Construction Phase Impacts – Negative Impacts	There would be a reduction in BMV agricultural land available and field drainage would be disrupted	The Applicant’s response to these points is provided in Table 2.18 of Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043] .
10.13	Operation Phase Impacts - Neutral	Assuming field drainage is reinstated following construction, this would not be disrupted during the operational phase	
10.14	Operation Phase Impacts – Negative	There would be a reduction in BMV agricultural land available	
10.17	Decommissioning Phase Impacts - Negative	There would be a reduction in BMV agricultural land available and field drainage would be disrupted	
10.18 – 10.22	Required Mitigation	Areas of best and most versatile (“BMV”) agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning. Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning. The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and mitigation would be required to restore drainage following construction and decommissioning. A map showing the general distribution of agricultural land classification is appended in Appendix 13. BMV agricultural land would require reinstatement and remediation to the same standard following construction and decommissioning in areas of underground cabling and following decommissioning in areas with surface infrastructure. Field drainage systems should be replaced as required after construction and decommissioning.	

9. Applicant’s Comments on Chapter 11: Traffic and Transport (including Public Rights of Way)

9.1 Introduction

9.1.1 This section provides the Applicant’s comments on Chapter 11: Traffic and Transport (including Public Rights of Way).

9.2 Comments Table

Table 9.1 Applicant’s Comments on Chapter 11: Traffic and Transport (including Public Rights of Way)

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
11.75 – 11.80	Local Highway Context – General Description of Network	<p>11.75The A12 is part of the LHA maintained Major Road Network (MRN) and links the A14 at Seven Hills Interchange east of Ipswich to the A47 in Lowestoft. It is a mix of dual carriageways south of Wickham Market designed and built around forty years ago with sections of evolved single carriageway sections unchanged other than through local improvements. It mostly avoids passing through settlements other than the western fringes of Woodbridge, Yoxford and Wrentham and Lowestoft but does pass through smaller villages such as Marlesford, Little Glemham, Stratford ST Andrew, Farnham and Blythburgh.</p> <p>11.76 The A1094 is the main route from the A12 towards Aldeburgh which is a popular tourist destination and as such the road is heavily trafficked throughout the year. This road is also narrow and winding between the A12 junction and Snape crossroads, where it then opens in a straighter, wider road with the exception of the junction with the B1121 which is on a sharp bend.</p> <p>11.77 The road network to the east of the A12 is primarily made up of B, C and unclassified small local roads which are narrow and/or winding in nature. With the exception of some elements of the B1122 between Yoxford and Leiston there has been little improvement to the network. Due to the local environment, they are heavily used by agricultural vehicles, and also recreationally by walkers and cyclists. There are several B class roads linking the local settlements</p> <p>11.78 The B class roads link many of the local settlements such as Saxmundham, Leiston and Aldeburgh to the A12 and each other.</p> <p>11.79 During the examination for EA1N and EA2, SCC and the applicant agreed that neither the B1121 nor the B1119 were suitable routes for construction traffic. That applicant committed to restricting its HGV movements to avoid use of the B1119 and B112141. The ExA for those projects noted that the local road network is</p>	<p>Noted. The Applicant has previously responded on comments relating to the B1119 and B1121 within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>generally unsuitable for the number and type of construction traffic but was satisfied with the applicant's approach to minimise impacts.</p> <p>11.80 During and holistic assessment of the construction traffic impacts of projects adjacent to SZC the emergency evacuation routes must be a consideration, for example the B1119 between Leiston and Saxmundham is currently the favoured emergency access route to and from Sizewell B.</p>	
11.87-11.88	Construction Phase Impacts – Negative – <i>Network Resilience</i>	<p>The Councils have raised concerns regarding the resilience of the highway network. The proposals rely on the A12 as the sole HGV route, and most will also use the A14 to access.</p> <p>The main issues are:</p> <ul style="list-style-type: none"> i. Closure of the A14 Orwell Bridge due to collisions or high winds resulting in traffic being diverted through Ipswich, ii. Closure of the A14 or the A12 (north and south of the A14) and lack of suitable diversions iii. Capacity of junctions on the strategic and major road networks, particularly if delivery of multiple NSIPs coincide, iv. Restrictions placed on the ability to maintain the highway network during normal working hours due to the higher volume of construction movements, v. Lack of laybys or other suitable parking, rest, or stopover facilities east of the A12. Except for the A12 north of Seven Hills to Woodbridge and the Wickham Marlet Bypass the local highway network has few laybys suitable for use by HGVs. There is only a single layby (at Eastbridge) on the combined A1094, B1122, and B1069 routes. The existing laybys on the A12 are under considerable stress with the increase HGV movements associated with the SZC and SPR projects. The concerns raised at previous examinations have been experienced with complaints from local residents about antisocial use of laybys and from hauliers regarding lack of areas to take legal breaks. 	<p>It is agreed that HGVs will access the Order Limits via the A12 and many will use the A14. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are set out in the Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]. Responses relating to the SRN have also previously been provided by the Applicant within their response to National Highways RR (Application Document 9.34.2 Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]). The Applicant has also planned to have a further thematic meeting with National Highways prior to Deadline 3, to review matters relating to the SRN including the A12/ A14 Seven Hills interchange.</p> <p>Construction traffic to be generated by the Proposed Project and its routeing has been assessed and is not expected to result in any significant effects on the surrounding highway, following the measures identified within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008] A detailed CTMP will be developed and approved by SCC post consent under requirement 6 of the draft DCO.</p>
11.89-11.90	Construction Phase Impacts – Negative – <i>Network Resilience</i>	<p>The intended DCO powers in article 13 may inhibit the authority in performing its duties as the local highway authority by removing control on the highway within the 'works' or associated with implementation of the traffic regulations in article 50.</p> <p>The presence of construction traffic on the network for 7 days a week will hamper routine highway maintenance or increase delays and disruption. The authority may also incur increase costs if forced for operational or safety reasons to undertake more work outside normal working hours.</p>	<p>The Applicant considers that the provisions are appropriate in the context of this Project. Provisions such as article 13 and article 15 are well precededented and have been deemed acceptable by the Secretary of State on previous Applicant DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p> <p>The Applicant has previously responded on comments relating to the proposed working hours within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p>
11.91	Construction Phase Impacts – Negative – <i>Road Users</i>	<p>Key issues facing road users include:</p> <ul style="list-style-type: none"> i. Delay to public transport and other road users including emergency services and public services. 	<p>Noted. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant effects on the surrounding highway and its road users,</p>

Reference	Matter	Point Raised	Applicant’s Comments																																														
		<div><div>ii.</div><div>Safety, fear, intimidation and severance as constriction traffic impacts pedestrians and cyclists where provision of sustainable transport infrastructure or alternatives and limited.</div></div> <div><div>iii.</div><div>Loss of amenity both on rights of way but also highways used to link or access these</div></div> <div><div>iv.</div><div>Lack of breaks in construction with seven days a week working</div></div>	<p>following the measures identified within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008].</p> <p>The proposed management and mitigation relating to Public Rights of Way is set out within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] which has been submitted in outline form to specify the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding PRow network. A detailed PRow Management Plan will be developed in accordance with the outline plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO.</p>																																														
11.92	Construction Phase Impacts – Negative – <i>Route Selection</i>	SCC is concerned that the Applicant has not undertaken sufficient assessment of potential access routes to the substation and convertor station. Whilst the proposed Fromus Bridge provides access to the Sea Link Convertor Station, access to the substation is via a temporary haul road during the construction phase and from the permanent access off the B1121 north of Friston during the operational phase. HGV and AIL access to the latter is through the alignment of the A1094/B1121 junction only possible via Leiston and Knodishall.	The Applicant can confirm that the accesses identified by SCC are correct and that these accesses have been suitably assessed in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] .																																														
11.93	Construction Phase Impacts – Negative – <i>Road Safety</i>	<div>11.93 Data taken from CrashMap (https://www.crashmap.co.uk/Search) 2020 to 2024 inclusive, and the Traffic and Transport chapter of the Environmental Statement [APP-054]</div> <div>Number of collisions resulting in injuries</div> <table><tr><th>Ref</th><th>Site</th><th>Fatal</th><th>Serious</th><th>Sligh t</th><th>SCC comments</th></tr><tr><td>S-RJ1</td><td>A12/A1094 Junction, Benhall</td><td>0</td><td>3</td><td>5</td><td>Discounted as being reconstructed by SZC</td></tr><tr><td>S-RJ2</td><td>A12/B1121 (South) Junction, Benhall</td><td>0</td><td>1</td><td>0</td><td></td></tr><tr><td rowspan="2">S-RJ3</td><td>A12/B1119 Junction Saxmundham (N)</td><td>0</td><td>2</td><td>2</td><td rowspan="2">Minor SZC works</td></tr><tr><td>A12/B1119 Junction Saxmundham (S)</td><td>0</td><td>1</td><td>2</td></tr><tr><td></td><td>A12 / Carlton Road, Kelsale cum Carlton</td><td>0</td><td>2</td><td>0</td><td>Not assessed by Applicant</td></tr><tr><td>S-RJ4</td><td>A12/B1121 (North) Junction, Kelsale cum Carlton</td><td>0</td><td>0</td><td>0</td><td></td></tr><tr><td></td><td>A12/A1120 Junction, Yoxford</td><td>0</td><td>0</td><td>1</td><td></td></tr></table>	Ref	Site	Fatal	Serious	Sligh t	SCC comments	S-RJ1	A12/A1094 Junction, Benhall	0	3	5	Discounted as being reconstructed by SZC	S-RJ2	A12/B1121 (South) Junction, Benhall	0	1	0		S-RJ3	A12/B1119 Junction Saxmundham (N)	0	2	2	Minor SZC works	A12/B1119 Junction Saxmundham (S)	0	1	2		A12 / Carlton Road, Kelsale cum Carlton	0	2	0	Not assessed by Applicant	S-RJ4	A12/B1121 (North) Junction, Kelsale cum Carlton	0	0	0			A12/A1120 Junction, Yoxford	0	0	1		<p>An assessment of Road Safety has been carried out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] for 14 junctions (as well as 13 highway links) within the study area. The sensitivity of receptors for Road Safety was based on Personal Injury Accident data obtained from SCC for the most recent five-year period (at the time of the assessment), which includes all user types including vulnerable users. The Applicant highlights that the collision record presented by SCC is representative of that presented within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. The assessment of Road Safety was also based on the worst-case scenario; the single busiest day of the construction programme in terms of construction traffic levels and no significant effects were identified.</p>
Ref	Site	Fatal	Serious	Sligh t	SCC comments																																												
S-RJ1	A12/A1094 Junction, Benhall	0	3	5	Discounted as being reconstructed by SZC																																												
S-RJ2	A12/B1121 (South) Junction, Benhall	0	1	0																																													
S-RJ3	A12/B1119 Junction Saxmundham (N)	0	2	2	Minor SZC works																																												
	A12/B1119 Junction Saxmundham (S)	0	1	2																																													
	A12 / Carlton Road, Kelsale cum Carlton	0	2	0	Not assessed by Applicant																																												
S-RJ4	A12/B1121 (North) Junction, Kelsale cum Carlton	0	0	0																																													
	A12/A1120 Junction, Yoxford	0	0	1																																													

Reference Matter	Point Raised					Applicant's Comments
	S-RJ5	A12/B1122 Junction, Yoxford	0	0	0	Discounted as being reconstructed by SZC
	S-RJ6	B1121 Main Road/B1121 Church Hill Junction, Benhall	0	0	0	
	S-RJ7	B1121 Main Road/B1119 Church Hill Signalised Junction, Saxmundham	0	0	0	
	S-RJ8	B1121 Saxmundham Road/Grove Road/Mill Road Junction, Friston	0	0	0	
	S-RJ9	A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction, Friston	0	0	0	
	S-RJ10	A1094 Aldeburgh Road/B1069 Snape Road Junction, Knodishall	0	1	2	Speed limit introduced by SZC
	S-RJ11	A1094/B1122 Leiston Road/Church Farm Road Roundabout, Aldeburgh	0	1	1	
	S-RJ12	B1122 Aldeburgh Road/B1353 Aldringham Lane Junction, Aldringham	0	0	1	
	S-RJ13	B1069 Leiston Road/B1353 Aldringham Lane Junction, Knodishall	0	0	0	
	S-RJ14	A1094/Sternfield Road/Church Road Junction, Snape	0	0	1	

Reference Matter	Point Raised	Applicant's Comments
	<p>11.94 The results mirror those submitted by the applicant.</p> <p>11.95 Pedestrian casualties are restricted to urban areas with three slight injuries recorded in Saxmundham, 1 serious and two slight in Coldfair Green/Knodishall. A serious injury involving a cyclist at the A12/B1121 junction at Benhall and a slight injury on the B1121 between Benhall and Saxmundham. In SCC's view the frequency and severity indicates the vulnerability of cyclists when using rural traffic dominated roads with little provision for cyclists. SCC notes that although the applicant has considered large vehicles, they have not considered vulnerable users.</p> <p>11.96 Of the junctions assessed the one of greatest concern to SCC would be the A12/B1119 junction. Although minor improvements are planned by SZC these are only to mitigate their impact. Of concern is the use of this junction by the Applicant when the B1121 is closed at Benhall.</p> <p>11.97 Links of concern would be the B1069 through Knodishall where 3 serious and 3 slight collisions have occurred within the settlement and the B1119 in its rural section between Saxmundham and Leiston where 1 serious and 10 slight injury collisions have occurred. The B1069 does not feature in the Sea Link assessment but they do concur regarding the elevated rate of collisions on the B1119 east of Saxmundham and that the B1121 through Frison also has higher than expected collision rates. This supports SCC's view regarding the unsuitability of the latter two roads as routes for construction traffic. In SCC's opinion the safety issues on the B11119 are due to the combination of reasonably long stretches of straight road where drivers can travel at speed interspersed with severe bends or changes in geometry which catch out the unwary. Improvements such as removing tight bends could improve safety but would require acquisition of land to do so and come with environmental impacts.</p>	
11.98-11.101	<p>Construction Phase Impacts – Negative – <i>Site Access Points</i></p> <p>11.98 Whist generic accesses are shown in the Design and Layout Plans [APP-037] no topographic surveys have been undertaken to show that the 2-D layouts work in practice, for example the vertical alignment of the existing highway does not compromise visibility or not features such as service would hinder construction. The highway boundary should be clearly shown as should any land proposed as highway to be adopted by the authority.</p> <p>11.99 The visibility splays are likely to require removal or coppicing of vegetation to achieve. SCC's preference is for the latter for temporary accesses subject to suitable maintenance by the applicant.</p> <p>11.100 Drawing DCO/T/DE/SS/1306 [APP-037] states minimum carriageway widths for safe single- and two-way traffic control. With the restricted widths on many Suffolk roads, including B roads, these may be difficult to achieve. The applicant should also note that temporary traffic signals must have adequate width for traffic to pass at the signal heads.</p> <p>11.101 The Applicant has assumed that where speed limits are present vehicles comply with these and hence are appropriate for design purposes. Experience has</p>	<p>The Applicant has continued to liaise with SCC (Highways) throughout the evolution of the access design for the project. Preliminary layout designs have been provided to SCC (Highways) and Stage 1 Road Safety Audits have been undertaken in liaison with SCC (Highways) to inform the submission. Visibility has been assessed for all accesses and visibility splays highlighted within the Application Document 2.13 Design and Layout Plans. The Applicant has supplied preliminary designs, with this detail being appropriate for the DCO application stage. Detailed designs will be submitted for approval by SCC (Highways) prior to construction as required under requirement 12 of the draft DCO.</p> <p>The Applicant notes SCC's preference for coppicing of vegetation where this meets the visibility requirements of the junction. This can be taken forward in detailed design under requirement 12.</p> <p>The Applicant has provided drawing DCO/T/DE/SS/1306 in Application Document 2.13 Design and Layout Plans [APP-037] to provide the minimum required road widths for shuttle working, it is noted that some of the roads affected by the scheme do not meet these minimum requirements which is why road closures have been included within the submission.</p> <p>The Applicant has proposed temporary speed restrictions in some locations as part of a wider set of mitigations for the accesses.</p>

Reference	Matter	Point Raised	Applicant’s Comments																																
		shown that this is not always the case and where reduced speed limits be they existing or proposed as part of the project are used for design purposed this should be supported by survey data showing it is effective or physical measures to achieve the same (example S-AP-14 40mph limit to the south [APP-037]).																																	
11.102 – 11.124	Construction Phase Impacts – Negative – Junction Capacity	<p>11.102 The LHA considers that the following are significant junction within the Applicant’s study area. The authority notes that there are another junction on the A12 under stress due to capacity particularly from the A12/A1152 Woods Lane Junction, Melton to the A12/A14 Seven Hills Interchange albeit these are within the SCCA12 MRN project. To the north the A12/A144, A12/A145 and A12/A1095 junctions have been areas of concern where capacity constraints while within acceptable flows may experience delays on side roads causing safety issues.</p> <p>11.103 It is noted that the Applicant has only assessed delay at junctions in terms of the IEMA guidance, not through modelling. A concern with the Applicant’s assessment is that by only considering delay at two or more limbs this creates a situation where impacts will only be noticeable at crossroads and not where the main route is not constrained by the need to give way.</p> <p>11.104 The junctions for which transport model outputs have been provided in other NSIPs are listed below. This application has not provided any junction modelling. It is worth noting that whilst the data below was assessed by SCC it should not be assumed that the authority fully accepts these as the information provided did not include any of the traffic surveys, data used to calibrate the junction models or drawings highlighting that the junction geometries used within the model are acceptable. This brings inherent risk to each model and means that the results presented need to be treated with a reasonable amount of caution, above the general risk associated with any transport model.</p> <p>11.105 Reviewing the available junction modelling the following points are noted:</p> <p><i>A12/ Woodbridge Road/New Road, Bredfield</i></p> <p>11.106 Concerns about the traffic queueing on the minor arms of the junction were raised in the SZC DCO and a commitment made to monitor the site during construction. The modelling did not consider other NSIPs other than EA1(N)/EA2.</p>	<p>The Applicant has previously responded on comments relating to the assessment of Driver Delay and junction modelling within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p> <p>An assessment of Driver Delay has been carried out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] for 14 junctions (as well as 13 road links) within the agreed study area. The study area for the assessment was defined based on the area where there could potentially be a transport impact resulting from the construction of the Proposed Project. This includes routes along which HGVs will travel during the works programme, as well as the most likely routes that will be used by other construction workers. The study area was defined (and agreed) following discussions with SCC during the initial scoping meeting on 9 June 2023 and when reviewing the proposed scope of the traffic surveys in December 2023. The study area was subsequently refined following further discussions and feedback received during Targeted Consultation.</p> <p>The traffic modelling outputs which have been extracted by SCC from the Sizewell C DCO are noted.</p>																																
		<table><tr><th>Project</th><th>Scenario</th><th>Year</th><th>Am Peak (RFC)</th><th>Pm Peak (RFC)</th><th>Delay am (sec)</th><th>Delay pm (sec)</th></tr><tr><td rowspan="4">SZC</td><td>Early Years - Base</td><td>2023</td><td>0.51</td><td>0.49</td><td>55</td><td>50</td></tr><tr><td>Early Years</td><td>2023</td><td>0.69</td><td>0.58</td><td>106</td><td>71</td></tr><tr><td>Peak Year</td><td>2028</td><td>1.00</td><td>1.00</td><td>390</td><td>445</td></tr><tr><td>Operational</td><td>2034</td><td>0.48</td><td>0.73</td><td>44</td><td>120</td></tr></table>	Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)	SZC	Early Years - Base	2023	0.51	0.49	55	50	Early Years	2023	0.69	0.58	106	71	Peak Year	2028	1.00	1.00	390	445	Operational	2034	0.48	0.73	44	120	
Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)																													
SZC	Early Years - Base	2023	0.51	0.49	55	50																													
	Early Years	2023	0.69	0.58	106	71																													
	Peak Year	2028	1.00	1.00	390	445																													
	Operational	2034	0.48	0.73	44	120																													

A12/ Bell Lane, Martlesham

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

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.38	0.21	33	28
	Early Years	2023	0.51	0.26	65	45
	Peak Year	2028	0.63	0.38	83	48
	Operational	2034	0.42	0.31	35	44

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

A12/B1121 Benhall junction

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

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

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

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

A12/B1121 Dorleys Corner Kelsale cum Carlton

Project	Scenario	Year	Am Peak (RFC)	Pm Peak (RFC)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	0.20	0.24	11	10
	Early Years	2023	0.23	0.24	12	12
	Peak Year	2028	0.22	0.26	12	11
	Operational	2034	0.30	0.25	13	12

A12/A1120

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

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

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

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

A12/B1387 Blythburgh

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

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

A12/A145

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

A12/A1095 Blyford

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

A12/B112 Wrentham

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

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

SZC	Early Years - Base	2023	0.33	0.49	19	24
	Early Years	2023	0.42	0.71	21	38
	Peak Year	2028	0.37	0.61	21	34
	Operational	2034	0.38	0.56	21	29

A1094/B1069 Snape Crossroads

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

A1094/B1069 Knodishall (SPR Junction 3)

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

Early Years	2023	0.80	0.66	38	26
Peak Year	2028	0.77	0.78	35	38
Operational	2034	0.77	0.77	35	38

B1119 Waterloo Avenue / B1122 Station Road/ B1069 Park Hill

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

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

B1119/B1121 Saxmundham Crossroads

SZC data shows this signalised junction is already over the theoretical capacity. Improvements have been made to the signals such as retrofitting MOVA. Local knowledge would support the data with significant delays on a daily basis particularly on the B1119 from the east exacerbated by the presence of the two supermarkets. Although only peak and shoulder hours were assessed there is concern that delays occur throughout the day and therefore should be assessed.

Project	Scenario	Year	Am Peak (DoS%)	Pm Peak (DoS%)	Delay am (sec)	Delay pm (sec)
SZC	Early Years - Base	2023	89%	108%	94	219
	Early Years	2023	89%	120%	94	379

Reference Matter		Point Raised	Applicant’s Comments					
			Peak Year	2028	93%	108%	109	315
			Operational	2034	95%	107%	114	211
		<p>11.123 A number of A12 roundabouts south from Woodbridge (A1152) to Foxhall Road, are shown to be at or approaching capacity. However, a planning application for the A12 Major Road Network Scheme is expected to be submitted shortly which intends to address some of these issues through modal shift and targeted highway capacity improvements. It is expected that construction will not start until 2027 and will last approximately two years.</p> <p>11.124 The mitigation measures implemented by the EA1N, EA2 and Sizewell C projects are detailed in the “Required Mitigation” section of this chapter</p>						
11.125	Construction Phase Impacts – Negative – <i>Construction Traffic Access Routes</i>	<p>11.125 Specific issues on the proposed construction traffic access routes are:</p> <p>a) A12 Seven Hills to Lowestoft (includes S-RJ1, S-RJ2, S-RJ3, SRJ4; S-RL1, S-RL-2, S-RL3, S-RL4):</p> <ul style="list-style-type: none">• Poor geometry at Farnham including buildings close to carriageway (this will be mitigated by Two Village Bypass).• Poor road geometry at Blythburgh (only a potential issue for AILs being brought from Lowestoft).• Poor safety record at A12/A1094 junction – Works have begun on the Two Village Bypass roundabout at this junction and traffic management has been deployed, significantly lowering traffic speeds. Two Village Bypass is due to be completed by late 2027, which would mitigate this issue.• Variability in traffic flows with the usual network peaks being overlain by seasonal tourist traffic.• Concern over delays and road safety caused by increased traffic turning traffic from the A12 onto the B1121 at Benhall and vice versa.• Varying speed limits along the length of the A12 from Lowestoft down to the A14 at Seven Hills Interchange.• Delays causing frustration for drivers exiting minor roads onto the A12 such as the Bredfield / Hasketon and Bell Lane, Marlesford junctions (road safety and delays to local traffic).• Poor safety record at the junction with the B1119 west of Saxmundham.• A narrow footway between Marlesford to Wickham Market bypass, causing pedestrian anxiety• Road safety concerns and delays at the northern junction of the B1121 and A12 known as Dorleys Corner.• Capacity restrictions on structures along the length of the A12.	<p>The Applicant has previously responded on comments relating to network constraints within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p> <p>The constraints identified by SCC are noted. The construction vehicle routing has been planned to minimise impacts across the highway network, as set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]. Construction phase transport effects (including with respect to Driver Delay/ congestion and Road Safety) are assessed within Application Document 6.2.2.7 Part 2 Chapter 7 Traffic and Transport [APP-054]. This demonstrates that the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay/ congestion), with the identified mitigation in place (to be secured by the aforementioned management plan through requirement 6 of the draft DCO).</p>					

Reference Matter	Point Raised	Applicant's Comments
	<ul style="list-style-type: none"> • Passes through settlements of Marlesford, Little Glemham, Yoxford, Blythburgh and Wrentham. 	
	<p>b) A1094: A12 Farnham to Aldeburgh (includes S-RJ9, S-RJ10, S-RJ11, S-RJ14; SRL10, S0-RL11)</p> <ul style="list-style-type: none"> • Poor safety record at junction with A12 - TVB roundabout will be completed by the end of 2027 to mitigate this • Poor road geometry - Narrow and winding in several areas, e.g. between River Fromus and Snape • Tourist route access to Aldeburgh with significant seasonal variations • Concerns over capacity and delay and hence road safety issues at the A1094/B1069 Church Common crossroads, particularly traffic exiting onto the A1094 from Snape. • Weight restriction on railway bridge of 46 tonnes • Geometry of roundabout at the A1094/B1122 in Aldeburgh where issues relating to movement of articulated vehicles were identified during the SPR examination • Poor vertical geometry to the west of Aldeburgh • Scattered dwellings with multiple private accesses • Poor geometry and visibility at minor road junction 	
	<p>c) B1121: A12 Benhall to A12 Dorleys Corner (S-RJ6, S-RJ7; S-RL5, S-RL6): The B1121 comprises a number of sections each with differing characteristics and sensitivities:</p> <ul style="list-style-type: none"> • A12 to Benhall: Narrow footway and scattered accesses serving local industry and Whitearch Residential Park. • Benhall Village to B1121 junction: Road skirts the main settlement which contains a school and community centre. Narrow footway is located on the opposite side to the settlement, and no formal crossings are present. Clusters of dwellings are present on the west side requiring residents to cross the B1121 to access the village, as is the case for the bus stops. • B1121 junction to Saxmundham. No settlement and one business. Narrow footway on west side abutting the carriageway links Benhall to Saxmundham • Saxmundham. Significant local settlement with main services such as supermarkets, shops, surgery, and schools serving a significant area of East Suffolk. Narrow roads and footways constrained by buildings. Primary school located on Brook Farm Road. • Kelsale cum Carlton to Dorleys Corner and the A12. Greater spacing to residential and business areas but includes direct access to industrial estates, camping sites, residential clusters, and local road servicing villages such as Kelsale and Carlton. Primary school located on Carlton Road. Although many facilities are not located on the proposed 	

Reference Matter	Point Raised	Applicant's Comments
	<p>construction access routes many are close and have to be used by vulnerable road users to access them or move within their communities.</p> <ul style="list-style-type: none"> • Major concerns over the structural condition of the railway bridge at Benhall. • Major concerns regarding the traffic signal-controlled crossroads in Saxmundham town centre, including capacity, delay, and geometry. • Primary School and Community Centre in Benhall • Height restriction due to railway bridge to the north of Saxmundham Town centre. • On street parking north of railway bridge in Saxmundham. • Severance of Benhall from Saxmundham for cyclists and pedestrians due to narrow or absent footways and infrequent informal pedestrian crossings. 	
d)	<p>B1121: from Benhall to A1094 Friston (S-RJ8, S-RL8):</p> <ul style="list-style-type: none"> • Poor road geometry and narrow road widths in Sternfield and buildings close to the carriageway that constrain geometry, visibility and are at risk of impact. • Severance of Sternfield from Saxmundham for cyclists and pedestrians due to lack of footways and narrow verges. • Restricted road width and bends between Sternfield and Friston. • New permanent access road into the Friston Substation site from the B1121 north of Friston • Difficulty in HGVs navigating junction with A1094 at Friston turning to and from the west. • B1121 passes through centre of Friston and is adjacent to a playground <ul style="list-style-type: none"> • Poor visibility at existing junctions e.g. Church Lane Friston. 	
e)	<p>B1119: Saxmundham to Leiston (S-RL7):</p> <ul style="list-style-type: none"> • Narrow road width in Saxmundham • On street parking in Leiston and Saxmundham causing delays • Concern over capacity and delay issues at the signal-controlled crossroads in part associated with two supermarkets in Saxmundham • Surface water flooding issue near the Saxmundham level crossing • Poor road geometry in places along the length of the B1119 with several sharp bends and narrow sections 	
f)	<p>B1069: A1094 Knodishall to Leiston (S-RJ13, S-RL12):</p> <ul style="list-style-type: none"> • Capacity and delay at signal-controlled crossroads in Leiston • Passes through the village of Knodishall which has limited crossing facilities for pedestrians 	

Reference Matter	Point Raised	Applicant's Comments
	<ul style="list-style-type: none"> Primary School on Judith Avenue and lack of formal crossing points severing community. Narrow footways in Knodishall and Leiston Narrow sections including approach to A1094 that is being widened by SPR. <p>g) B1122: Yoxford to Theberton</p> <p>Note that in part the SLR delivered by SZC will remove most traffic between the new Middleton Link Road and the tie in east of Theberton. Delivery is anticipated late 2027.</p> <ul style="list-style-type: none"> Winding rural road with pinch points Scattered residential dwellings and businesses Concerns over capacity and delay at two sets of signal-controlled crossroads in Leiston Currently also being used by Sizewell traffic prior to the construction of the Sizewell Link Road Several pinch points through Leiston, including a level crossing Scattered dwellings with multiple private accesses between Yoxford and Leiston Multiple minor roads emerging onto the B1122 <p>h) B1122: Theberton to Leiston</p> <ul style="list-style-type: none"> Subject to some improvement by SZC including creation of new roundabout south of Eastbridge serving as a main site access. Level Crossings on Abbey and Station Roads carrying trains delivering materials to SZC. Narrow footways and lack of formalised crossings in the northern outskirts of Leiston. <p>i) B1122: Leiston to Aldeburgh (S-RJ12, S-RL13)</p> <ul style="list-style-type: none"> Passes through centre of Leiston where pedestrians and cyclists are common, footways not to newer standards (e.g. LTN 1/20) along a number of signalised junctions with pedestrian facilities are present. Primary and Secondary School and Leisure Centre are located a short distance east of the B1122 in Leiston. Residential road with parked cars along both sides Poor vertical geometry south of Altringham (hidden dips) Scattered dwellings with multiple private accesses 	
11.126- 11.129 Construction Phase Impacts – Negative – <i>Benhall Rail Bridge</i>	11.126 There are major concerns over the proposed use of the railway bridge at Benhall for the use of construction traffic. There is a weight restriction of 46 tonnes which makes it unsuitable for several of the proposed vehicles needed to access the site via the Proposed Access S-BM09.	Responses to comments on Benhall Rail Bridge have been provided previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).

Reference Matter	Point Raised	Applicant's Comments
	<p>11.127 There is currently a lack of clarity on the Applicants proposed mitigation measures and their potential impact. These relate to:</p> <ul style="list-style-type: none">the duration of any road closuretemporary traffic management and effects on the A12 junction through backing up of trafficthe impact on road users in terms of safety and delay, on residents and businesses on any diversion route,residents and landowners adjacent to the structure especially now the red line has been extended beyond the highway boundary.Protection of and access to buried utilitiesSafety of and access for pedestrians and cyclists on the B1121 and those wishing to use to footway alongside the rail line. <p>11.128 Overbridging requires 3 days of road closures each time the bridge is erected and dismantled. With potentially 7 proposed transformer movements along this route there will be significant delays on the road network, including severance between Saxmundham and the Whitearch Park residential homes. There would also be a significant diversion route through Saxmundham town centre, which has narrow pinch points along the high street and a height restricted railway bridge.</p> <p>11.129 Semi-permanent bridging will require traffic signals once the bridge is in place, which has the potential to cause traffic to queue back onto the A12. Even with a priority signal for traffic coming off the A12, there would still very likely be tailbacks onto the A12 due to the significant increase in traffic here.</p>	<p>Further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], as no new or different likely significant environmental effects have been identified.</p>
11.130-11.134	<p>Construction Phase Impacts – Negative - <i>Developments in Benhall</i></p> <p>Planning Application DC/21/2503/OUT: Land South Of Forge Close Benhall Saxmundham Suffolk: Outline Application with Some Matters Reserved - Erection of up to 41 dwellings (with details of access to be considered:</p> <p>11.130 It is understood that the application has been granted by ESC although the planning website has not been updated. Initially the LHA responded with a holding objection primarily on the grounds of poor sustainable access between the site and Benhall village. To resolve this matter the Applicant has proposed a cycleway along the east side of the B1121 to Forge Close and some minor footway improvements along Forge Close. The uncontrolled pedestrian crossing over the B1121 and adjacent bus stops will have minor improvements but limited in terms of pedestrian and cycling connectivity over the B1121. However, these proposals do not materially improve connectivity nor reflect the increase traffic that will use the B1121 to construct the Sea Link project.</p> <p>11.131 The access into the site has only been assessed in terms of a residential estate, not for large vehicles that may be associated with the Sea Link project.</p>	<p>The decision the grant consent for application DC/21/2503/OUT at the Planning Committee on 28 October 2025 was acknowledged in Application Document 9.7 (C) (Version 2, Change Request) Applicant's Schedule of Changes to the Draft Development Consent Order [CR1-051] and taken into account in decision making on the final changes requested on 26 November 2025 and accepted by the Examining Authority on 5 December 2025. The final change request did not include land subject to the residential planning application and no vehicles for the Sea Link application will use the access planned for the residential site. It is noted that no Decision Notice has yet been published.</p> <p>Temporary road closures and works happen on a routine basis on the highway network and these works would be appropriately planned, managed and approved through the final Construction Traffic Management Plan prepared under requirement 6; and, in the case of Abnormal Indivisible Load (AIL) vehicles, separate processes to agree these movements.</p> <p>The works required to Benhall Bridge to install a mini-bridge are business as usual for a AIL contractor and the interactions between the traffic management and any construction vehicles accessing the small consented residential site can be managed on this basis. Access to all residential properties would be maintained throughout works on the highway associated with Sea Link; including to any residential properties constructed at the consented site.</p>

Reference Matter	Point Raised	Applicant's Comments
	<p>11.132 Timing of the delivery of this site is unknown but any traffic management on the B1121 at Benhall Rail Bridge would adversely affect access either during construction or when occupied.</p> <p>11.133 This site is not included in the list of committed developments in the Traffic Assessment Note [APP-122].</p> <p>Planning Application DC/24/4367/FUL: Change of Use From Agricultural Land to Dog Walking and Exercising Facility and Formation of Vehicular Access¹</p> <p>11.134 Construction of the site access commenced in November 2025. The proximity of this access and impacts on Sea Link's proposed access to the Fromus Bridge have not been assessed.</p>	<p>The consented site was subject to a planning application submitted in May 2021, so had been on hold for a very long time before being consented in October 2025. No programme is yet available for the construction of the site so it is not yet known whether there will be an overlap in the construction period for the site and the short term traffic management required at Benhall Bridge. However, given the short term nature of any closures, any interaction can be managed through good communication between parties and forward planning in the Construction Traffic Management Plan.</p> <p>In terms of the list of committed developments considered on the Environmental Impact Assessment, the small-scale nature of the development (less than 50 dwellings) would have meant the development was screened out of consideration for assessment on traffic. This is because any potential increases in traffic levels as a result of the operational phase of the scheme will have been treated through the application TEMPro growth and is not sufficiently large to warrant consideration as a stand-alone development.</p> <p>Application DC/24/4367 is also too small to be considered in its own right from an environmental impact assessment perspective and as the application was validated in December 2024, was submitted too late to be considered in the cumulative impact assessment for the project. From an access perspective this access and the one for the Sea Link project would be on the same side of the carriageway, reducing the likelihood for interactions between vehicles turning to/ from each access and visibility splays should also remain clear. It is therefore not considered likely that this minor application will pose a significant issue for the access design for Sea link. However, the final detailed design would take into account the highway network at the time of discharge of requirements and would therefore consider this access.</p>
<i>Pedestrian and Cycle Improvements, Benhall and Saxmundham</i>	<p>11.135 SCC, in partnership with Benhall Parish Council and East Suffolk Council are prompting improvements in Benhall. These comprise:</p> <ul style="list-style-type: none"> i. Modal filters on School Lane to prevent through vehicular traffic and promote sustainable transport (subject to consultation on traffic regulation order) ii. Improvements to the uncontrolled crossing adjacent to the B1121/School Lane junction to allow safer access across the B1121 and upgrading the footway to a shared use cycle route to make the route from School Lane to Saxmundham suitable for cyclists. iii. Creation of a surfaced bridleway in the field west of the B1121 between the B1121 Sternfield Junction and Saxmundham subject to agreement by the landowner to provide a safe amenable route screened from the carriageway. <p>11.136 Funding has been agreed for preliminary design work, and this has commenced. Financial support for delivery is also agreed in principle but is subject to final construction and ancillary costs. The project has been</p>	<p>The Applicant notes this comment.</p>

¹ <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?previousCaseType=Application&keyVal=SO17DVQXG7200&previousCaseNumber=DC%2F25%2F2031%2FDRC&activeTab=summary&previousKeyVal=SWM02HQXJH100>

Reference Matter	Point Raised	Applicant's Comments
11.137 – Construction 11.151 Negative Impacts - Abnormal Indivisible Loads		
	11.137 As LHA, SCC is committed to maintaining its stock of bridges to enable use by normal highway traffic as far as reasonably practical with the available funding. This excludes AILs >44 tonnes in weight.	The constraints on Abnormal Indivisible Loads (AILs) are acknowledged and these will be strictly managed as set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008] . The condition of the existing highway network is continually evolving and it is normal practice for an Abnormal Indivisible Load (AIL) contractor to need to navigate restrictions and constraints along a network between the point of departure and arrival. The restrictions affecting the network in Suffolk do not present abnormal or unusual challenges to an AIL contractor, who have standard practices to overcome restrictions. These measures also provide impediments to the use of the western access. Consent is required for AIL movements, with this consent being predicated on a survey of the route (as present prior to delivery) and proposals to overcome any constraints. These consents are always sought after a DCO because they need to take into account the precise source of a delivery (which cannot be determined with certainty prior to decisions on the purchase of materials), timing of deliveries and the current condition of the highway network. It is not necessary or proportional to provide these details at the application stage.
	11.138 SCC understands that details of the AIL movements remains to be confirmed but are assumed to be:	
	i. 80 Cable drum movements (40 in and 40 out, will require a police escort)	
	ii. 7 Transformers (will require police escort)	
	iii. 30 other AILs (15 movements in and 15 movements out, likely to be cranes, piling rigs. No dimensions given at this stage and not clear if they will require an escort).	
	iv. Expected movement period for AILs: Q3 2028 – end of Q1 2029.	
	v. Port not yet confirmed but anticipated to be Lowestoft.	
11.139	The overarching National Policy Statement for Energy (EN-1) identifies Traffic & Transport, including abnormal loads generated during the construction phase, as an impact where the Secretary of State recognises the need for appropriate mitigation to ensure satisfactory arrangements in consultation with network providers and the responsible police force. SCC expects this principle to be reflected in the identification and securing of appropriate developer funded highway and police resources.	The Applicant will continue to liaise with SCC (Highways) and the Police on the proposed movement of AILs through Suffolk. Information on the proposed routes has been shared with stakeholders over a number of years prior to submission at a level of detail appropriate to the project development. The Applicant is in discussions with the Police and SCC on the level of funding necessary to cover the costs of managing and assisting the movement of AILs including the provision of escorts where deemed necessary by the police.
11.140	The nature of the local highway network required police escort particularly where: i. The roads are narrow, or the geometry requires a load to move into the oncoming lane. The movement of wide and long loads is problematic on the existing constrained local road network, particularly on B class roads where the road widths are in places less than 5.5m wide; the width considered necessary for two HGVs to pass (Manual for Streets) on a straight road. Where wide or long loads straddle centrelines, particularly those where no overtaking restrictions are present require escort by the police. ii. Special order Loads and others were deemed necessary by the constabulary. For SZC a matrix was developed to formalise this. iii. Special restrictions apply to structures such as prevention of other vehicles using the road when loads are passing over bridges (e.g. A12 Little Glemham).	
11.141	Thus, NSIP developments create heightened demand for police escorted Abnormal Indivisible Loads (AILs) during construction. Suffolk Constabulary does not have a dedicated AIL team, and escorts are currently provided on an overtime basis when capacity allows. Therefore, where sustained demand is identified a bespoke solution - such as a dedicated AIL team - may be necessary, subject to appropriate lead-in time and developer funding.	The Applicant welcomes the receipt of SCCs details on how it expects the assessment process to be undertaken, as received on 02/12/2025, and will look to engage with this process as the project develops.
11.142	AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter	

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

Reference	Matter	Point Raised	Applicant's Comments	
	<i>Construction Negative Impacts – Benhall Railway Bridge</i>	11.152	The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits.	Further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] . This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] , as no new or different likely significant environmental effects have been identified.
		11.153	Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. SCC understands that temporary overbridging would require the Benhall Bridge to be closed for at least three days for each AIL movement. This approach would significantly hinder access between the A12 and Saxmundham, likely leading to significant effects on road user delay and on the capacity of diversion routes. It is essential for the impacts of this approach to be assessed by the Applicant should it seek to gain development consent with this option for AIL deliveries retained.	
		11.154	With the current restrictions and potential for substantial adverse impacts, this route would not be resilient for long term access to the Saxmundham converter station site, and The Council considers there are serious concerns regarding deliverability.	
		11.155	The Council considers that action is required to provide more detailed information regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.	
11.156-11.162	<i>Construction Negative Impacts – Environmental Assessment Methodology</i>	11.156	In addition to issues around the scope of the assessment and junction modelling discussed in this section, SCC has other concerns over the assessment methodology used with the application.	SCC's comments on the assessment methodology and sensitivity levels assigned to receptors are acknowledged by the Applicant. The assessment work within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] follows the 2023 Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement, which is considered to be appropriate for informing the methodology and sensitivity levels derived. Five different Tables to categorise sensitivity levels across the receptors within the study area have been identified, using quantifiable criteria where possible. This has resulted in a range of sensitivity levels being assigned including Medium and High for the most sensitive receptors and assessments. Therefore, this is considered to offer both a reasonable and proportional approach to the eight categories of assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] , which considers 13 road links, 14 junctions and 17 Public Rights of Way (PRoW) and four walking/ cycling routes, within the agreed study area. Further to the above, the approach taken for identifying road link receptors and assessing impacts on severance, pedestrian delay, non-motorised user amenity and fear & intimidation is considered to be consistent with the approach taken by SPR within the EA1N/ EA2 ES'. For example, a similar number of links have been
		11.157	Typically, in this part of Suffolk local roads connect nodes of settlement resulting in significant differences to the character of the highway, for example sections of open road with few junctions, dwellings or businesses between clusters of houses. Services such as schools and community centres are located o , but close to, routes but away from parts of the settlement proposed for construction traffic requiring local residents to cross these routes.	
		11.158	In response to the project's statutory consultation in December 2023, SCC raised concerns regarding the cumulative impact of NSIPs including Sea Link on the transport network including areas outside the scope considered by the Applicant.	
		11.159	Traditional assessments for DCOs such as the IEMA guidance are useful tool for assessing the construction traffic impacts albeit the focus	

Reference Matter	Point Raised	Applicant's Comments
	<p>is on regionally significant impacts. As a result, the fine detail of local impacts such as the small communities in Suffolk can, in SCC's opinion, be lost. SCC consider this has been the case with the Sea Link assessment where sections of road have been treated as uniform when there are significant differences in sensitivity. Also, that whilst small in terms of national scale this impact can have a major impact on such small communities. An example would be the B1121 from the A12 south of Benhall to the A12 at Dorleys Corner. This, in SCCs opinion, forms a number of discrete sections:</p>	<p>assessed, for similar lengths between key junctions. Furthermore, the sensitivity levels assigned for road links within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] for the aforementioned assessments is largely comparable to those adopted for Sizewell C and EA1N/EA2. Whilst some receptors have been assigned lower levels of sensitivity, the majority are of a similar level and some receptors have conversely been assigned higher levels of sensitivity. The study areas are also different, which influences the extents and characteristics of the links included, particularly for the A12. In addition, Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] assesses the potential impacts of the Proposed Project on severance, pedestrian delay, non-motorised user amenity and fear & intimidation at road junctions, whereas the other DCOs do not appear to. The Applicant welcomes further discussions with SCC with respect to the assessment methodology, which is considered to be robust.</p>
	<p>i. A12 Benhall to the junction with the Church Hill B1121 towards Sternfield. 40mph speed limit. Narrow footway on one side. Primary School located in Benhall. Scattered roadside development including businesses and dwellings. Number of minor and one B road junction. Limited informal crossing points but significant need to crossroad as main residential areas on opposite side of road to footway.</p>	<p>Responses to comments on inter-project cumulative effects have been provided previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]). It is not considered that any amendments need to be made to the cumulative assessment in view of the above.</p>
	<p>ii. B1121 Church Hill junction to South Entrance. No roadside development. De-restricted until Church Hill junction. Narrow footway immediately adjacent to carriageway. Moderate use by pedestrians and cyclists. No formal crossing points nor reason to do so.</p>	
	<p>iii. Saxmundham Town to Brook Farm Road. 30mph speed limit but geometry reduces actual speeds. High pedestrian and cycle use.</p>	
	<p>Narrow but continuous footways. Formal and informal crossing points. Shops, dwellings and businesses in close proximity to carriageway.</p>	
	<p>iv. B1121 from Saxmundham to north of Bridge Street Kelsale: 30mph limit but wide straight road may make compliance difficult. Significant but including Primary School located o Carlton Road and intermittent roadside development including industrial, residential and tourist facilities. Reasonable quality footways on one side or both. Moderate pedestrian and cycle use</p>	
	<p>v. B1121 to Dorleys Corner. 40mph speed limit. Intermittent roadside development. Narrow metalled footway throughout. Limited pedestrian and cycle movements. No formal crossing points but limited need.</p>	
11.160	<p>The assessment methodology used within the DCO submission relies heavily on IEMA assessment method. At previous consultation stages the Councils raised the use of this method as problematic given that it can often fail to fully assess the specific transport-related impacts of development. The IEMA guidance is one method of analysing the impacts in terms of risks to receptors. However, it is considered to be a coarse tool which does not sufficiently allow for factors such as junction geometry, design guidance (e.g. visibility) and most importantly the changes in traffic and driver behaviour. Assumptions made for strategic roads considered in the Design Manual for Roads and Bridges may also not be applicable to local roads which will not have been designed to</p>	

Reference	Matter	Point Raised	Applicant's Comments
		assessment methodology focusses on large scale regional impacts and in SCC's view underestimates the impacts on individuals and small communities typical in this part of Suffolk.	
		11.168 It is noted that impacts on B roads and local road network are considered by the Applicant to be major adverse to moderate adverse, but no mitigation is proposed.	
		11.169 The intra-project cumulative impact assessment [APP-059] in 12.2.2 states that there will be some adverse impact on transport users with no mitigation confirmed. Mitigation or appropriate compensatory measures must be implemented in relation to these impacts: i. Whilst noise and vibration and impacts including severance, pedestrian delay, fear and intimidation are minor the combination of all these impacts could have a significant effect upon transport users. No mitigation has been confirmed at this stage.	
11.171- 11.201	Construction Negative Impacts – <i>Inter-Project Cumulative Effects</i>	<p>In its relevant representation (paragraphs 31-33), SCC raised concerns over the cumulative effects of the project in combination with other major infrastructure schemes being constructed in the area such as Sizewell C, EA1N and EA2. SCC also raised these concerns in response to the project's statutory consultation.</p> <p>11.171 The Applicant's cumulative effects assessment only refers to a select number of locations and not the cumulative impact on the A12 between Seven Hills and Lowestoft. The LHA has concerns regarding the additional construction traffic in combination with other NSIPs creating delay and safety issues specifically at junctions such as Bell Lane, Marlesford and Bredfield Road, Bredfield where frustrated drivers may take chances joining the A12 in smaller gaps in the traffic.</p> <p>11.172 Proposed or consented development which should be included in the cumulative effects assessment for traffic and transport purposes include:</p> <p>11.173 Significant residential development is under construction in the area with 2,000 homes at Brightwell Lakes at Martlesham and planned residential growth south of Saxmundham and o Humber Doucy Lane east of Ipswich.</p> <p>11.174 A number of solar farms consented through the Town and Country Planning Act are either being built of in the decision-making processes. For instance, the solar farm at Kelsale</p> <p>11.175 SCC has submitted a planning application for the A12 Major Road Network Scheme between Woods Lane, Melton and the A12/A14 Seven Hills Interchange and is consulting on active travel projects in Ipswich and Melton. This is likely to overlap temporally with the construction period of Sea Link creating further impacts on the A12. Whilst this area lies outside of Sea Link's study area, much of the project's construction traffic will use the A12 south of Woods Lane meaning there will be in-combination adverse effects from the projects on this part of the A12 for road users.</p> <p>11.176 Key areas of cumulative interproject impact are considered to be:</p> <p>i. A12 Seven Hills to Lowestoft: Sea Link, SZC, EA1N, EA2, Lion Link</p> <p>ii. A1094 Friday Street to B1069 Knodishall: Sea Link, SZC (light traffic), EAN1, EA2, Lion Link</p> <p>iii. A1094 from B1069 Knodishall junction and B1122 to B1353 Aldringham: Sea Link, EA1N, EA2.</p>	<p>Responses to comments on inter-project cumulative effects have been provided previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p> <p>Further to the above, the Applicant has undertaken inter-project cumulative traffic and transport effects assessment for all projects for which forecast construction traffic information was available at the time the assessment was carried out. This is reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] with further explanation provided in Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]. This concludes that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in paragraph 1.27 of the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement).</p> <p>It is also in the Proposed Project's (and third party projects') interest, in terms of both efficiency and delivery need, to keep to programme and minimise the potential for peak construction activity to overlap with other schemes. The Applicant is committed to ongoing engagement with other projects to identify potential opportunities for coordination during project delivery and to minimise potential highway impacts, and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes</p> <p>As and when information becomes available for any new projects, the Applicant will screen the developments and undertake any additional assessment in line with the PINS advice on cumulative effects assessment (Planning Inspectorate, 2024).</p>

Reference Matter	Point Raised	Applicant's Comments
	iv. B1069 from A1094 to Knodishall: Sea Link, SZC (light traffic), EAN1, EA2, Lion Link	
	v. B1121 from A12 to River Fromus Bridge: Sea Link, Lion Link	
	vi. B1121 to Saxmundham and B1119 towards Leiston: Sea Link, Lion Link	
	vii. B1122 from Yoxford via Leiston and B1069 and B1121 to Friston (AIL only): Sea Link, EA1N, EA2, Lion Link	
	11.177 SCC also has concerns with how the Applicant has assessed the cumulative effects of the proposed development with other NSIPs in the area.	
	11.178 The Sea Link programme overlaps with EA1N and EA2, with all projects utilising the same proposed substation at Friston. Sea Link is proposed for construction from 2026 – 2031, with EA2 currently underway and EA1N to follow completion of EA2. This will result in a significant increase in traffic, particularly HGVs, around the Friston and Saxmundham areas.	
	11.179 The Sizewell C project is also under development and has significantly increased the amount of traffic in the local area, particularly along the A12 and B1122 (which is the main access route to the site). Several Sizewell C on site developments will also be impacting local traffic, including construction of the Friday Street, Yoxford and Stratford St Andrew roundabouts on the A12, the Two Village Bypass, Sizewell Link Road and the Northern and Southern Park and Rides (at Darsham and Wickham Market respectively), although SCC remains hopeful that these will all be completed before Sea Link commences construction.	
	11.180 Future projects in the local area include Lion Link, which is currently at the pre-app stage, and Helios which we currently have no information on other than the location (Friston). Whilst the overlap of these projects with Sea Link will be less than those of EA1N, EA2 and SZC, there is still potential for an even more significant increase in traffic. This is particularly true with Lion Link, which is potentially going to be submitted to the Planning Inspectorate in Q1 2026.	
	11.181 Experience from data with SZC and EA2 is that significant pressure is being put on the capacity of laybys and rest areas for HGVs leading to complaints from both local residents and hauliers. There is a shortage of welfare facilities for HGV drivers, and the Applicant is strongly recommended to provide such facilities and parking for legal breaks at all large site compounds.	
	11.182 Much emphasis is placed on peak traffic from projects such as SZC, EA1(N) and Lion Link not overlapping with Sea Link, but this is not evidenced. NSIPs under construction within East Suffolk and likely to overlap with delivery of this project (if consented) are EA1(N), EA2 onshore works and construction of Sizewell C.	
	11.183 It is noted that one of the peaks in construction traffic associated with EA1(N) and EA2 relates to removal of the haul road at the end of the project. The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables' EA1N and East Anglia THREE ("EA3") will still be within their construction phase and Lion Link may also commence within this period.	
	11.184 By assuming that any peak periods will not overlap, the cumulative effects assessment for SZC seems to concentrate on the construction of the highway works associated with the project and not the worker movements to and from the main site. In a similar way, the construction of residential sites are considered but not traffic arising from its intended use.	

Reference Matter	Point Raised	Applicant's Comments
	<p>11.185 Initial calculations from data available from this application, SPR and SZC indicate that in combination the schemes would increase HGVs on the A12 by around 150% from the 2028 base or if SPR is excluded around 120%.</p> <p>11.186 No traffic data is provided in the application to summate traffic arising from background use, EA1(N) / EA2 and SZC traffic on the A1094 between the A12 and B1069 in terms of environmental impact or congestion. The LHA raises concerns regarding the delays at traffic turning out of the B1069 from Snape, particularly at peak periods such as the holiday season or when events are held at Snape Maltings.</p> <p>11.187 In terms of impact, it is forecast that the HGV movements associated with Sea Link will peak at 173 deliveries (346 two-way movements) as shown in table 7.26 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This compares with 210 two-way HGV movements for SPR EA1N or EA2 (Scenario 2 sequential delivery) or 700 two-way HGV movements for SZC in the peak year. For these projects the Applicant accepted the need to undertake sensitivity testing on the cumulative impacts of the projects which modified the form of mitigation proposed.</p> <p>11.188 The impacts on junction capacity and delay on the A12, in particular, have not been considered in Table 7.6 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. By placing emphasis on delays on 2 or more arms of junction this automatically dismisses impact on through junctions where only one or two arms that give way to free-flowing major roads.</p> <p>11.189 In the Transport Assessment Note [APP-122] the developer is correct that no HGVs arising from this project are assumed to use the Sizewell Link Road (when complete) and B1122 but has not considered that light vehicles associated with the project are not so restricted and a proportion will use this route as will special order AIL movements to and from the B1121 Friston access.</p> <p>11.190 SZC has projected the following vehicle movements of which the HGV daily numbers are capped: Early years (2024-2027)</p> <p>11.191 600 HDV two-way movements equivalent to 300 deliveries (heavy delivery vehicles, all vehicles >3.5tonnes including buses) restricted to the A12. SZC estimated that 15% of these will route north of Yoxford and 85% from the south (i.e. A14).</p> <p>Peak Years (2028-2030)</p> <p>11.192 At the estimated peak years, the number of HGVs (>3.5 tonnes) will be 700 two-way movements restricted to the A12, B1122 and SLR with and additional buses shuttling between the park and rides and main site again via the A12, B1122 and SLR.</p> <p>11.193 The impact assessment presented in the ES considers the proposed EA1N and EA2 projects under two construction scenarios:</p> <p>i. Scenario 1 - the proposed EA1N and EA2 projects are built simultaneously; and</p> <p>ii. Scenario 2 - the proposed EA1N and EA2 project are built sequentially.</p> <p>11.194 As EA1(N) was unsuccessful at the recent energy bids the projects are being delivered sequentially (i.e. scenario 2)</p> <p>11.195 With the application of an employee to vehicle ratio of 1.5, the number of daily light vehicle arrivals would be 220 for the proposed East Anglia TWO project (scenario 2) and 271 light vehicles associated with the simultaneous construction</p>	

Reference Matter	Point Raised	Applicant's Comments
	<p>Outline Travel Plan 7th June 2021 Applicable to East Anglia TWO Page 9 of the proposed East Anglia TWO and East Anglia ONE North projects (scenario 1).</p> <p>11.196 Data for the Sea Link project, provided in table 5.1 and 5.2 of the OCTMP [AS008], indicates a maximum of 173 HGV arrivals and departures (i.e. 246 twoway HGV movements) in 2027 and a maximum of 502 combined worker and LGV movements in 2028. This is comparable with the SPR projects.</p> <p>11.197 The proposed project, in combination with Sizewell C, EA1N and EA2, will:</p> <p>11.198 result in a significant increase in HGV movements on the A12, potentially both to the north and south of Saxmundham.</p> <p>i. exacerbate pre-existing issues along the A12 route.</p> <p>ii. result in SPR traffic from the south traveling through the four villages (Marlesford, Little Glemham, Stratford St Andrew and Farnham, with negative impacts on air quality, noise, severance, road safety and congestion, especially the pinch point at Farnham bend where large loads manoeuvre very close to buildings.</p> <p>iii. Increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1069, B1122, B1121.</p> <p>iv. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.</p> <p>v. increase HGV movements along the A12, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.</p> <p>vi. reduce the attractiveness of core strategic routes, such as the A12, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads.</p> <p>vii. increase wear and deterioration of roads and structures due to the additional traffic.</p> <p>11.199 By comparison, table 13.31 of the inter-project cumulative effects assessment [APP-060] only assesses the cumulative effects of Sizewell C and Sea Link in terms of pedestrian severance and delay and fear and intimidation for a limited selection of receptors. This can partially be explained by the Applicant's limited study area which, SCC has argued, does not fully capture the impacts of the project. The evidence presented by SCC in this section strongly suggests that the Applicant's assessment does not reflect the likely cumulative effects of Sea Link and Sizewell C. The considerations and evidence presented by SCC should therefore be reflected in this assessment. A similar sentiment applies to the Applicant's cumulative effects assessment of other projects such as EA1N and EA2 in addition to projects excluded from the assessment as set out previously in this chapter.</p> <p>11.200 The proposed project, in combination with Sizewell C, EA1N and EA2, will:</p> <p>i. result in a significant increase in HGV movements on the A12, potentially both to the north and south of Saxmundham.</p> <p>ii. exacerbate pre-existing issues along the A12 route.</p> <p>iii. result in SPR traffic from the south traveling through the four villages (Marlesford, Little Glemham, Stratford St Andrew and Farnham, with negative impacts on air quality, noise, severance, road safety, and congestion, especially the pinch point at Farnham bend where large loads manoeuvre very close to buildings.</p>	

Reference Matter		Point Raised	Applicant's Comments
		<p>iv. increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1069, B1122, B1121.</p> <p>v. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich.</p> <p>vi. increase HGV movements along the A12, reducing the attractiveness of the route for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route.</p> <p>vii. reduce the attractiveness of core strategic routes, such as the A12, due to delays and longer journey times causing local traffic to switch to minor, less suitable roads.</p> <p>viii. increase wear and deterioration of roads and structures due to the additional traffic.</p> <p>11.201 By comparison, table 13.31 of the inter-project cumulative effects assessment [APP-060] only assesses the cumulative effects of Sizewell C and Sea Link in terms of pedestrian severance and delay and fear and intimidation for a limited selection of receptors. This can partially be explained by the Applicant's limited study area which, SCC has argued, does not fully capture the impacts of the project. The evidence presented by SCC in this section strongly suggests that the Applicant's assessment does not reflect the likely cumulative effects of Sea Link and Sizewell C. The considerations and evidence presented by SCC should therefore be reflected in this assessment. A similar sentiment applies to the Applicant's cumulative effects assessment of other projects such as EA1N and EA2 in addition to projects excluded from the assessment as set out previously in this chapter.</p>	
11.202-11.204	Construction Negative Impacts - Successive Interproject Cumulative Impact	<p>11.202 The impacts on junction capacity and delay on the A12 in particular, have not been considered in Table 7.6 of 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport. By placing emphasis on delays on 2 or more arms of junction this automatically dismisses impact on through junctions where only one or two arms that give way to free-flowing major roads.</p> <p>11.203 Whilst at least some of the east coast NSIPs will be delivered at the same time with overlapping cumulative transport impacts there will also be a cumulative impact through repeated successive projects impacting on specific geographical areas.</p> <p>11.204 Examples would be:</p> <p>i. Long durations of construction traffic on local roads from successive projects (e.g. B1121, A1094, A12)</p> <p>ii. Repeated closures, traffic restrictions and diverted traffic (e.g. B1121, B1119)</p> <p>iii. Prolonged environmental impacts from construction traffic noise and vibration from successive 7-day week worked projects (e.g. Sea Link, Lion Link)</p> <p>iv. Disruption to Public Rights of Way network including repeated closure, diversion, or loss of amenity benefits.</p>	<p>The potential impacts on Driver Delay are considered to have been considered by the Applicant based on the sensitivity criteria within Table 7.6 of Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. To clarify, the sensitivity criteria is determined by the level of queuing experienced on at least one arm of a given junction. In the case outlined by SCC for through junctions, where only one or two arms give-way to free-flowing major roads, only one of these arms would need to experience a high level of queuing in order to be assigned a High level of sensitivity. The study area includes five A12 junctions which have either been assigned a Medium or Low level of sensitivity based on existing levels of queuing during the weekday peak hours, offering a robust approach. In two cases, a Medium level of sensitivity was assigned due to moderate queuing on just one arm of the junction, which demonstrates that whilst there would be no/ limited queuing on free-flowing arms, this has not resulted in sensitivity levels being underestimated, or queuing on certain arms being dismissed.</p> <p>In terms of cumulative impacts, the Applicant has undertaken inter-project cumulative traffic and transport effects assessment within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] with further explanation provided in Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]. This concludes that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term</p>

Reference Matter		Point Raised	Applicant's Comments
			temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in paragraph 1.27 of the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement).
11.205	Construction Negative Impacts – <i>Construction Traffic and Transport Conclusion</i>	<p>In summary, the proposed application will in the construction phase:</p> <ul style="list-style-type: none"> i. result in a significant increase in HGV movements on the A12 between Ipswich and Lowestoft, particularly when considered in combination with other concurrent NSIPs. ii. result in construction traffic traveling through the villages on the A12 (Marlesford, Little Glemham, Yoxford, Blythburgh, Wrentham) and settlements within East Suffolk (Snape, Friston, Benhall, Sternfield, Saxmundham, Kelsale, Aldeburgh, Leiston, Knodishall) with negative impacts on air quality, noise, severance, road safety and congestion. iii. increase HGV movements resulting in increased delay and reduced residual capacity on the A12, A1094, B1121, B1119, B1122 and B1069 iv. add to delays where predicted future growth scenarios indicate congestion will be significant, particularly in peak periods, most noticeably the A12 at Woodbridge and to the east of Ipswich. v. increase HGV movements along the A12, A1094, B1121, B1119, B1122 and B1069 reducing the attractiveness of the routes for users of sustainable transport, particularly cycling, as well as increasing severance in communities along the route. vi. increase wear and deterioration of roads and structures due to the additional traffic 	Responses to these comments have either been provided above, or previously within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).
11.206-11.212	Public Rights of Way	<p>11.206 There are potential impacts from construction traffic, construction activities, port traffic, abnormal indivisible loads, and upon PROW.</p> <p>11.207 The Council notes that the sequential construction of NSIPs on the east coast (i.e. EA1, EA3, EA1(N), EA2, Sizewell C and potentially Sea Link and LionLink) will impact communities on a recurring basis. This will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PROW users, in addition to local residents. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.</p> <p>11.208 Working hours covering 7 days a week could have a detrimental effect on the Public Rights of Way network, with peak usage at weekends, including bank holidays. Consideration should be given to the impact of these working hours on tourism for the area.</p> <p>11.209 In transport terms, the Council is not content with the inclusion of Sundays and Bank Holidays as working days. Such working practices would mean that communities would not have relief from construction traffic for the full duration of the project.</p>	<p>Responses to comments on inter-project cumulative effects and working hours have been provided above and previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p> <p>Regarding the intra-project cumulative assessment (Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]), the Applicant has agreed to provide further consideration to reporting of the intra-project cumulative effects which will be provided at a future examination deadline (9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]). It is recognised that intra project effects are very challenging to mitigate, but the Applicant is considering any action that could be taken.</p> <p>The Applicant recognises that frequent HGV movements across PROW have the potential to interact with route users and to compromise experience.</p> <p>As noted in the response and set out in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics Recreation and Tourism [REP1A-005], on the busiest day of the construction period up to 20 HGV movements per hour (ten arrivals and ten departures) can be expected on Bridleway 354/002/0,</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>11.210 The Applicant's intra-project cumulative effects assessment [APP-059] references significant effects on PRowWs, including 491/010/0, with no confirmed mitigation. SCC does not consider this to be acceptable. Appropriate mitigation should be secured for significant effects. If this cannot be achieved, then, following the mitigation hierarchy, appropriate compensatory measures should be undertaken.</p> <p>11.211 In Part 2 Suffolk Chapter 10 [APP-057], paragraphs 10.9.35, 10.9.56, 10.9.63, 10.9.69, 10.9.76, 10.9.79, 10.9.88, the Applicant states for several PRowWs, up to 20 HGV movements an hour to not be significant. This equates to approximately one every 3 minutes. SCC PRowW does not consider that this is not significant especially on bridleways, where horses, pedestrians and cyclists will be using the routes. The British Horse Society guidance on construction sites and horses (see Appendix 14) highlights horses' reactions to machinery and new things and supports SCC's concerns on the 20HGVs per hour on PRowWs, especially bridleways.</p> <p>11.212 In Part 2 Suffolk Chapter 10 [APP-057], paragraphs 10.9.87 – 10.9.90 claim the effect on Footpath 491/005/0 to only be minor adverse. SCC PRowW queries the minor adverse effect upon the PRowW when it is permanently diverted and permanently extinguished, lined with site fencing, has vehicle crossing points and has vehicles crossing every 3 minutes. The user experience will be changed greatly which is not captured by the classification of a minor adverse effect. The assessments of these footpaths should be reviewed and appropriate mitigation reflected in the PRowW Management Plan.</p>	<p>Footpath 354/007/A, Footpath 354/006/0, Footpath 260/017/0, Footpath 260/015/0, Bridleway 491/010/0. However, based on the average day across the programme, this flow reduces to an average of 38 HGV movements per day (19 arrivals and 19 departures), equivalent to up to four HGV movements per hour (two arrivals and two departures). On the busiest day, 20 HGV movements per hour (ten arrivals and ten departures) can be expected on Footpath 491/005/0. However, this reduces to an average of 68 HGV movements per day (34 arrivals and 34 departures), equivalent to up to eight HGV movements per hour (four arrivals and four departures) based on the average day across the programme when this access is in use.</p> <p>To manage and control HGV movements, site fencing and gates will be installed along the haul road which crosses the PRowW listed which will allow priority to be given to PRowW users at crossing points. PRowW users are anticipated to have uninterrupted use of the footpath, with the only exception being when a pedestrian reaches the gates and an HGV is already on the haul road crossing point. In this scenario, the PRowW will be closed briefly, and the user of the PRowW would be required to wait until the HGV crossing is complete and then the gates will reopen.</p> <p>In line with these site measures, users of the PRowW are anticipated to have uninterrupted journeys and will be given priority at the haul road crossing point. As a result, the route is unlikely to experience a material change in the level of usage compared to the baseline. Therefore no significant effects are anticipated, and no additional mitigation is required.</p>
11.213	Operation Phase Impacts	Operational phase traffic and transport effects are scoped out of the ES, but operational phase effects on Public Rights of Way are scoped in.	Noted, this allows the assessment to capture any potential permanent impacts to PRowW as a result of the Proposed Project during the operational phase and to identify any management/ mitigation which should be secured within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] to ensure that there is no potential for significant effects to arise on these PRowW as a result of the Proposed Project.
11.215	Operational Phase Impacts – <i>Neutral</i>	On the assumption that no major replacement works are required, no traffic and transport impacts are identified.	Noted.
11.216	Operational Phase Impacts –Negative	Permanent diversion of PRowW E-354/006/0 (S-P9) and PRowW E-491/005/0 (SP15) are expected.	Noted, this is identified within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] .
11.217	Decommissioning Phase Impacts	Decommissioning impacts have been predicted using the assessment of the construction phase.	Noted, this is as per the approach reported in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] .
11.220	Decommissioning Phase Impacts - <i>Negative</i>	There are potential impacts from decommissioning traffic, port traffic, abnormal indivisible loads, and upon PRowW.	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] does not identify the potential for significant effects to arise during the decommissioning phase from a Traffic and Transport perspective.

Reference	Matter	Point Raised	Applicant's Comments
11.221-11.249	Required Mitigation	<p>The Council considers that the proposals are inadequate in several ways as have been set out in this chapter. In relation to these problems, SCC considers that the application should be amended with appropriate mitigation measures to make it acceptable in highways terms. SCC's outstanding concerns from a traffic and transport perspective can be summarised as follows:</p> <ul style="list-style-type: none"> a) Proposed working hours give no respite to local community and highway network b) no provision for a planning obligation to cover the cost of necessary highways works. c) the assessment of structures to demonstrate a feasible route for abnormal loads is lacking. d) insufficient details have been provided to demonstrate how AILs will be able to pass over the Benhall Rail Bridge and what the impacts of these measures will be. e) Lack of mitigation within a number of communities adversely impacted by construction traffic f) Use of the B1121 and B1119 as construction routes when it was accepted in the EA1(N), EA2 and SZC examination that these routes are unsuitable. g) Absence of capacity assessments at specific junctions shown to experience significant delays h) Lack of cumulative impact assessment of traffic associated with NSIPs in East Suffolk that are likely to be delivered concurrently with Sea Link including impacts on the A12 between Ipswich and Lowestoft i) there are too many variables around other energy projects to make the assumptions reliable. j) Additional controls required in CTMP to ensure impacts do not exceed those assessed <p>Intra-project mitigation</p> <p>11.222 Specific locations for mitigation include:</p> <ul style="list-style-type: none"> i. B1121 Benhall: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety ii. B1121 Sternfield: Safety measures to reduce severance, fear and anxiety and improve road safety and protect buildings iii. B1121 Friston: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety iv. Saxmundham: Measures to reduce congestion at the B1119/B1121 junction and safety measures to reduce severance, fear and anxiety and improve road safety 	<p>Responses to the majority of these comments have either been provided above, or previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p> <p>The Applicant considers the committed mitigation proposed within the various Management Plans and Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043] to be sufficient for mitigating the potential impacts of the Proposed Project, including from a Traffic and Transport perspective. Nonetheless, the Applicant will review the Council's request for additional mitigation where this is not already proposed, to determine whether this is reasonable/ necessary to help further mitigate any potentially significant effects as a result of the Proposed Project.</p>

Reference Matter	Point Raised	Applicant's Comments
	<p>v. B1121 Kelsale/ Carlton: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety</p> <p>Inter-project mitigation</p> <p>vi. B1069 Knodishall: Improvements to footways, creation of cycleways and safe crossing points to reduce severance, fear and anxiety and improve road safety</p> <p>vii. A1094 Snape: Measures to reduce congestion at the B1119/B1121 junction and safety measures to reduce severance, fear and anxiety and improve road safety</p> <p>viii. A12 Safety improvements at B1119 Junction, Saxmundham, Bell Lane, Marlesford, Woodbridge Road, Bredfield</p> <p>Working Hours</p> <p>11.223 Requirement 7 Construction Hours [AS-087] are proposed to be 7 days a week. This will not allow a respite for local communities or the highway network.</p> <p>11.224 The Applicant proposes to limit HGV deliveries to six days excluding Sundays and bank holidays it is recommended that the wording be altered to HGV movements to clearly include trips that are not deliveries such as removal of spoil from site. The OCTMP para 7.4.15 [AS-008] indicates the applicant is expecting up to 30 HGV movements on Sundays or Bank Holidays which is not acceptable to the LHA. SCC considered that (4) of this requirement provides sufficient flexibility for the applicant so that this will not hinder construction.</p> <p>Benhall Railway Bridge</p> <p>11.225 As matters stand, SCC is not persuaded that the applicant has demonstrated that the use of the Benhall Railway Bridge is achievable (for the reasons set out above dealing with that structure). SCC therefore urges the applicant to further consider revisions to its proposals to provide an alternative access route, preferably utilising the SLR if available at the appropriate time or (if not) the B1122. Since such an alternative may well require changes to the Order limits and to the scope of the required Works, SCC considers that this is a matter that merits early consideration within the Examination, so that the Examining Authority can probe the issue and, as necessary, give an indication of how the Examining Authority would wish to see it addressed and resolved, potentially by the applicant making a change request. Clearly, the earlier that such matters are addressed, the more straight forward it would be to accommodate any changes within the timetable for the Examination.</p> <p>11.226 SCC considers that from a transport perspective the opportunity to provide a link road from SZC's SLR via Leston Airfield to link with the B1119 and hence a northern access to the SLR and Sea Link Converter Stations and</p>	

Reference Matter	Point Raised	Applicant's Comments
	<p>the Substation has not been effectively or adequately explored by the applicant</p> <p>11.227 SCC is seeking the development of an integrated access solution that provides for both the construction and operation of future, proposed and existing energy infrastructure. This solution must contend with the potential issues around the routeing of construction traffic, including AILs, on the B1119 to the effect that a route must be kept clear for emergency access to</p> <p>Sizewell B, which is a problem for current, proposed, and future projects (particularly given the ambition to extend SZB operational life to 2055). SCC identified issues around emergency access and planning in paragraphs 83 and 138 of its Relevant Representation.</p> <p>11.228 The Applicant has demonstrated its ability to coordinate with Lion Link with a long-term outlook in its coordination document [APP-363]. Therefore, SCC considers that such an approach should be applied to the issue of AIL access for both projects, with a resilient long-term solution implemented by Sea Link as the first of the two projects. This point is also relevant for future projects which will connect to the Kiln Lane substation with whom NGET will sign connection agreements and will need to deliver AILs of their own.</p> <p>11.229 As currently designed, this bridge would form critical infrastructure to deliver Sea Link and potentially Lion Link. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.</p> <p>Protection of the Local Highway Authorities Interest</p> <p>11.230 SCC considers it reasonable to claim reasonable costs for additional activities that result from this project and protect Suffolk ratepayers from absorbing these. This has process has in general been agreed for previous consented NSIPs albeit using differing mechanisms. Such costs include:</p> <ul style="list-style-type: none"> i. Approval and inspection of highway works ii. Reviewing management documents (CTMP) iii. Reviewing structural assessment of bridges to allow AIL movements iv. Review data associated with surveys to record structural deterioration of carriageway on construction haul routes and contribution towards maintenance v. Additional restricted hours working to avoid construction traffic or traffic regulations vi. Commuted sums for additional highway infrastructure adopted by the authority or temporarily maintained by the authority on behalf of the 	

Reference Matter	Point Raised	Applicant's Comments
	Applicant vii. Legal cost associated with highway agreements and adoption of highway.	
	Public Rights of Way mitigation and compensation	
11.231	The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRoW to be clearly interpreted by the public.	
11.232	The division of the effects of the development on PRoW across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRoW user, could then be significant, as recognised in the Planning Inspectorate's Advice Note 9.	
11.233	The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects. The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works.	
11.234	The Council would like to see a commitment to keeping PRoW open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals, and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRoW network, especially during the construction period.	
11.235	The Council is concerned that reductions applied to the proposed Order Limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation for diversions of public rights of way.	
11.236	For example, at the targeted consultation stage, a considerable amount of land was removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.	
11.237	The Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users ("NMUs").	

Reference Matter	Point Raised	Applicant's Comments
	11.238 Any alternative provided PRow must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for NMUs to access local facilities and employment.	
	11.239 Where mitigation cannot be achieved, the Applicant should contribute to PRow and green infrastructure improvements. Compensation sites could include contributions towards improved PRow routes between Saxmundham and Leiston, PRow links North-eastwards to the coast, southwards to Sternfield and enhancement to North Warren Nature Reserve. Along with the previously requested PRow immediately south of the B1119 for o road NMu's, a PRow along the haul road across the river Fromus, and Sluice Cottage to the old railway line. These will benefit users on grounds of safety for taking NUM's o of the carriageway, encourage walking and cycling for health and wellbeing and provide cycle routes for staff reducing vehicle trips.	
	11.240 The Council is disappointed that a considerable amount of land has been removed from the draft Order Limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and o er to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.	
	11.241 Suffolk County Council is concerned that, through minimising areas that are to be included within the DCO (removing most of the field south of the B1119), comprehensive landscape and visual mitigation, and PRow's for NMUs, commensurate with the proposals, is being made more difficult, if not impossible, to deliver. Therefore, SCC considers that compensation, at least to some degree, is possible and is worthwhile pursuing.	
	Converter Station Site	
	11.242 Saxmundham Footpaths 5 and 6 cross the site and require diversion.	
	11.243 SCC considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.	
	11.244 The strip of land along of the B1119 currently included in the proposed DCO limits, even considering the recent change request by the Applicant, does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, which also connect to other PRow in the area.	
	River Fromus Crossing	
	11.245 If the River Fromus Crossing is to be made permanent, SCC PRow considers that this route should be made a Public Right of Way to link East	

Reference	Matter	Point Raised	Applicant's Comments
		<p>Saxmundham to the Saxmundham Garden Neighbourhood and to link to the existing PRow network.</p> <p>11.246 The Council is also concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on the PRow network at times they are most frequently used.</p> <p>11.247 There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on Public Rights of Way. These include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PRow) alongside the Fromus crossing to link to the existing PRow network.</p> <p>11.248 The Council considers that the surfacing of E-103/006/0 from Sluice cottage at the beach to the old railway line should be considered for mitigation due to the disturbance and impact on amenity as set out in the following documents: Schedule 9(1)(b) '...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'. And Consideration of landscape and visual effects at both converter station sites, and possible mitigation including siting, planting & design approaches. From table 2 of the PINS Pre-Application Planning Services - Programme Document dated 2025 and 2.7 of the Project overview document dated October 2023 which states 'When undertaking works, we consider what practicable measures can be taken to enhance nearby and surrounding areas for the benefit of local communities and the natural and historic environment'.</p> <p>11.249 The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users, in addition to local residents and businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.</p>	
11.250	Comments on Application Documents	In what follows, SCC provides comments on relevant application documents including control documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.	Noted, SCC's comments are welcomed and will be considered by the Applicant.
11.251-11.257	Draft DCO – Pre-commencement works	<p>Clarity is requested of whether (n) 'temporary access' includes those shown on plans and listed in Schedule 9 or only refer to accesses strictly for the other activities listed under pre-commencement.</p> <p><i>Adoption of Permanent Works and Maintenance of Temporary Works</i></p> <p>11.252 Details of any permanent adoption for the alterations to streets listed in Schedule 6 Part 1 [AS-087] or any other highway works must be agreed in advance</p>	<p>Pre-commencement operations include all temporary accesses for the Proposed Project as listed within Schedule 9.</p> <p>Further detail of Access Point 14 (S-AP-14) as referenced on drawing DCO/S/DE/PS/1215 are provided on drawing DCO/S/DE/SS/1214 which demonstrates the permanent access and the overrun areas required for the AIL</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>with the highway authority. Commuted sums may apply. For example, the bellmouth shown in pink on plan DCO/S/DE/PS/1215 [APP-037] DCO/S/IGA/PS/1501 [APP038] would be far in excess of that considered reasonable by SCC for permanent adoption.</p> <p>11.253 Temporary works in Schedule 6 part 2 and Schedule 9 shall be maintained by Applicant contrary to article 18 [AS-087]. To expect the local highway authority to maintain temporary works from 12 months from completion in SCC's view is an unreasonable burden placed on the Suffolk ratepayers.</p> <p>11.254 Unclear whether any of the accesses to works listed in Schedule 9 should also be included</p> <p>11.255 Safeguards must be put in place to limit the duration of the temporary closure of streets [AS-087 Schedule 8 Part 1], particularly B roads so that these can be co-ordinated with other highway works.</p> <p><i>Traffic Regulation</i></p> <p>11.256 The powers under article 50 (6) of the DCO [AS-087] can last for up to 5 years. Particularly for B class roads this would be an unacceptable duration to restrict vehicular access (1) b, c and (2) e. The other powers such as restriction speed limit and prohibition of parking should also be used sparingly to avoid undue disruption.</p> <p>11.257 The Applicant should undertake sufficient consultation to satisfy the requirements of the Road Traffic Regulation Act 1984 (RTRA 1984) and the Traffic Management Act 2004 (TMA 2004). Experience from other projects suggests that the lack of consultation during the examination has been insufficient to give local residents, businesses, and road users the opportunity to comment or object to individual orders.</p>	<p>deliveries. These details have not changed since early engagement with SCC (Highways).</p> <p>Article 18 relates to the permanent alteration to layout listed in Schedule 6 Part 1 only.</p> <p>Closures would be agreed with SCC (Highways), the Applicant would seek to minimise the durations and impacts of any closures and the implementation of other restrictions as far as reasonably practicable to meet the needs of the project whilst limiting the impacts of the works.</p>
11.258-11.261	Draft DCO-Document 7.5.1.1: Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]	<p>Pre-construction activities as defined within the Order [AS-087] fall within the remit of the Outline Construction Traffic Management and Travel Plan ("OCTM&TP") and are therefore this document will need to be robust to manage these activities. The OCTM&TP in the Council's view lacks rigorous controls on HGV routing and details on the quantum of worker and HGV movements.</p> <p>11.259 In SCC's view that OCTMP lacks appropriate controls for construction vehicles, specifically caps to ensure that the assumed numbers and hence impacts are not exceeded. In reality. Nor is there a commitment than can be enforced in terms of workers shift patterns that form part of the embedded mitigation.</p> <p>11.260 It is unclear if the definition of 'workers' includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.</p> <p>11.261 In common with previous energy NSIPs SCC notes that the principal contractors have a significant role in managing construction traffic and workers. SCC's experience is that it is common to have a number of separate contractors undertaking different elements of the project, for example one constructing the convertor station and another the cable route. Therefore, it is important that the</p>	<p>Responses to these comments have previously been provided within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).</p>

Reference Matter		Point Raised	Applicant's Comments
		applicant retains ultimate responsibility for compliance with the management plans and co-ordinating the same.	
11.262-11.265	Draft DCO - Average Vehicle Occupancy	<p>The OCTMP paragraph 7.5.1 [AS-008] claims that an occupancy value of 1.5 is robust. No evidence is provided to support this. SCC's experience is that this target is difficult to achieve in practice.</p> <p>11.263 Network Peak and Construction Workers Peak</p> <p>11.264 This project, as with others, proposes workers shift changes at time outside the existing network peaks of 0800-0900 and 1700-1800. However, SCC is concerned that superimposing a number of projects shift changes may create a new network peak at these times or elongate the peak hours.</p> <p>11.265 SZC is undertaking periodic traffic surveys in East Suffolk which may assist in determining if the concern is valid.</p>	<p>Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS-008] includes measures to encourage construction workers to travel by alternative means to the single occupancy vehicle where possible. A Car Share Scheme will be implemented and managed by the Transport Co-ordinator, to match potential car sharers and to help staff identify any colleagues who could potentially be collected along their route to/from the Site. The car share database will be available to staff that have signed up, to allow them to identify their own potential matches. Car sharing staff will be given preferential parking provision as an incentive to reduce single occupancy (and therefore overall) car travel to the construction compounds. Therefore, it is considered that the occupancy value of 1.5 is achievable with these measures in place. It should also be highlighted that the assessment carried out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] offers a robust approach as it has been assumed that all staff would travel by car (rather than other modes). Therefore, the average vehicle occupancy factor of 1.5 construction workers per vehicle is considered to be robust on this basis.</p> <p>In addition to the above, Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS-008] includes an internal minibus service as a measure to transfer workers around the site and to reduce vehicle trips on the surrounding highway network. There would be the opportunity for this to also transfer construction workers to and from Saxmundham railway station, which is located a circa 1.2km walking distance to the north of the proposed site access (S-BM09) on the B1121 Main Road. This would both encourage and increase the viability of rail travel amongst construction workers, reducing vehicle trips on the surrounding highway network. Again, this demonstrates that the approach taken in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is robust, given that all staff have been assumed to travel by car as part of the assessment work.</p> <p>Responses to comments relating to new network peaks being created by multiple projects coming forward have previously been provided within Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]). The additional surveys being carried out by SZC are noted.</p>
11.266-11.267	Draft DCO-Definitions	<p>It is noted in the OCTMP [AS-008] that HGV's are classified as those commercial vehicles exceeding 3.5 tonnes which is coincident with other NSIPs.</p> <p>11.267 It is unclear what the definition of worker trips is and whether this includes administration staff and visitors who may travel in network peak hours. The definition of LGVs is also not clear.</p>	<p>Noted. The term "workers" primarily refers to construction personnel, where the working hours are clearly defined in the Requirement 7 of Schedule 3 of Application Document 3.1 draft Development Consent Order [EP1-036] and further set out in Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project [AS-018]. It is expected that all visitors to Site will be involved in construction in some way. Light Goods Vehicles (LGVs) are defined in Application Document 1.6 Glossaries and Acronyms [APP-006] as "<i>Cars and small vans <3.5 t gross vehicle weight</i>".</p>
11.268-11.270	Draft DCO – Management	<p>Table 7.1 gives roles and responsibilities for implementing the management plans including the OCTMP [AS-008]. SCC is concerned that similar projects have resulted in the appointment of a number of contractors for each element of the works, e.g. substation / convertor and onshore cabling. The measures in the CTMP</p>	<p>Noted. The Applicant will consider the Council's request to include these additional commitments within Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS-008], including with respect to caps on HGV movements.</p>

Reference	Matter	Point Raised	Applicant's Comments
	Structure and Reporting	<p>must ensure that the Applicant keeps overall control of the implementation and that monitoring is not fragmented across several elements of the works.</p> <p>11.269 The maximum two-way HGV movements presented in the Traffic and Transport assessment [APP-054] should be regarded as caps and not exceeded to demonstrate compliance with the table 5.2 of the OCTMP [AS008] including total daily movements and peak hour movements.</p> <p>11.270 Controls</p> <p>i. SCC would consider the appropriate controls reasonable:</p> <p>ii. HGV routes</p> <p>iii. HGV timing</p> <p>iv. Daily HGV cap</p> <p>v. Peak hour cap</p> <p>vi. With the following measured and reported:</p> <p>vii. Worker numbers</p> <p>viii. Worker car occupancy (or worker trips)</p>	
11.272-11.275	Draft DCO - Document 7.5.9.1: Outline Public Rights of Way Management Plan – Suffolk [APP352]	<p>Ex1.1.1: This is not acceptable as a method of considering the PRow and the Definitive Map should have been acquired from the definitive map team and correctly plotted. As incorrect assumptions on the definitive route, as opposed to assumed locations based on walked routes and desk top studies may lead to orders being invalid. This is repeated in section 2.4.1</p> <p>11.273 2.5.4 PRow falling into the Public Rights of Way: Temporary Stopped Up (closure) designation are those where short periods of closure are proposed. This could be, in practice, for a few hours on a given day. The designation is associated with works such as the installation of required fencing and/or providing PRow access controls where necessary, which is expected to involve marshals and gates to minimise risk for PRow users. Alternatively, this designation could relate to longer periods of closure throughout the construction phase due to construction compounds or haul roads. A Public Rights of Way: Temporary Diversion will be provided where a PRow needs to be temporarily stopped up for a few days/weeks/months, to ensure that there are no temporary closures without a temporary diversion route being in place. Do we assume that there may be a few days without a diversion in place? i.e. allowing a route in the Order Limits to be temporarily closed with no alternative route? How will this be managed?</p> <p>11.274 2.5.7 In terms of the operational phase, access to the HVDC alignment where this crosses beneath PRow E-103/006/0 and the approved King Charles III England Coast Path will be required by foot/quad bike for monitoring purposes. In addition, once the permanent access road for Friston Substation is operational, crossings with dropped kerbs will be installed across PRow E260/016/0 and E-260/017/0 to retain access to the HVDC alignment in this location. There is mention of use of a quad bike on the PRow footpath, is the path suitable for use of a motorised vehicle, if not then we recommend that footpath E-103/006/0 to be resurfaced for its length.</p>	<p>Public Rights of Way have been identified using the Suffolk Definitive Map and Statement of PRow from Suffolk County Council's own website (https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way) which is titled 'Definitive Map and Statement of public rights of way'. Whilst it is acknowledged that online copies of the maps are working copies of definitive maps, these are nonetheless understood to be the most recent versions available and that these should either be the same as, or more up to date than, the paper copies of the maps held by SCC. Therefore, if any information shown on SCC's online copies of the Definitive Map is incorrect, the Applicant would welcome SCC to advise accordingly.</p> <p>As identified in paragraph 2.5.4 and Table 5.1 of Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352], a temporary diversion will be provided when a PRow needs to be temporarily closed. There will be no closures without an alternative route being available. The only exception to this relates to the proposed temporary closure of the northern end of PRow E-137/026/0 when works are carried out on Benhall Bridge, given that the footway on south-eastern side of Benhall Bridge (which forms a connection with PRow E-137/026/0) would also be closed at this time. Further details of this are provided within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] and 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk (Version 2 - change request) [CR1-047] submitted as part of Change Request 1 at Deadline 1A. These closures would be short in duration.</p> <p>In terms of access during the operational phase, access across any PRow will either be carried out on foot or by quad bike for monitoring purposes. Therefore, if it not possible to access the HVDC alignment via quad bike (due to the unsuitability of existing surfacing for example), then access will alternatively be taken on foot. It is therefore not envisaged that any PRow resurfacing will be required, unless this is required by SCC.</p>

Reference Matter		Point Raised	Applicant's Comments
		11.275 No soil stockpiling or other preconstruction or construction activities to take place near, adjacent or on the PRow that may obstruct the PRow, or PRow diversion routes.	It is noted that PRow should not be obstructed. Necessary mitigation to retain access to and along PRow is set out in Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] , for agreement with SCC Highways and SCC PRow officers.
11.276-11280	Draft DCO - Document 6.2.2.13: Environmental Statement Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]	<p>The Council believes that there are inter-project effects that will impact on the PRow network and its users from more than just visual intrusion, but the lack of the single assessment approach for PRow, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRow network to the north of Friston, where there will be repeated temporary closures of PRow that could overlap with temporary closures on the same PRow required for the Sea Link project.</p> <p>11.277 Given that it is likely that the construction periods for Sea Link and Lion Link will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at Saxmundham and the substation at Friston for both Sea Link and Lion Link are laid at the same time will help to reduce the cumulative impacts on the local community and environment.</p> <p>11.278 Whilst at least some of the east coast NSIPs will be delivered at the same time with overlapping cumulative transport impacts there will also be a cumulative impact through repeated successive projects impacting on specific geographical areas.</p> <p>11.279 13.4.9 Traffic and Transport in terms of PRow closures and diversion, does not address mitigation or effects if the schemes cannot be co-ordinated. Moreover, the Applicant's coordination document [APP-363] does not address how PRow management will be coordinated with the EA1N and EA2 projects. Therefore, it cannot be assumed that there will be no significant cumulative effects. Other sections state that cumulative receptors will have a moderate effect, but if co-ordinated then it is minor. Provision should be included in the application for additional mitigation or compensation measures if the coordination claimed in this assessment does not come to fruition during delivery.</p> <p>11.280 Successive impacts of projects delivered one after the other are not mentioned and needs to be assessed if moderate or above such as in terms of disruption to Public Rights of Way network including repeated closures, diversions, or loss of amenity benefits.</p>	Responses to these comments have previously been provided within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]). To confirm, the Applicant has assessed inter-project cumulative traffic and transport effects, including with respect to PRow, within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] . Further details relating to overlapping cumulative transport impacts and successive impacts have been provided within Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110] .
11.281	Draft DCO - Document 7.5.3.1: CEMP Appendix A - Outline Code of Construction Practice [APP341]	The Council, including in its role as LHA, is not content with the inclusion of Sundays and Bank Holidays as working days, with justification that this is essential to delivery of the project ([APP-341] and dDCO Requirement 7). Such working practices would mean that communities would not have relief from construction traffic for the full duration of the project. Roads used for recreational purposes and the PRow network will be impacted at the times they are most frequently used as a result. Consideration should also be given to impact on tourism for the area.	Responses to comments on working hours have either been provided above, or previously within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]).

10. Applicant’s Comments on Chapter 12: Air Quality

10.1 Introduction

10.1.1 This section provides the Applicant’s comments on Chapter 12: Air Quality.

10.2 Comments Table

Table 10.1 Applicant’s Comments on Chapter 12: Air Quality

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
12.12-12.18	Construction Phase Impacts - Negative	<p>From a Public Health perspective there is no safe level of air pollution. Evidence shows both long-term exposure (over years) and short-term exposure (over hours) to low levels of air pollution can impact health with poor air quality linked to a range of conditions from asthma and lung cancer to heart disease and dementia. Further detail on this evidence can be found in Appendix 15. When referring to ‘low levels of air pollution’ the evidence relates to levels well below the statutory legal limits referenced in the Environmental Statement (Chapter 8: Air Quality [APP-055]). This is the reason the World Health Organisation has issued updated guidance (see Appendix 16) with recommended pollution levels up to 4 times lower than the statutory legal limits currently set in the UK to protect public health. Whilst SCC acknowledges that these guidelines aren’t statutory in the UK, they do evidence a shift in understanding around the levels at which air pollution can harm health and the growing body of evidence to support this.</p> <p>12.13 Air pollution disproportionately impacts people with pre-existing respiratory and cardiovascular conditions. Suffolk has a statistically significantly higher prevalence of COPD and asthma in many of its districts than the England average and that includes in East Suffolk (Asthma prevalence in East Suffolk is 7.8% compared to an England average of 6.5%; COPD prevalence in East Suffolk is 2.5% compared to an England average of 1.8%). The impacts on vulnerable Suffolk residents, and on the health and care system, are being seen in Suffolk hospitals, particularly though the increased admissions for respiratory conditions in the winter months49.</p> <p>12.14 The air pollution levels resulting from the Sea Link Proposal have been concluded in the Environmental Statement (Chapter 8: Air Quality [APP-055]) to be ‘Not Significant’ throughout the construction phase and whilst SCC are satisfied with the mitigations proposed, which include air quality monitoring, there is a lack of clarity at this stage relating to construction transport routes and the subsequent impacts on the wider transport network (which will have an impact on local air quality).</p> <p>12.15 Public Health also have concerns regarding the proposed working hours which offer little respite from project emissions for local communities. This concern becomes more significant when the cumulative impacts from the other developments in the area are taken into consideration.</p>	<p>The evidence regarding the health impacts of both long- and short-term exposure to air pollution, even at levels below current statutory limits, is acknowledged.</p> <p>As detailed in Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055], detailed modelling was undertaken at worst case receptor locations along the A12. Changes in nitrogen dioxide (NO₂), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 10 microns in diameter (PM_{2.5}) concentrations at these locations as a result of the Proposed Project were predicted to be negligible in accordance with the IAQM and EPUK Development Control guidance, with the largest change in NO₂ and PM₁₀ being 0.2µg/m³ (largest change in PM_{2.5} concentrations was 0.1µg/m³). The largest construction traffic flows are predicted on the A12, therefore changes in concentrations elsewhere along the other construction traffic routes would be smaller. Furthermore, these changes are temporary, and are based on peak construction traffic flows. As such, construction vehicle emissions as a result of the Proposed Project have been determined as negligible (not significant).</p> <p>The Proposed Project must ensure compliance with current UK legislation. The relevant legal frameworks establishing the pollutants to be assessed, associated thresholds, and averaging periods are set out in the Air Quality (England) Regulations 2000, the Air Quality Standards Regulations (AQSR) 2010, and, for PM_{2.5}, the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023. The Government recently responded to the Office for Environmental Protection (OEP) regarding the adoption of World Health Organisation (WHO) air quality guidelines. In its response, the Government clarified that WHO guidelines are intended to inform the development of air quality standards, rather than serve as ready-made targets for direct adoption, as they do not take into account achievability or country-specific circumstances. The Government confirmed that WHO guidelines, alongside standards adopted by other countries, will be considered as part of an evidence-led process should changes or updates to future long-term targets be required. Accordingly, the air quality assessment for the Proposed Project has been carried out in accordance with the current legal</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>12.16 The Environmental Statement (Chapter 13: Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) reviews the cumulative impacts from twenty-five projects happening in a similar timeframe and location to that of the Sea Link Project. The review concludes that there are unlikely to be significant cumulative effects on health and wellbeing, as a result of there being no significant cumulative effects identified for traffic and transport or air quality (Environmental Statement Chapter 7: Traffic and Transport [APP-054] and Chapter 8: Air Quality [APP-055]).</p> <p>12.17 This view however is not supported by Public Health. In the Environmental Statement (Chapter 13: Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]) it is stated 'Vehicles associated with the Sizewell C main development site share the same routes as vehicles associated with the construction of the Proposed Sealink Project, such as the A12. However, as the Proposed Project only has negligible effects, cumulative effects are not likely to occur.' From a Public Health perspective, SCC does not agree with this rationale. An increase in vehicles on the road will lead to increased Nitrogen Dioxide (NO2) and Particulate Matter (PM2.5 and 10) and even at low levels the evidence suggests it can still have an impact on health, and these impacts should not be dismissed.</p> <p>12.18 There are a number of mitigations set out in the Outline Air Quality Management Plan [AS-129] which will see air pollution managed and monitored. These mitigations will reduce but not eliminate emissions, and as such, the overall effect on local residents, visitors, and businesses during the construction period, particularly in combination with other NSIPs happening concurrently, is expected to remain adverse.</p>	<p>requirements and relevant guidance, ensuring that all statutory obligations are met.</p> <p>Several measures have been proposed to minimise emissions including GG12, AQ04, AQ09, as outlined in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]. Measures including encouraging the construction staff to use sustainable transport and monitoring HGV movements and compliance with HGV routes are also included in Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008].</p> <p>Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142] identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding the Proposed Project. This is based on the peak construction traffic flows reported or estimated for each cumulative scheme and assumes that these would all overlap. These estimates are therefore overly worst-case. Predicted concentrations for receptor locations using the cumulative flows are presented in Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123]. Whilst the cumulative traffic data is based on an unlikely worst case, all predicted concentrations are still well below their respective air quality thresholds.</p> <p>A response to the comment regarding working hours can be found in Table 2.11 of Application Document 9.34.1: Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>
12.20-12.23	Operation Phase Impacts – Neutral	<p>There is a small possibility of increased air pollution arising from emissions from staff travel for inspection, maintenance, and repairs during the operational phase in addition to emissions from the substation and converter station back-up generator.</p> <p>12.21 These could impact on the health and well-being of nearby communities particularly those more at risk from the health impacts of poor air quality. However, travel is predicted to be infrequent (Environmental Statement, Chapter 8, Air Quality) and there are no human or ecological receptors within 200m of the backup generators.</p> <p>12.22 Minimal air quality impacts are therefore expected in the operational phase assuming no major work is required and therefore the impacts are deemed Neutral.</p> <p>12.23 Should major work be required it is vital that appropriate mitigations are put in place and approved by the relevant authorities to ensure minimal impact on local communities.</p>	This comment is noted.
12.27-12.28	Decommissioning Phase Impacts - Negative	<p>According to the Environmental Statement (Chapter 8, Page 45, Air Quality) likely impacts from decommissioning are similar to the construction phase and could impact air quality through:</p> <ul style="list-style-type: none"> • Dust from decommissioning works • Decommissioning vehicle emissions • Non-Road Mobile Machinery emissions 	Please see comments above relating to the construction phase.

Reference	Matter	Point Raised	Applicant's Comments
		<ul style="list-style-type: none">These emissions have the potential to impact on the health and well-being of nearby communities, particularly those more at risk from the health impacts of poor air quality. <p>12.28 Further details are required relating to the decommissioning phase for Public Health to be able to effectively assess the impacts and the required mitigations, however if the assumption being made is that they are similar to the construction phase then our points relating to impacts in the construction phase (above) are relevant here. The health and wellbeing of local people is paramount, and mitigations need to ensure that impacts are minimised.</p>	
12.29-12.35	Required Mitigation	<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>12.30 Whilst individual reports on individual projects may conclude impacts to be 'negligible' or 'not significant' Public Health have concerns that the number of concurrent NSIPs and other major developments taking place in the same locality and temporal space will place notable pressure on the health and wellbeing of local communities through the increased traffic and air pollution with little respite.</p> <p>12.31 Whilst it is acknowledged that appropriate mitigations are proposed and pollutant levels are not expected to exceed Statutory Limits it is important to recognise that there is a growing body of evidence suggesting these Statutory Limits are not enough to protect health and SCC would therefore like to see an emphasis on bringing air pollution levels down as low as possible for the health and wellbeing of our residents.</p> <p>12.32 SCC expects to see the delivery and monitoring of the mitigations and their effectiveness as set out in the following plans:</p> <ul style="list-style-type: none">Construction Traffic Management and Travel PlanConstruction Environmental Management Plan <p>12.33 Including the following which are secured by Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order:</p> <p>'Avoiding the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable; Ensuring all equipment complies with the appropriate Non-Road Mobile Machinery standards; Using stage 4 NRMM as a minimum and stage 5 where possible additionally, where possible, use alternative / renewable energy to power NRMM; and any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, to be located away from sensitive receptors such as residential properties or ecological sites where practicable'.</p> <p>12.34 In relation to the siting of equipment or activity that may produce nuisance such as dust SCC would expect a firmer commitment that these will take place away from sensitive receptors and would require advanced notice and information should this not be the case.</p> <ul style="list-style-type: none">Code of Construction Practice	<p>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129] includes commitments to monitor and log mitigation measures and their effectiveness. The Plan will be updated at a later deadline to include a requirement for the site log to include a list of NRMM being used, with confirmation that they all meet Stage IV/V emissions.</p> <p>Commitment GG10 ensures that, where practicable, equipment and activities will be located away from sensitive receptors. This approach allows for site-specific constraints and operational requirements, while prioritising the minimisation of potential impacts. Where it is not practicable to avoid proximity to sensitive receptors, appropriate mitigation measures will be implemented to minimise any potential nuisance. Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129] will be updated at a later deadline to include a requirement to provide stakeholders with advanced notice and relevant information when it is not practicable to avoid siting such equipment or activities near sensitive receptors, including justification and details of proposed mitigation.</p> <p>A response to the comment regarding working hours can be found in Table 2.11 of Application Document 9.34.1: Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Mitigation measures set out in this plan are from the Institute of Air Quality Management best practice construction dust guidance.</p> <ul style="list-style-type: none">• Outline Air Quality Management Plan <p>This sets out a commitment for air pollution monitoring to take place before and during the construction process. This is welcomed and SCC considers the plan suitable; it will enable the identification of pollution hotspots where interventions to reduce pollution levels will be required should any exceeding or trigger thresholds be exceeded.</p> <ul style="list-style-type: none">• Detailed Decommissioning Traffic Management and Travel Plan is required• Detailed Decommissioning Environmental Management Plan is required <p>12.35 In line with other mitigations proposed in this report (Health and Wellbeing, Traffic and Transport, Noise and Vibration chapters), SCC would encourage the working hours to be reconsidered to offer local communities' respite from potential emissions (regardless of the level of emissions).</p>	

11. Applicant’s Comments on Chapter 13: Socioeconomics, Recreation and Tourism

11.1 Introduction

11.1.1 This section provides the Applicant’s comments on Chapter 13: Socioeconomics, Recreation and Tourism.

11.2 Comments Table

Table 11.1 Applicant’s Comments on Chapter 13: Socioeconomics, Recreation and Tourism

Reference Matter		Point Raised	Applicant’s Comments
Local Impact Assessment			
13.20	Local Impact Assessment – Context	Suffolk has specific natural and geographic advantages which make it very attractive for locating low carbon energy generation and the subsequent connection projects. Suffolk has established industries, nuclear, onshore gas logistics and agri-tech, as well as climatic conditions, which make it attractive for specific low carbon technologies, especially new nuclear, solar power, hydrogen production, and anaerobic digestion. The delivery of Net Zero in the UK by 2050 is expected to require a pipeline of generation and connection projects in Suffolk. Therefore, significant changes for the economy, environment and communities of Suffolk can be expected as a result. Suffolk and the wider East of England has a unique blend of infrastructure, expertise, skills, and innovation. At the same time, hosting so many low carbon generation and connection projects presents a number of challenges, in terms of impacts on the tourism economy, local businesses and the labour market.	A response to this comment regarding cumulative effects, in particular on tourism, can be found in Table 2.1 (Reference <i>Cumulative effects</i>) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
13.21-13.23	Construction Phase Impacts - Positive	<p><i>Supply Chain and Economic Development</i></p> <p>13.21 While the overall impact of the proposal on supply chain and economic development is considered by the Council as neutral, the Council accepts that the construction of the Sea Link grid reinforcement project could have some minor positive impacts on the local supply chain through investment in local businesses to support delivery of the installation of the project. However, given the relatively short construction period of the project, the benefits on the local supply chain are not expected to have a long-term impact unless consideration is given to the wider network projects and how local supply chain can support all of these. There are, in addition to Sea Link, further grid reinforcement and interconnector projects in planning that are expected to be constructed prior to 2030. Therefore, a developed local supply chain with experience in the construction of these installations can expand to take advantage of these projects and be in a position to export their expertise to similar large-scale project opportunities nationally.</p> <p>13.22 Unless reinforced through proactive local procurement, workforce accommodation planning, and coordination with local service providers. While the Sea Link project is likely to generate some indirect (supply chain related) and induced (spending-related) employment during the construction phase, these impacts will be di use and largely dependent on the degree of local economic integration—something currently unaddressed in the application.</p>	<p>The Applicant is keen to work collaboratively with the Council. The Applicant will, in collaboration with its main works contractors, develop and implement a Social Value strategy. As the Proposed Project develops, the detail of the approach can be shared and discussed with a view to benefit the local economy.</p> <p>As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.</p> <p>The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C’s ‘College on the Coast’, to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner.</p>

Reference Matter		Point Raised	Applicant's Comments
		13.23 Suffolk's economic base — especially in rural towns like Saxmundham, Leiston, and Aldeburgh — is made up of mostly small, service-oriented businesses that could benefit from short-term construction activity, particularly if accommodation is sourced locally and worker spend is retained within the community. However, without intervention, these opportunities tend to be minimal and transient and are often captured by larger regional or national suppliers.	
13.24-13.26		13.24 Sea Link's ES applies a multiplier of 1.5 to model indirect and induced impacts, but does not define the geography of this benefit, nor propose measures to localise it. The assumed 70% non-local workforce further limits the likely scale of induced effects in East Suffolk.	<p>Table 10.5 of Application Document 6.2.2.10 (B) Part 2, Suffolk Chapter 10: Socio-economics, Recreation and Tourism [REP1A-005], sets out and justifies the additionality assumptions used in assessing net additional employment and Gross Value Added (GVA), in line with the MHCLG Appraisal Guide. A multiplier of 1.5 and a 50% displacement rate have been applied to the calculation of net additional employment both within and outside the 60-minute drive-time area. A 70% leakage rate has been used in calculating both employment and GVA generation.</p> <p>Table 10.23 presents the temporary annual employment generated by the Suffolk Onshore Scheme, incorporating the effects of leakage, displacement and the multiplier.</p> <p>Further response to this comment can be seen in the row above.</p>
		<p>13.25 However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk, including the relevant local authorities. This will assist in the development of programmes that will support local businesses to grow and offer their services to supply the Applicant's project and other related projects within and outside the region. As this project is one of a series of projects being brought forward by National Grid in the locality, there is a far greater opportunity than a single project would present. To ensure these opportunities are realised, the Applicant's commitments should be detailed in a Skills and Employment Plan secured by a DCO requirement or Section 106 agreement.</p> <p>13.26 Although the Council considers that there could be a minor positive impact caused by additional spend by a non-homebased workforce, the Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally</p>	
13.27-13.31	Construction Phase Impacts - Neutral	<p><i>Supply Chain and Economic Development</i></p> <p>There will be a neutral impact on supporting and enhancing Suffolk's skills infrastructure and training offer, moving to positive if structured investment and governance is secured. Sea Link presents an opportunity to enhance Suffolk's existing skills ecosystem, but this potential will only be realised through proactive alignment with Suffolk's established skills infrastructure, strategic interventions, and legacy-focused investment. Without such commitments, the project risks increasing pressure on training providers already servicing multiple NSIPs.</p> <p>13.28 Suffolk is home to a growing infrastructure ecosystem i.e. engineering and construction. Investments such as the East Coast College Lound Facility, the Sizewell C ASEC Fund, and the SCC's Regional Skills Coordination Function (RSCF) are building capacity to enable Suffolk's economic development. Sea Link intersects this momentum but has not (based on the Environmental Statement) offered tangible and proportionate contributions to skills development, nor proposed integration with existing initiatives.</p> <p>13.29 As Suffolk prepares for overlapping construction peaks from Sizewell C, EA1N/2, LionLink, and other projects, the Sea Link promoter has a critical role to play in ensuring that the skills infrastructure keeps pace with demand and that its investment delivers a long-term legacy beyond the temporary construction period.</p> <p>13.30 SCC's Supplementary Guidance clearly states:</p> <p>13.31 "Contributions should be sought to enhance the long-term capability of Suffolk's education and training infrastructure as part of delivering a long-term legacy for the region."</p>	A response to this comment regarding skills, training and employment can be found in Table 2.11 (References 119-120) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]

Reference Matter		Point Raised	Applicant's Comments
13.32	Construction Phase Impacts - Negative	<p><i>Supply Chain and Economic Development</i></p> <p>The Council considers there is a likely negative impact on workforce availability to regional businesses and supply chain due to workforce displacement and churn. Within the region, there are numerous energy infrastructure projects planned and expected to be in construction around the same period as the Applicant's development. These projects would likely require some of the skills and workforce needed for the construction of this project.</p>	A response to this comment regarding employment displacement and churn can be found in Table 2.11 (Reference 116) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
13.33-13.38	<p><i>Employment, Skills, and Education</i></p> <p>Construction Phase Impacts - Positive</p>	<p><i>Employment, Skills, and Education</i></p> <p>The Council anticipates potential positive employment, skills, and education impacts through collaboration with the Applicant. However, the Applicant expects a large proportion of the additional jobs created to be taken by those outside of the study area. The Council considers this to be unacceptable and expects the Applicant to develop a comprehensive Skills and Employment Plan, and to engage with the Regional Skills Coordination Function at the Council to address this.</p> <p>13.34 There are opportunities for some positive employment, skills, and education impacts, in terms of employment levels and reducing inequalities by creating opportunities for those furthest from the workforce and for vulnerable groups. To achieve such positive impacts, the Applicant would need to identify the different skills required across their total workforce, and then the propensity and flexibility of the labour market within the 60-minute travel study area to fill these identified roles. In parallel, the Applicant would also need to identify local supply chain companies that can become involved in the project.</p> <p>13.35 To achieve this positive impact, the Applicant needs to work collaboratively with local stakeholders, share detailed skills and job information in advance, and provide funding for several interventions that will ensure a pipeline of local people can be trained and enter the labour market at the right time with the right skills to take up opportunities that the scheme will provide. This should be detailed within a Skills and Employment Plan, via the DCO.</p> <p>13.36 The Council considers that the Applicant needs to work with their associated supply chains, contractors and local partners to recruit and train local people ahead of the construction period which will ensure that they develop their skills and are enabled to move between roles and different types of contracts as we see a range of energy infrastructure projects in the region. The project, as part of the wider energy infrastructure construction projects, is an opportunity to generate skills and employment outcomes and subsequently contribute to the achievement of both national and local policy objectives. This includes:</p> <p>i. Providing new, additional employment opportunities for all (as required within EN-1, paragraph 5.13.4), but especially those who are currently unemployed or underemployed, thereby reducing in-work poverty and inequality which has risen sharply in the region.</p> <p>ii. Increasing skills attainment levels for school leavers and those in work through using net zero/clean growth as a catalyst to motivate the workforce to seek, and take advantage of, opportunities for professional development (in alignment with EN-1, paragraph 5.13.11).</p> <p>iii. Driving inclusive regional growth, reducing regional inequalities, and boosting local prosperity - by boosting productivity, pay, jobs and living standards</p>	A response to this comment regarding skills training and employment can be found in Table 2.11 (References 119-120) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]

Reference	Matter	Point Raised	Applicant's Comments
		<p>by growing the local supply chain in sustainable industries (as described in EN-1, paragraph 5.13.4).</p> <p>13.37 In order to achieve these outcomes, the Council expects the Applicant to work with local partners to:</p> <ul style="list-style-type: none"> i. Embed social value in their associated supply chain, delivering change for local people around jobs, sustainability, health and well-being, inclusivity, and equity. ii. Raise career aspiration through the creation of sustainable and progressive employment opportunities and contribute to a further enhanced integrated careers and advice system which connects and inspires young people into training for the careers available locally utilising local initiatives iii. Be an advocate for a diverse, dynamic, and inclusive workforce iv. Wherever possible, align, utilise, and actively promote existing and integrated skills resources available in both counties, enhancing and enriching the local offer for all. <p>13.38 The benefits of apprenticeships for both an employer and apprentice are widely publicised. The project will provide many opportunities for local apprenticeship recruitment supporting regional growth sectors of construction and engineering and play an important part in mitigating any negative employment churn impacts in wider regional employment sectors.</p>	
13.39	<i>Employment, Skills, and Education Construction Phase Impacts - Neutral</i>	<p>The Council considers that there will be only negligible positive impacts because of indirect and induced employment opportunities, particularly due to the linear nature of the project. However, there is the potential for a positive impact to be created if there is sufficient and early supply chain engagement.</p>	<p>A response to this comment regarding stakeholder engagement can be found in Table 2.11 (References 112-114) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>
13.40-13.50	<i>Employment, Skills, and Education Construction Phase Impacts - Negative</i>	<p>13.40 The Council considers there is a likely negative impact on workforce availability to regional businesses due to workforce displacement and churn.</p> <p>13.41 Labour market churn occurs as workers move between jobs. While the Council welcomes, in principle, opportunities for individuals to access jobs with better pay and enhanced career paths, in this case the Council considers labour market churn will have a damaging negative impact on the local economy. Given the relatively short construction period of this proposal combined with the fact there are limited long-term operational roles, any employment churn, where skilled labour prematurely leaves their current local employment to work on the project, will have a damaging negative impact on the local economy.</p> <p>13.42 If proactive and well-structured local employment strategies are adopted in partnership with the Council. Without targeted interventions, the actual employment benefit to Suffolk residents is likely to be minor due to workforce competition, high leakage, and a limited skills pipeline for specialised trades.</p> <p>13.43 Sea Link's construction phase in Suffolk is expected to require an average of 86 full-time equivalent (FTE) workers annually, peaking at 327 FTEs for one day in 2028. However, based on the Environmental Statement's assumptions:</p> <ul style="list-style-type: none"> i. Only 30% of the workforce is expected to be home-based. ii. No specific employment or apprenticeship targets are proposed. iii. No outreach or intervention plans to increase local labour participation are included. <p>13.44 Suffolk has the foundations for a stronger local construction workforce offer. It benefits from:</p>	<p>A response to this comment regarding workforce churn, and skills, training and employment can be found in Table 2.11 (Reference 116) and (References 117-118) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>

Reference Matter	Point Raised	Applicant's Comments
	<p>i. A growing energy and infrastructure training ecosystem (e.g. East Coast College, Suffolk New College, and the Energy Skills Centre).</p> <p>ii. A well-established Regional Skills Coordination Function (RSCF) mandated through Sizewell C.</p> <p>iii. Known gaps in certain skill areas (e.g. civils, M&E, logistics) which require proactive pipeline development.</p> <p>13.45 In a region facing cumulative NSIP demand, passive assumptions of local employment delivery are insufficient. SCC's Supplementary Guidance clearly states that:</p> <p>13.46 "Employment should always be referred to as an opportunity. It cannot be assumed that just because there is an opportunity that this will result in employment happening."</p> <p>13.47 There are a significant number of NSIPs in East Suffolk that will be requiring similar skilled workers at the same time, and the construction period for Sea Link is predicted to coincide with that of Sizewell C Nuclear Power Station. This is likely to put pressure on the available workforce, potentially reducing opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.</p> <p>13.48 The cumulative impact assessment (tables 13.33 and 13.43 of [APP-060]) concludes effects are not significant and states that labour capacity is sufficient to accommodate cumulative workforce demand, largely because the Sea Link workforce is small compared to Sizewell C. However, this conclusion does not fully address the risk of concurrent demand for specialist skills, nor does it explain how this finding was reached. Evidence from regional skills reports and NSIP labour forecasts suggests this assumption is flawed, as competition for roles such as electrical engineers, civil engineers, and welders is likely to be intense. The Applicant should confirm that current workforce data has been used in assessing worst-case scenarios, particularly given that Sizewell C's sister project, Hinkley Point C, has increased its peak workforce numbers since the Environmental Statement was completed. In assessing cumulative impact, the magnitude of Sizewell C has not been properly factored in, only the magnitude of Sea Link itself. If the impact of Sizewell C is significant, then the addition of further projects such as Sea Link will exacerbate these effects.</p> <p>13.49 In addition to workforce pressures, cumulative impacts on local businesses and supply chains require closer assessment. High levels of workforce churn and displacement could negatively impact SMEs, as skilled staff are drawn away to NSIP contractors offering higher wages, an issue that local businesses are already reporting to feel the effects of. This risk is compounded by overlapping project timelines, which may limit the ability of local firms to compete for contracts or retain experienced staff. The Environmental Statement does not quantify these indirect effects and does not propose specific mitigation beyond generic commitments. The Council expects the Applicant to model these risks and embed clear measures, such as supply chain engagement strategies and contractual social value requirements, within a Skills and Employment Plan secured through a control document.</p>	

Reference Matter		Point Raised	Applicant's Comments
		13.50 The Council therefore requires the Applicant to undertake detailed scenario-based workforce modelling to accurately assess cumulative effects and ensure robustness. This modelling should clearly show total workforce numbers and timings, rather than stating FTEs across the project, to accurately reflect the situation. These measures should be embedded in a comprehensive Skills and Employment Plan and secured through an appropriate control document, in line with EN-1 Paragraphs 5.13.4 and 5.13.11, which require Applicants to consider socio-economic impacts, cumulative effects, and provide positive provisions to mitigate impacts and deliver legacy benefits.	
13.51	Construction Phase Impacts – Tourism - Positive	13.51 There may be some short-medium term benefits for accommodation providers due to workforce business, particularly if the scheduling of works allows workers' utilisation of accommodation to complement the tourist season.	<p>This comment has been noted.</p> <p>A response to this comment regarding impacts on local visitor and tourist accommodation can be found in Table 7.13 (Reference 7.13.7) of Application Document 9.34.6 Applicant's Thematic Responses to Relevant Representations [REP1- 116].</p>
13.53-13.59	Construction Phase Impacts – Tourism - Negative	<p>13.53 Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SECHNL and Heritage Coast.</p> <p>13.54 Construction of this project is likely to have an impact on the tourism business within 500 meters of the red line boundary and up to 2km of the red line boundary, particularly, but not solely, within the SECHNL. Furthermore, indirect impacts of construction on perception of these areas and consequent perception to visit them is likely to occur, and this issue is exacerbated by core working hours for construction including 7am – 5pm on Sundays and Bank Holidays due to the impacts on the PRoW network and roads used for recreational purposes at times they are most frequently used. Businesses, services, and attractions based on day visitors are likely to be the most sensitive.</p> <p>13.55 There is the potential for construction workers to displace tourists from accommodation. This would result in reduced tourist numbers visiting the area, potentially negatively impacting local tourist businesses. Reliance of the accommodation sector on construction workforce bookings could lead to a “boom and bust” effect.</p> <p>13.56 The potential for adverse impacts on tourist accommodation is exacerbated by the presence of several major infrastructure projects to be constructed at the same time such as Sizewell C, EA1N, EA2 and likely Lion Link. Table 13.33 of the cumulative effects assessment [APP-060] states that effects on Local Accommodation Capacity are Not Significant. The assessment arguably underestimates the potential effects and need for mitigation. The tourism accommodation sector in this area is not large and projects such as this have the potential to offer short-term gain at the expense of longer-term loss of business which could occur.</p> <p>13.57 The effects from severance on roads has the potential to cause significant disruption to the tourism industry as there will undoubtedly be crossover with other NSIPs. Sizewell is the most high-profile, but it is far from the only one. It has the potential to cause short-medium term disruption as there could be a perception issue where Suffolk could be seen as a less visitor friendly place if beset by diversions and delays. More consideration needs to be given to their effects and proposed mitigation measures</p> <p>13.58 Table 13.43 of [APP-060] seems to downplay the significant cumulative effects on the area, the draw on workforce and on the available tourism</p>	<p>A response to this comment regarding tourism impacts can be found in Table 7.13 (Reference 7.13.1) of Application Document 9.34.6 Applicant's Thematic Responses to Relevant Representations [REP1- 116].</p> <p>A response to this comment regarding impacts on local visitor and tourist accommodation and construction working hours can be found in Table 2.11 (References 127-128) of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>Additionally, the Applicant acknowledges the importance of the local tourism economy and the concerns raised by SCC regarding potential cumulative impacts from multiple Nationally Significant Infrastructure Projects. To address concerns, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] of the Environmental Statement assesses the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. The assessment of inter-project cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socio-economic, recreation and tourism receptors. Impacts on residential receptors, business premises, community facilities, visitor attractions, development land, PRoW and recreational routes are assessed within a 500 m Study Area from the Proposed Project's RLB. Impacts on employment generation, GVA, tourist accommodation, local labour supply and social infrastructure were assessed within a 60-minute drive time of the Suffolk Onshore Scheme. The chapter concludes that no significant effects are expected when considering the impacts of the inter-project cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant remains committed to minimising disruption and has proposed a series of embedded measures set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], such as GG27 commits to keeping members of the community and local businesses informed regularly of works through active community liaison.</p> <p>The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>accommodation which could occur courtesy of Sea link and other NSIPs. This needs to be re-examined and mitigation measures considered.</p> <p>13.59 It is important that social, community and tourism impacts are not considered as a whole. Whilst all could potentially be impacted by projects such as this (both positively and negatively), the visitor economy is vulnerable to a number of economic and perception issues which could experience long-term disruption from projects such as these, unless mitigation measures are considered.</p>	<p>facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in Application Document 7.10 Coordination Document [APP-363] and cumulative traffic impacts are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of Sea Link in combination with other projects.</p>
13.61-13.63	Operational Phase Impacts – Employment, Skills and Education - Neutral	<p>13.61 The Applicant scoped out operational employment from the EIA due to limited numbers. However, the Council considers that, in combination with other projects in the region under construction at the same time as Sea Link, the number of potential operational employment opportunities is sufficient to be scoped into the Assessment.</p> <p>13.62 Negligible (Potentially Under-Assessed) – Sea Link is likely to generate a small number of operational roles, particularly in maintenance, inspections, and long-term asset management. However, the Environmental Statement has scoped operational employment impacts out of the assessment - despite the Council's view that these effects are relevant, especially when considered cumulatively with other NSIPs and the need to support long-term economic resilience in the local area.</p> <p>13.63 The project is part of a growing cluster of energy assets—including Sizewell B and C, EA1N/2 substations, and LionLink—which collectively require a skilled operational and maintenance workforce. It is therefore short-sighted to treat operational employment in isolation and dismiss its cumulative regional importance.</p>	<p>A response to this comment regarding operational employment can be found in Table 2.11 (References 122) of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
13.66	Operation Phase Impacts – Tourism - Neutral	<p>13.66 Underground cable sections of the route would overtime meld into the landscape.</p>	<p>The Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) provides an assessment of the effects of the underground cable sections of the Proposed Project post construction on landscape character and visual amenity. As noted in the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]), the Suffolk Onshore Scheme has been designed to avoid the temporary or permanent loss of notable habitats, as far as is practicable and will be constructed predominantly within arable habitats. It is considered that areas of agricultural land would be restored quickly, whereas the reinstatement of other features such hedgerow and acid grassland would take comparatively longer to re-establish.</p> <p>As noted in LV01, “<i>The contractor(s) will retain vegetation where practicable. Where vegetation is lost and trees cannot be replaced in situ due to the restrictions associated with land rights required for operational safety, native shrub planting approved by National Grid will be used as a replacement, in accordance with the outline vegetation reinstatement plans included within the Outline Landscape Environment Management Plan</i>” which is secured in the REAC (Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]).</p>

Reference	Matter	Point Raised	Applicant's Comments
13.67	Operation Phase Impacts – Tourism - Negative	13.67 Surface infrastructure would remain highly visible within the landscape. There would be a consequential impact upon the perception of visitors to the area.	<p>The Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) provides an assessment of the effects of the Proposed Project on visual amenity. This assessment concludes that there would be significant adverse residual effects on nine out of the 23 representative viewpoints at Year 15 (Operation and Maintenance). This comprises receptors from representative viewpoints 1, 3, 4, 5, 15, 19, and 21 which are all located in the highly localised landscape around Saxmundham Converter Station from all directions, and representative viewpoints 2 and 20 to the west of the River Fromus bridge crossing. The permanent infrastructure of the Suffolk Onshore Scheme would remain permanently visible in a proportion of the horizontal extent of view from nearby receptors, with the remainder of the panorama unaffected.</p> <p>A response to this comment regarding tourism impacts, including on visual amenity, is further expanded on in Table 2.1.11 (Reference 115-117) of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>
13.68- 13.69	Decommissioning Impacts – Supply Chain and Economic Development - Positive	<p>13.68 Decommissioning of the Sea Link grid reinforcement project could have some minor positive impacts on the local supply chain through investment in local businesses to support delivery of the decommissioning of the project. However, given the relatively short decommissioning period of the project, the benefits on the local supply chain are not expected to have a long-term impact.</p> <p>13.69 There could be a minor positive impact caused by additional spend by a nonhome based workforce, but the Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.</p>	<p>The decommissioning phase of the Suffolk Onshore Scheme is anticipated to result in employment impacts comparable to those experienced during construction.</p> <p>A response to this comment regarding skills, training and employment can be found in Table 2.11 (References 117-118) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
13.71	Decommissioning Impacts – Supply Chain and Economic Development - Negative	13.71 The Council considers there is a likely negative impact on workforce availability to regional businesses and supply chain due to workforce displacement and churn. This is already being experienced in the county due to existing NSIPs.	A response to this comment regarding workforce churn and displacement can be found in Table 2.11 (References 116) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
13.72	Decommissioning Impacts - Employment, Skills, and Education - Positive	13.72 The Council anticipates potential positive employment, skills, and education impacts. To achieve this positive impact, the Applicant needs to work collaboratively with local stakeholders, share detailed skills and job information in advance, and provide funding for several interventions that will ensure a pipeline of local people can be trained and enter the labour market at the right time with the right skills to take up opportunities that decommissioning of the project will provide.	A response to this comment regarding stakeholder engagement can be found in Table 2.11 (References 112-114) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]
13.74	Decommissioning Impacts - Employment, Skills, and Education - Negative	13.74 The Council considers there is a likely negative impact on workforce availability to regional businesses due to workforce displacement and churn	A response to this comment regarding workforce churn and displacement, and local labour supply can be found in Table 2.11 (References 116-118) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
13.75- 13.76	Decommissioning Impacts – Tourism - Positive	13.75 Decommissioning of this project, once completed, will have a positive impact due to the removal of any and all visual impact to the designated landscapes.	This comment has been noted

Reference	Matter	Point Raised	Applicant’s Comments
		13.76 There may be some short-medium term benefits for accommodation providers due to workforce business, particularly if the scheduling of works allows workers’ utilisation of accommodation to complement the tourist season	
13.78-13.79	Decommissioning Impacts – Tourism - Negative	<p>13.78 Decommissioning of this project is likely to have an impact on the tourism business within 500 meters of the red line boundary and up to 2km of the red line boundary, particularly, but not solely, within the SECHNL. Furthermore, indirect impacts of decommissioning on perception of these areas and consequent perception to visit them is likely to occur, and this issue is exacerbated by core working hours for construction including 7am – 5pm on Sundays and Bank Holidays due to the impacts on the PRoW network and roads used for recreational purposes at times they are most frequently used. Businesses, services, and attractions based on day visitors are likely to be the most sensitive.</p> <p>13.79 There is the potential for decommissioning workers to displace tourists from accommodation. This would result in reduced tourist numbers visiting the area, potentially negatively impacting local tourist businesses. Reliance of the accommodation sector on decommissioning workforce bookings could lead to a “boom and bust” effect.</p>	<p>The Applicant notes that the decommissioning phase of the Suffolk Onshore Scheme is expected to require similar activities to those undertaken during construction and, as a result, is likely to generate impacts comparable to those of the construction phase.</p> <p>A response to this comment regarding impacts on local visitor and tourist accommodation and construction working hours can be found in Table 2.11 (References 127-128) of Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>
13.80-13.84	Required Mitigation	<p>While the positive benefit to local supply chains and businesses from this project on its own may be limited and transient, the significant number of large-scale grid projects in planning within the local area and region, opens some opportunity for investing in local supply chain and businesses that can support the development of these projects. Therefore, the Council expects the Applicant to provide a positive strategy, with key targets for financial investment contribution towards the growth of local supply chains and businesses, enabling these businesses to play key roles in supporting this and other scale grid developments, regionally and nationally. The Applicant would be expected to work with the Council on the structure on how the financial investment would be used in terms of local business targets and schemes to develop local supply chain.</p> <p>13.81 The measures outlined below should be incorporated into a comprehensive Skills and Employment Plan, secured through a legal agreement, in line with EN-1 Section 5.13 which requires Applicants to consider socio-economic impacts, including job creation, training opportunities, and legacy benefits (Paragraphs 5.13.4 and 5.13.11).</p> <p>13.82 The project will have an impact on local labour markets and workforce availability, further exacerbated by the currently extremely low unemployment rate locally and nationally. It is expected that a number of workers will prematurely leave their current employment and this level of churn within the workforce will have a major significant negative impact. To mitigate this effect, the Applicant is expected, through the project, to create employment for those currently economically inactive, as well as to train, attract and employ those entering work and those that are under employed and therefore not impacting upon existing employment numbers. The Applicant should also support those that are transferring from other sectors for better employment. The Applicant is expected to ensure it is an exemplar for inclusion and diversity within its workforce to again ensure it is attracting labour from as many sources as possible beyond the currently employed labour market. As part of the Skills and Employment Plan, the Council expects the Applicant to:</p> <p>i. Conduct a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear</p>	<p>A complete assessment of socio-economic effects has been undertaken. This is set out in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Tourism and Recreation [APP-057] and concludes that there are no anticipated significant effects as a result of the Proposed Project, therefore no mitigation will be required.</p> <p>As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.</p> <p>The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C’s ‘College on the Coast’, to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner.]</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with the Council to ensure robustness and alignment with wider socioeconomic modelling.</p> <p>ii. Deliver and fund, in collaboration with the Council and local partners, activities that develop both local talent pools and local people so that they are enabled to take up opportunities of recruitment into skilled roles across the project.</p> <p>iii. Work collaboratively with the Council to ensure that where possible skills training, aimed at creating wider and deeper local talent pools from which to draw from, also has a long-term demand within the region thus ensuring a greater opportunity for sustainable employment.</p> <p>iv. Set an ambition for 5% of the roles required by the project to be filled through 'earn and learn' positions (the majority of which will be apprenticeships but may also include graduates on formalised training schemes and sponsored students as per the definition of the '5% club') including a commitment to a minimum number of apprenticeship opportunities to be provided to local people.</p> <p>v. Create tangible mechanisms for ensuring that the skills base developed for the construction of the project is as transferable as possible to other key construction projects being delivered regionally.</p> <p>vi. Deliver activities with the Applicant to liaise with local tourism organisations and accommodation providers to understand demand and availability.</p> <p>vii. Ensure that all local accommodation providers are aware of this potential opportunity, liaise through existing networks.</p> <p>viii. Aim to increase the size and diversity of the labour market pool.</p> <p>ix. Put into place clear plans (e.g., commitments within contracts) to drive the behaviours of their associated supply chain(s) to achieve skills and employment outcomes.</p> <p>x. Incorporate social value measures within all activity and use as a tool to quantify the success of any and all interventions and to drive commitment and delivery of the associated supply chain to recruit locally and provide apprenticeship opportunities where feasible; and</p> <p>xi. Commit to a comprehensive Skills and Employment Plan and engagement throughout the planning process, as well during construction, with the Regional Skills Coordination Function at the Council. This would support an ongoing assessment of cumulative effects and a strategic approach to skills and employment. The strategic approach should take into account each distinct phase of the project, feedback from employment monitoring measures and be reflective of the Council's local economics, in particular local opportunity that meets skills legacy for the region.</p> <p>13.83 A legal agreement should be entered into that would provide workforce skills training as supported by EN-1 Paragraph 5.13.11 which encourages Applicants to provide positive provisions to mitigate socio-economic impacts.</p> <p>13.84 In collaboration with the relevant local authorities, the Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme. Likely impacts on these businesses should be identified and a package of mitigation measures developed.</p>	
13.85-13.89	Required Mitigation	<p>13.85 The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an</p>	<p>A response to this comment regarding tourism impacts and the assessment can be found in Table 7.13 (Reference 7.13.1) of Application Document 9.34.6</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers.</p> <p>13.86 The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region.</p> <p>13.87 Due to the potential displacement of visitors from the area and the effect on the visitor economy sector, and in order to mitigate impacts and maximise opportunities, the Council is seeking to secure the following:</p> <p>i. Funding to support local visitor economy initiatives to mitigate impact. ii. Fund to support local visitor economy initiatives to mitigate impact.</p> <p>iii. A s106 legal agreement should be entered into that would provide compensatory funding to address the negative impacts upon the perception of visitors to the area.</p> <p>13.88 The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025.</p> <p>13.89 The Council also encourages project promoters to consider legacy opportunities of all elements of their development.</p>	<p>Applicant's Thematic Responses to Relevant Representations [REP1-116].</p> <p>No significant effects have been identified and therefore no mitigation is required.</p>
13.90	Comments on Application Documents	In what follows, SCC provides comments on relevant application documents. The purpose of this section is to illustrate where improvements to these documents should be made to address the concerns raised in the preceding sections of this chapter in relation to the assessments and mitigation measures currently included in the application.	This comment has been noted
13.91-13.95	Document 6.2.2.10: Environmental Statement Part 2 Suffolk Chapter 10: Socioeconomics, Recreation and Tourism [APP-057]	<p>The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each</p> <p>13.92 The Applicant expects a low level of net additional construction employment to be taken by local residents, due to the jobs being specialised construction. This is based on professional judgements and other similar schemes, but it is not clear that the number of other infrastructure projects taking place in the area, as well as those proposed by the Applicant, and therefore the prevalence of such specialised skills locally has been taken into account.</p>	A response to this comment regarding the 60-minute study area and local labour supply can be found in Table 2.11 (References 117-118) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].

Reference Matter	Point Raised	Applicant's Comments
	<p>13.93 A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the Council would support a strategic approach to this issue.</p> <p>13.94 The local labour force has been assessed to be of “low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses.” The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods. Skills shortages have recently been referenced in the Clean Energy Jobs Plan as well as CITB's Workforce Outlook 2025-2029, Construction Skills Network Industry Outlook 2024-2028, the Technical Skills Legacy Report and Norfolk and Suffolk Wider Green Skills Analysis.</p> <p>13.95 The Council disagrees with the scoping out of Operational Employment due to limited numbers, as this issue should have been considered alongside other projects in the region, which will amplify any effects caused. Specific workforce numbers also need to be provided.</p>	

12. Applicant’s Comments on Chapter 14: Health and Wellbeing

12.1 Introduction

12.1.1 This section provides the Applicant’s comments on Chapter 14: Health and Wellbeing.

12.2 Comments Table

Table 12.1 Applicant’s Comments on Chapter 14: Health and Wellbeing

Reference	Matter	Point Raised	Applicant’s Comments
Local Impact Assessment			
14.43-14.47	Construction Phase Impacts – Neutral	<p>Impact of surface infrastructure and underground cables: Electromagnetic fields.</p> <p>14.44 The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.</p> <p><i>Local Employment</i></p> <p>14.45 The construction phase of the Proposed Project is expected to generate temporary employment, with an average of around 86 direct jobs per year and a peak workforce of 327. Given the specialist nature of many roles, approximately 30% of these positions are anticipated to be filled by residents within the study area. While this represents a modest proportion, it nonetheless brings some economic benefit to the local area, supported by indirect employment through the supply chain and spending by workers.</p> <p>14.46 Access to good quality employment is an important determinant of health and wellbeing, providing income security, opportunities for social connection, and a sense of purpose. These positive effects would be experienced primarily by the locally recruited workforce, and SCC welcome this contribution to community wellbeing. However, the predominance of non-local workers could limit these localised benefits and place additional pressure on housing and community services.</p> <p>14.47 Construction traffic and abnormal loads may also affect travel routes used by local businesses, leading to congestion, delays, and reduced accessibility for customers and suppliers. Businesses situated close to the Order Limits may experience both opportunities and challenges, benefiting from increased demand for accommodation and local services, but also facing potential disruption from noise, access changes, and short-term impacts on amenity.</p>	<p>A response to this comment regarding Electromagnetic fields. can be found in Table 1.11 (Reference <i>ESC – Mental Health and Wellbeing</i>) and Table 1.12 (Reference <i>ESC – Compensation</i>) of Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>A response to this comment regarding construction impact on local businesses, and amenity impacts can be found in Table 2.11 (References <i>119-120</i>) of Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
			A response to this comment regarding construction impact on local businesses, and amenity impacts can be found in Table 2.11 (Reference 115) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]
14.48-14.51	Construction Phase Impacts – Negative - <i>Impact on access and use of PRowS and social infrastructure</i>	<p>14.48 Temporary or permanent closures, diversions, or reductions in amenity and access to social infrastructure, the PRow network and green and blue spaces, combined with increased traffic, noise, and other construction related disturbances, have the potential to adversely affect community health and wellbeing. These impacts are likely to be most pronounced for older people, those with limited mobility, and residents without access to private transport. Such disruptions risk widening existing health inequalities, as those already experiencing barriers to good health are likely to be disproportionately affected by the loss of accessible, low-cost opportunities for activity and social engagement.</p> <p>14.49 These spaces and routes provide important opportunities for physical activity, recreation, and social connection, all of which are recognised determinants of good physical and mental health. PRowS and green/blue spaces in particular enable informal activity such as walking, cycling, and nature-based recreation (e.g. birdwatching), supporting cardiovascular fitness and overall wellbeing without the need for structured exercise.</p> <p>14.50 The Applicant's assessment ([APP-058], paragraphs 11.9.53–11.9.59), acknowledges that construction traffic associated with the Suffolk Onshore Scheme may increase community severance between neighbourhoods, reducing access to community facilities and social interaction, and that the population's sensitivity in this area is high given the relatively low baseline sense of community and rural tranquillity. However, the conclusion that the likely effects on transport, access, and social cohesion will be “not significant and short-term” appears optimistic. In practice, the combination of increased traffic, restricted access, loss of tranquillity, and the visual and noise intrusion of construction activity is likely to result in a more noticeable and enduring adverse effect on community wellbeing, particularly on mental health and sense of place.</p> <p>14.51 These effects are expected to be exacerbated by the proposed lengthy working hours, including activities on Sundays and Bank Holidays, which limit opportunities for rest and leisure. Moreover, when considered alongside the cumulative influence of other NSIPs already underway or planned in the locality, the potential for sustained stress, fatigue, and erosion of social cohesion is likely to be greater than the assessment currently suggests. SCC therefore considers that residual impacts on wellbeing, social cohesion, and mental health may be understated in the Applicant's conclusions.</p>	<p>A response to this comment regarding adverse effects on community health and wellbeing can be found in Table 2.12 (against Reference 135) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p> <p>A response to this comment regarding the specific health and wellbeing effects as a result of access to PRow and open space can be found in Table 2.2 (against Reference 35 to 36) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p> <p>A response to this comment regarding adverse effects on community wellbeing and social cohesion can be found in Table 2.10 (against Reference 111) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>A response to this comment regarding the health and wellbeing effects as a result of the proposed working hours and cumulative impact can be found in Table 2.12 (against Reference 137) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>
14.52-14.55	Construction Phase Impacts – Negative - <i>Impact of restricted access to health infrastructure</i>	<p>14.52 Disruptions in access to healthcare services can contribute to heightened stress and anxiety within the local population, compounding broader mental health and wellbeing impacts. These effects are likely to be further exacerbated during peak construction periods and further as a result of the proposed lengthy working hours. Construction activities associated with the Proposed Project may result in temporary or prolonged restrictions to key health infrastructure, including hospitals, GP practices, and pharmacies. Such restrictions could affect the ability of residents, particularly vulnerable groups such as the elderly, disabled, or those with chronic conditions, to obtain timely care.</p> <p>14.53 The Applicant's assessment ([APP-058], paragraphs 11.9.2–11.9.19) acknowledges that construction activities may temporarily restrict access to hospitals, GP practices, and other social infrastructure, and that increased traffic could contribute to community severance and inhibit access to healthcare facilities. The assessment concludes that the magnitude of effect would be 'negligible' and 'not significant' due to the limited duration of works, baseline capacity within local GP services, and the assumption that existing emergency services can absorb any additional demand.</p> <p>14.54 While these factors are noted, SCC consider this conclusion to understate the potential real-world effects on community health and wellbeing. Even short-term disruption can have meaningful consequences for vulnerable residents, particularly in rural areas where alternative routes or transport options may be limited. The assumed resilience of healthcare access does not fully reflect the potential cumulative pressures arising from other NSIPs operating concurrently in the region, nor the additional stress and uncertainty that such disruption may generate among residents reliant on regular healthcare access.</p> <p>14.55 SCC consider that the potential adverse effects on access to healthcare services, and the associated mental health and wellbeing implications, are likely to be greater than the Applicant's assessment suggests, particularly for older adults, those with limited mobility, or without access to private transport.</p>	<p>Section 11.9 of Application Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses potential effects of the Proposed Project on health and wellbeing of local residents. The assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Proposed Project which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). The assessment has been completed in line with the Institute of Environmental Management and Assessment (IEMA) guidance "Determining Significance For Human Health In Environmental Impact Assessment". As such, a complete assessment of health and wellbeing effects has been undertaken. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>The cumulative impact is also assessed in Application Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which considers current assumptions of working hours, to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'.</p>
14.56-14.57	Construction Phase Impacts – Negative – Public Mental Health	<p>14.56 The consenting and construction of major infrastructure projects such as the Proposed Scheme can have significant and enduring impacts on the mental health and wellbeing of local residents. Changes to the local environment, including alterations to landscape character, increased noise, vibration, activity, and the presence or introduction of large-scale infrastructure, can diminish residents' sense of place, belonging, and control. Uncertainty surrounding the scale, duration, and nature of the works, as well as concerns about continued access to essential services, community facilities, social infrastructure and</p>	<p>A response to this comment regarding adverse effects on community wellbeing and mental health including social cohesion can be found in Table 2.12 (against Reference 135) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>green/blue spaces, may contribute to heightened stress, anxiety, and reduced quality of life, particularly among vulnerable groups such as older people, disabled residents, and those without access to private transport.</p> <p>14.57 The Applicant's assessment ([APP-058], paragraphs 11.9.85-11.9.86) concludes that the magnitude of impacts on health and wellbeing from social cohesion and community identity during the operational and maintenance phase would be small and therefore not significant. This conclusion appears to underestimate the likely extent and persistence of community level stressors. It is not clear that the assessment has fully captured the psychological and social effects of long-term environmental change, including the perception of industrialisation of rural areas. This point is particularly pertinent to the Applicant's cumulative effects assessment on this receptor [APP-060] on account of the likely exacerbation of these effects in combination with the construction and operation of other major infrastructure projects with spatio-temporal overlap.</p>	<p>A response to this comment regarding cumulative health and wellbeing impacts can be found in Table 2.12 (Reference 136) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p>
14.58-14.60	Construction Phase Impacts – Negative – Working Hours	<p>14.58 A particular concern for public health is the proposed construction working hours, which, as currently set out, would allow activities from as early as 07:00 -19:00 on weekdays plus a provision for start-up and close-down activities up to 1 hour either side of these core working hours, and from 07:00 – 17:00 on weekends and bank holidays. This leaves local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption. Continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities.</p> <p>14.59 SCC note that the working hours proposed for Sea Link Development are less favourable than those applied to the Scottish Power Renewables (SPR) onshore transmission works. SPR DCO indicates core working hours of 08:00– 18:00 Monday–Friday and 08:00–13:00 on Saturdays, with no works on Sundays or Bank Holidays, and a clear stipulation that start up and closedown periods must not involve activities likely to cause disturbance to local residents or businesses.</p> <p>14.60 SCC considers that, since it is clear that the Applicant can deliver its project under Scenario 1 (which relies on the provision of the Friston sub-station via the SPR DCO(s)), and so abide by the working hours set out in the SPR DCO(s), there is no good reason why the Applicant should not also be able to deliver its project under Scenario 2 whilst abiding by those same working hours, at least as regards the works related to the Friston sub-station. SCC also considers that, irrespective of the SPR DCOs and whether Scenario 1 or Scenario 2 is applicable, there is a strong case for ensuring that there is community respite from construction activity and associated construction traffic on Saturday afternoons, and on Sundays and Bank Holidays.</p>	<p>A response to this comment regarding the health and wellbeing impact of working hours on local communities can be found in Table 2.11 (Reference 137) of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p> <p>A response to this comment regarding the coordination of projects can be found in Table 2.2 (against Reference 37) of Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>The working hours required for one project are not necessarily those required for another; nor are the impacts of working hours equal over types of activities, projects and locations. Therefore, there is no justification for the working hours required by Scottish Power Renewables for the construction of offshore wind farms to be the same as those required for the Applicant for Sea Link. However, recognising the concern and complications associated with different working hours at the Friston site, particularly given the inclusion of Friston substation in all three applications, the Applicant has agreed to mirror the working hours agreed on the Scottish Power Renewables project at the Friston site. This commitment has been incorporated into requirement 7 (7) in the draft DCO.</p>
14.61-14.66	Construction Negative Effects – Cumulative Impacts	<p>14.61 The potential for cumulative impacts, where multiple infrastructure projects are present or anticipated in the area, is also recognised as a factor that can intensify feelings of frustration, loss of control, and diminished community cohesion. These effects are not limited to the physical environment but extend to the social and psychological wellbeing of individuals and the wider community.</p> <p>14.62 The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are “minor adverse (not significant)” and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment does acknowledge that for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there</p>	<p>A response to this comment regarding cumulative health and wellbeing impacts can be found in Table 2.12 (Reference 136) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>is potential for significant cumulative effects during construction, operation, and decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific mitigation is confirmed for these cumulative effects.</p> <p>14.63 [APP-060] identifies the potential for inter-project cumulative impacts on health and wellbeing, particularly linked to landscape and visual amenity, noise and vibration, traffic and transport, and social cohesion. However, the Applicant concludes that, because individual effects from each project are generally assessed as “minor adverse (not significant)” and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is “not significant.” This conclusion is reached despite the recognition that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity. The Applicant should also acknowledge that it cannot be certain at present that peak construction periods of these projects will not overlap and that a reasonable worst-case scenario would account for the effects of such a scenario especially in relation to Sizewell C and the removal of the EA1N/EA2 haul road.</p> <p>14.64 SCC considers that in respect of cumulative impacts, the approach within assessments [APP-058], [APP-059] and [APP-060] does not fully reflect the lived experience of affected communities, nor does it adequately account for the psychological and social impacts of prolonged uncertainty, repeated disruption, and the progressive industrialisation of the local environment. The cumulative sense of disruption, uncertainty, and loss of amenity, especially where multiple NSIPs are present or anticipated, can intensify adverse mental health outcomes beyond what is reflected in the Applicant’s “minor adverse” classification. This is particularly relevant for vulnerable groups, including older people, disabled residents, and those without access to private transport, who may have fewer options for respite or alternative access to services and green spaces.</p>	
14.65-14.66	Construction Negative Effects - Community Engagement	<p>14.65 Effective community engagement is fundamental to protecting and promoting public health in the context of major infrastructure projects. Meaningful engagement enables communities to understand, influence, and adapt to changes that may affect their environment, wellbeing, and daily lives. Research and local experience in Suffolk demonstrate that when communities feel excluded from decision making, or when engagement is limited to statutory minimums, there can be significant negative impacts on mental health and wellbeing, including increased anxiety, loss of trust, and a diminished sense of control and belonging. Conversely, early, honest, and continuous engagement can actively mitigate these impacts, giving a sense of agency, inclusion, and build resilience within affected communities.</p> <p>14.66 The Applicant’s Consultation Report [APP-301] demonstrates that national policy and statutory requirements for community engagement have been followed. However, while these measures may meet the legal baseline, SCC’s SGD encourages project promoters to go further. Suffolk County Council has published a Supplementary Guidance Document (SGD) for NSIP developers about Community Engagement and Wellbeing, supporting its Energy and Climate Adaptive Infrastructure Policy. This guidance emphasises that effective engagement must go beyond statutory minimums, requiring project promoters to build relationships of trust, confidence, and understanding with local communities. SCC consider it essential for promoters to adopt a collaborative approach, involving the community meaningfully in the design and delivery of the project. Clear, comprehensive, honest, and open engagement throughout the consenting, construction, and decommissioning phases is vital to safeguarding community wellbeing, as it ensures residents feel listened to and that their views are genuinely considered. The SGD specifically recognises that the scale and</p>	<p>A response to this comment regarding consultation and community engagement can be found in Table 2.12 (in response to Reference 132 to 134 and 138 to 140) of Application Document 9.34.1 Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
		pace of change, uncertainty about project impacts, and the cumulative effect of multiple infrastructure schemes can all contribute to significant mental health and wellbeing impacts.	
14.68	Operation Phase Impacts – Netural –	<p><i>Electromagnetic fields</i></p> <p>Operational impacts related to Electrical infrastructure with associated Electrical and Magnetic forces are consistent with those described for the construction phase.</p> <p><i>Local Employment</i></p> <p>14.69 Minimal impact</p> <p><i>Impact on access and use of PRoWs and social infrastructure</i></p> <p>14.70 Minimal impact</p> <p><i>Impact of restricted access to health infrastructure</i></p>	This comment is noted.
14.72-14.74	Operation Phase Impacts – Negative – Public Mental Health	<p>The operation of the Proposed Scheme may continue to exert influences on the mental health and wellbeing of local residents and communities. Once operational, changes to the local environment such as visual intrusion, maintenance traffic movements, lighting, and changes in local air quality may alter residents' sense of place, comfort, and security. The permanent presence of large-scale infrastructure can transform local character and identity, potentially leading to feelings of loss, disconnection, or reduced satisfaction with the living environment. Concerns regarding long term environmental impacts, perceived risks to health and safety, or the fairness of who benefits from or bears the burdens of the scheme may also contribute to sustained anxiety, mistrust, or frustration among affected communities.</p> <p>14.73 The potential for cumulative operational effects, particularly where multiple NSIPs or industrial developments coexist in the same area, is also a recognised stressor. Persistent noise, vibration, traffic, lighting, or landscape impacts from several projects can collectively erode community cohesion, amplify perceptions of neglect or inequity, and intensify feelings of fatigue or resignation. These effects extend beyond physical nuisance to encompass deeper psychosocial effects, including a diminished sense of agency and belonging.</p> <p>14.74 Suffolk County Council's Supplementary Guidance Document (SGD) for NSIP developers on Community Engagement and Wellbeing remains relevant throughout operation, emphasising that developers have an ongoing responsibility to maintain transparent communication and responsive engagement with communities. Continued monitoring, timely dissemination of information about operational impacts, and accessible channels for feedback or complaint resolution are essential to supporting mental health and sustaining public trust. The Council's approach emphasises that proactive, empathetic, and enduring engagement is critical in ensuring that operational impacts do not undermine the long-term wellbeing, resilience, and cohesion of local communities.</p>	<p>A response to this comment regarding the assessment of mental health impacts on local communities can be found in Table 2.12 (in response to Reference 135) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>A response to this comment regarding cumulative health and wellbeing impacts can be found in Table 2.12 (Reference 136) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>A response to this comment regarding consultation and community engagement can be found in Table 2.12 (in response to Reference 132 to 134 and 138 to 140) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

Reference	Matter	Point Raised	Applicant's Comments
14.76-14.77	Decommissioning Phase Impacts – Neutral	<p><i>Electromagnetic</i></p> <p>Decommissioning impacts related to Electrical infrastructure with associated Electrical and Magnetic forces are consistent with those described for the construction phase.</p> <p><i>Local Employment</i></p> <p>14.77 Decommissioning impacts related to local employment are consistent with those described for the construction phase.</p>	This comment is noted.
14.78-14.80	Decommissioning Phase Impacts - Negative	<p><i>Impact on access and use of PRowS and social infrastructure</i></p> <p>14.78 Decommissioning impacts related to access and use of PRowS and social infrastructure are consistent with those described for the construction phase.</p> <p><i>Impact of restricted access to health infrastructure</i></p> <p>14.79 Decommissioning impacts related to access to health infrastructure are consistent with those described for the construction phase.</p> <p><i>Public Mental Health</i></p> <p>14.80 Decommissioning impacts related to Public Mental Health are consistent with those described for the construction phase.</p>	This comment is noted.
14.82 – 14.85	Required Mitigation – Local Employment	<p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at project level, as they do not consider this to be an efficient or effective approach (Chapter 10, Socioeconomics, Recreation and Tourism, March 2025, Table 10.1). SCC do not agree with this conclusion.</p> <p>14.83 To maximise the positive economic and health impacts of the Proposed Project, SCC believe the Applicant should develop and implement a Local Employment and Skills Plan prepared in collaboration with SCC. The plan should include clear and measurable commitments to prioritise local labour and supply chain engagement and to deliver targeted skills, training, and apprenticeship programmes aligned with Suffolk's Economic Strategy / Local Growth Plan. It should also include a robust monitoring and reporting framework to demonstrate progress, ensure accountability, and enable management of commitments throughout the construction phase.</p> <p>14.84 Ongoing engagement with affected businesses, particularly those close to the Order Limits, should be maintained to ensure that concerns about access, amenity, and service disruption are addressed in a timely manner.</p> <p>14.85 Further information on this issue can be found in the Socioeconomics, Recreation and Tourism section of this Local Impact Report.</p>	<p>The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are a source of concern for local employment and the wider economy. To address this, the Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified following the application of appropriate mitigation.</p> <p>The Applicant is willing to work collaboratively with the Council. The Applicant will, in collaboration with its main works contractors, develop and implement a Social Value strategy. As the Proposed Project develops, the detail of the approach can be shared and discussed with a view to benefit the local economy.</p> <p>As part of the DCO Application, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.</p> <p>The Applicant is exploring potential coordination with other projects in Suffolk, such as Sizewell C's 'College on the Coast', to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner.</p>
14.86-14.88	Required Mitigation – Impact on access and use of PRowS and social infrastructure	<p>SCC are satisfied that the mitigations set out in the Construction Environmental Management Plan provide a reasonable framework to minimise the effects of reduced or restricted access and amenity during the project phases from a public health perspective. These measures collectively support the safeguarding of public wellbeing by ensuring that PRowS and access routes are subject only to short duration closures with clear signage and advance communication, and that reinstatement is carried out promptly to at least the original condition, supported by pre-condition surveys and photographic records. SCC also recognises that a Public Rights of Way Management Plan must be approved by the relevant</p>	This comment is noted.

Reference	Matter	Point Raised	Applicant's Comments
		<p>discharging authority before construction can commence. This plan must be robust in order to minimise the effects on PRowWs as far as possible.</p> <p>14.87 Nonetheless, SCC recognises that, even with these measures in place, there will be an unavoidable residual negative impact on local access, amenity, and community wellbeing relative to the existing baseline. While the proposed mitigations will reduce disruption, they cannot eliminate it entirely.</p> <p>Consequently, the overall effect on local residents, visitors, and businesses during the construction period is expected to remain adverse.</p> <p>14.88 Mitigation measures related to core working hours are set out below under title 'Working Hours.'</p>	<p>A response regarding health and wellbeing effects including on local access, amenity, and community wellbeing can be found in Table 12.2 (against Reference 135 and 137) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
14.89-14.92	Required Mitigation – Impact of restricted access to health infrastructure	<p>To minimise these impacts of disrupted access to healthcare services, SCC expect the Applicant to embed and monitor measures outlined in relevant plans including the outline CTM&TP, outline CoCP, and outline PRowW management plan. Early engagement with affected communities, healthcare providers, and local authorities will be essential.</p> <p>14.90 The Applicant should coordinate construction schedules to reduce disruption, including coordination with other NSIPs underway or planned in the area, with clear communication to affected communities and healthcare providers on planned works. Where closures or diversions are unavoidable, temporary access arrangements, alternative routes and/or shuttle services must be provided. The Applicant should commit to minimising the duration of restricted access and ensure robust monitoring to address unforeseen issues promptly.</p> <p>14.91 Notwithstanding these measures, SCC recognise that residual adverse effects on access to healthcare services are unavoidable when compared to the existing baseline. While the proposed mitigations will reduce the scale and duration of disruption, they cannot fully offset the inconvenience and potential access challenges experienced by patients, staff and emergency responders during construction.</p> <p>14.92 Mitigations measures related to core working hours are set out below under title 'Working Hours.'</p>	<p>This comment is noted.</p> <p>A response to this comment regarding the coordination of projects can be found in Table 2.2 (against Reference 37) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>A response to this comment regarding cumulative health and wellbeing impacts can be found in Table 2.12 (Reference 136) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
14.93-14.96	Required Mitigation – Public Mental Health	<p>Working hours</p> <p>14.93 To effectively mitigate the effects of prolonged construction disturbance on community wellbeing, SCC expect the Applicant to revise the proposed core working hours to minimise avoidable noise, vibration, and disruption and protect public mental health. Construction activity should be limited to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC.</p> <p>14.94 Start-up and close-down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses.</p> <p>Cumulative Impacts</p>	<p>A response to this comment regarding the health and wellbeing impact of working hours on local communities can be found in Table 2.11 (Reference 137) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</p> <p>A response to this comment regarding the coordination of projects can be found in Table 2.2 (against Reference 37) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>Responses to points on working hours are provided above in this document. However, the Applicant does recognise the concern and</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>14.95 Mitigations are required to address cumulative impacts identified in Document 6.2.2.12, where no specific measures are currently confirmed. A robust mitigation strategy should be secured through the DCO and embedded in the CEMP, with design and monitoring undertaken in partnership with affected communities. This must include participatory engagement and adaptive monitoring throughout construction, operation, and decommissioning to ensure timely response to emerging wellbeing risks. The Applicant should seek to coordinate with the promoters of nearby projects to minimise cumulative impacts.</p> <p>Community Engagement</p> <p>14.96 Whilst SCC welcomes the commitment within the REAC [APP-342] regarding community liaison, it is not sufficient to address the full range of community wellbeing and mental health impacts associated with the project as set out in this chapter. To aid in mitigating these effects, community engagement should go beyond the REAC focus on providing information and a procedure for complaints. SCC expects the Applicant to implement the following measures, as set out in Suffolk County Council's Community Engagement and Wellbeing Supplementary Guidance Document:</p> <p>i. Appoint a dedicated 'relationship manager' - an impartial, consistent point of contact for the community, to facilitate dialogue, address concerns, and provide timely, high quality, and accessible information. ii. Engage in regular, face-to-face conversations with community leaders, parish councils, and residents, ensuring technical information is explained clearly and that feedback mechanisms are in place and responsive.</p> <p>iii. Invest in local community assets (such as public spaces, village halls, or community organisations) as a form of mitigation and compensation, with assets identified in close collaboration with the community itself. iv. Support community mental health and resilience by funding local mental health organisations, providing Mental Health First Aid training for community members, and promoting resources such as East Suffolk Council's WellMinds.</p> <p>v. Adopt the SGD's principles of early, honest, and continuous engagement, including the creation of a community panel to participate in project design, and the use of participatory monitoring and adaptive management to track and respond to wellbeing impacts over time.</p> <p>vi. Provide clear information on compensation and discretionary purchase schemes, ensuring that access to support does not create undue administrative burden or anxiety for affected individuals.</p> <p>vii. Monitor and evaluate community wellbeing using established tools (such as the Suffolk Emotional Needs Audit) and adapt engagement and mitigation strategies in response to feedback and changing community needs.</p>	<p>complications associated with different working hours at the Friston site, particularly given the inclusion of Friston substation in all three applications, the Applicant has agreed to mirror the working hours agreed on the Scottish Power Renewables project at the Friston site. This commitment has been incorporated into requirement 7 (7) in the draft DCO.</p> <p>A response to this comment regarding cumulative health and wellbeing impacts can be found in Table 2.12 (Reference 136) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p> <p>A response to this comment regarding consultation and community engagement can be found in Table 2.12 (in response to Reference 132 to 134 and 138 to 140) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>

13. Applicant’s Comments on Chapter 15: Draft Development Consent Order

13.1 Introduction

13.1.1 This section provides the Applicant’s comments on Chapter 15: Draft Development Consent Order.

13.2 Comments Table

Table 13.1 Applicant’s Comments on Chapter 15: Draft Development Consent Order

Reference	Matter	Point Raised	Applicant’s Comments
15.3	Article 2(1) (interpretation)	The definition of “maintain” includes the replacement of any or all of the authorised development. SCC would like to know to what extent “replacement” has been assessed and where this is considered in the Environmental Statement.	Maintenance considered within the EIA is described in Section 4.10 Maintenance of Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1A-003] . These activities have been assessed in the Environmental Statement. The ES does not consider scenarios where all of the Proposed Project, or even large sections, would need to be replaced because such scenarios are considered to be very unlikely, whereas the purpose of EIA is to identify likely significant effects. The environmental effects of maintenance work would be no greater, and likely much lower, than the effects resulting during construction of the Proposed Development so are not reported separately.
15.4	Article 2(1) (interpretation)	The definition of “permit scheme” means a permit scheme in force on the date on which the Order is made. SCC consider the definition should allow for the situation where a permit scheme is updated after the date on which the Order is made. It would be strange for an extant permit scheme to control certain works in Suffolk and for a historic permit scheme to control others.	The Applicant will consider this drafting point in the next iteration of the draft DCO which will be submitted at Deadline 3
15.5	Article 2(1) (interpretation)	The definition of “pre-commencement operations” is wide-ranging and goes well beyond the “minor set up operations ... which are either de minimis or have minimal potential for adverse impacts” referred to in paragraph 4.6.12 of the Explanatory Memorandum (“EM”) [AS-090]. SCC would like to know – i. how each operation will be controlled (especially the “set up works associated with the establishment of construction compounds” (sub-paragraph (m)) and “temporary accesses” (sub-paragraph (n)). ii. which buildings are proposed to be demolished as part of the “pre-commencement operations” (sub-paragraph (i)), iii. the relevant paragraphs of the ES which deal with the assessment of these works. (This request is made in the context of paragraph 4.6.14 of the EM [APP-090] which states: “The Environmental Statement does not indicate that the excluded works and operations would be likely to have significant environmental effects. For this reason, National Grid considers that the exclusion of these works and operations from the definition is appropriate.”).	(i) Requirement 5)(3) states that for the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the plans listed in requirement 5 and the outline management plans listed in requirement 6. In addition, Requirement 12 (Highway Works) states that all pre-commencement operations involving the construction or alteration of temporary accesses must be carried out in accordance with the requirement. No work to construct, alter or temporarily alter any new or existing means of access to a highway to be used by vehicular traffic may commence until written details of design, layout and reinstatement of that means of access has been submitted to and approved by the local highway authority.
			(ii) The Applicant has not currently identified any buildings that would need to be demolished. If this is to be required, it would be due to unforeseen circumstances.

Reference	Matter	Point Raised	Applicant's Comments
			(iii) The measures relied upon to mitigate environmental effects relating to the establishment of compounds are typically best site practice measures that are already detailed in application documents and are unlikely to be reliant upon further detail needing to be agreed with the local planning authorities. The Applicant would be happy to discuss this point further with SCC to establish if there are additional measures or plans that may secure this position further.
15.6	Article 2(1) (interpretation)	SCC notes that several of the excluded works are temporary works. For example: temporary accesses (sub-paragraph (n)); erection of any temporary means of enclosure or temporary demarcation fencing marking out site boundaries (sub-paragraph (o)); and the temporary display of site notices or advertisements (sub-paragraph (p)). Requirement 9(1) (reinstatement schemes) states “any land within the Order limits which is used temporarily for construction is to be reinstated to a condition suitable for its former use ...”. Would each of the excluded temporary works fall within Requirement 9(1)? If not, why not?	Requirement 9(3) states that the requirement to reinstate the land to a condition suitable for its former use is subject to the provisions of article 27 (temporary use of land for carrying out the authorised project). Therefore, the reinstatement of any land used for temporary works will be subject to the provisions in Article 27 which do not require the undertaker to carry out certain activities. The power does not differentiate between whether land is used temporarily for pre-commencement operations or other works as the pre-commencement operations defined in article 2(1) form part of the Authorised Project.
15.7	Article 2(1) (interpretation)	Regarding “temporary accesses” (sub-paragraph (n)), SCC’s highways team would welcome as much information as possible regarding any temporary works which would affect the Consultee’s highways and expects the provision of any “temporary accesses” to be controlled in protective provisions or in a highways side agreement. Please can the Applicant confirm this will be the case.	Requirement 12 (Highway Works) states that all pre-commencement operations involving the construction or alteration of temporary accesses must be carried out in accordance with the requirement. No work to construct, alter or temporarily alter any new or existing means of access to a highway to be used by vehicular traffic may commence until written details of design, layout and reinstatement of that means of access has been submitted to and approved by the local highway authority. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated.
15.8	Article 7 (consent to transfer benefit of Order)	This article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable and that the dDCO is updated to reflect this.	The Applicant will consider this drafting point in the next iteration of the draft DCO which will be submitted at Deadline 3
15.9	Article 10(2) (planning permission and other consents)	This provides that any planning permissions or DCO which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the Project and the development authorised under that planning permission or DCO. It would be helpful if the Applicant would confirm whether it has any specific planning permission or DCO in mind.	The Applicant does not have currently have a specific planning permission or DCO in mind. This Article has been included to provide the Applicant with sufficient flexibility and the article seeks to address any risks which could arise from the decision in <i>Hillside Parks Ltd v Snowdonia National Park Authority 2022 UKSC [30]</i> .
15.10	Article 11(1) (street works)	Absent a suitable highways side agreement or protective provisions to protect SCC’s highways interests, SCC considers art.11(1) should be subject to the street authority’s consent.	The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated, including in relation to protective provisions. The Applicant does not consider that any amendment to the draft DCO is necessary at this stage.
15.11	Article 11(1) (street works)	The same point applies in respect of the following articles:14(1) (power to alter layout, etc. of streets), 15(1) (temporary closure of streets and public rights of way and permissive paths), 16(1) (permanent stopping up of streets and public rights of way) and 17(1)(a) (access to works).	
15.12	Article 11(2) (street works)	Under several of the draft DCO’s articles (including article 11(2)), SCC is required to grant approval for certain street works, and provision is made to say that	The Applicant notes this comment.

Reference	Matter	Point Raised	Applicant's Comments
		approval must not be “unreasonably withheld or delayed” and there is also a provision that it is deemed to be given after 35 days.	
15.13	Article 11(2) (street works)	SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be “unreasonably withheld or delayed” and so these words should be removed from article 11(2).	The Applicant does not agree with the suggestion that the inclusion of deeming provisions in the draft DCO (document 3.1 (E)) negates the need for the draft DCO to also state that approvals must not be unreasonably withheld or delayed. Taking account of the critical national need for the Proposed Project, the Applicant envisages that there may well be situations where a more straightforward or routine approval is sought from the relevant authority and where it would therefore be reasonable to expect a decision to be proactively taken without delay by the authority at the earliest opportunity – notwithstanding the ultimate fall-back position of a deemed consent mechanism.
15.14	Article 11(2) (street works)	SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2), 15(5)(b) (temporary closure of streets and public rights of way and permissive paths), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 22(5) (authority to survey and investigate the land), 50(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.).	The Applicant would, in practical terms, anticipate working closely with the relevant authority to provide advance notice, where practicable, of any requests for approval to which a deeming provision would apply under the draft DCO. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated.
15.15	Article 11(3) (street works)	Provides that if a street authority fails to respond to an application for consent within 35 days of the application being made, that street authority is deemed to have given its consent.	The Applicant notes this comment.
15.16	Article 11(3) (street works)	While SCC will ensure that any application for consent will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented ⁵⁵ . A 35-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.	The Applicant acknowledges this but submits that the timescales proposed in the draft DCO are appropriate and preceded by other DCOs. The Applicant does not consider that the suggested alternative timescale of 56 days is conducive to the timely delivery of a project for which there is a critical national need. The Applicant has also included the words “or such other period agreed by the street authority and the undertaker” in each of the relevant deeming provisions within the dDCO. It is intended that such wording will allow for matters, including requests made by the Councils for further information, to be dealt with on a case-by-case basis.
15.17	Article 11(3) (street works)	Given the volume of work which will arise from the number of NSIPs being delivered in Suffolk, SCC considers 35 days is too short and requests that it is replaced with 56 days. SCC also considers that this period should be paused if the highway authority considers that additional information is reasonably required to make a decision.	In any event, the Applicant is committed to working closely with the relevant street and highways authorities to ensure that they are aware of when applications are proposed to be submitted.
15.18	Article 11(3) (street works)	SCC requests that 35 days is also replaced with 56 days in the following provisions: 14(5) (power to alter layout, etc. of streets); 15(9) (temporary closure of streets and public rights of way and permissive paths); 17(2) (access to works); 20(9) (discharge of water); 22(8) (authority to survey and investigate land), 50(9) (traffic regulation) and 51(5) (felling or lopping).	In this context, the Applicant anticipates that the process regarding the provision of additional information is a matter which would be readily capable of being addressed through further dialogue with SCC Highways and through any Highways PPs or other agreement which may be entered into.
15.19	Article 11(3) (street works)	A similar point applies in respect of paragraph 1(1) (applications made under requirements) of Schedule 4 (discharge of requirements), which is mentioned below.	The Applicant notes this comment.
15.20	Article 12(2)(d) (application of the permit schemes)	This provision prohibits “the relevant street authority” from permitting certain works at a certain time but then says “local highway authority” may grant a permit for immediate works. Should those references be to the same body? If not, why not? Also, the term “local highway authority” is not a defined and, in the articles, is only used in the definitions of “relevant highway authority” and “relevant street authority” (article 2(1). In articles 12(3), (4) and (5) “the relevant highway authority” is referred to and SCC wonders whether that term should also be used (whether	The Applicant will consider this drafting point in the next iteration of the draft DCO which will be submitted at Deadline 3.

Reference	Matter	Point Raised	Applicant's Comments
		once or twice) in article 12(2)(d). SCC would welcome the Applicant's explanation on this drafting point.	
15.21	Article 13(3) and (4) (application of the 1991 Act)	SCC is concerned by the extent of disapplication proposed by article 13(3) and (4).	The Applicant welcomes further engagement with SCC Highways regarding the street works powers and the application of the 1991 Act to understand their concerns. The Applicant considers that the provisions are appropriate in the context of this Project. The disapplication in article 13(3) and (4) has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.
15.22	Article 15 (temporary closure of streets and public rights of way and permissive paths)	By article 15(1), the undertaker may, "for any reasonable time" divert traffic from the street or public right of way; and prevent all persons from passing along the street or public right of way or permissive path. SCC would welcome more information as to what "a reasonable time" might be.	<p>The Applicant notes that this is well-precedented wording and notes the wording in 15(1) which requires that such diversions or prevention of access must be for the purposes of carrying out the authorised project.</p> <p>The temporary diversion of Public Rights of Way are assessed in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. As stated in paragraph 2.5.2 of Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request [CR1-043]) a temporary PRow diversion is a temporary diversion which has been applied to a section of PRow to allow works such as cable installation activities. All diversions are intended to reduce inconvenience as much as possible with regard to minimising diversion length and providing a comparable surface condition. The duration of each diversion will vary, but the key principle of only keeping the diversion in place for as long as necessary to complete the required construction works would be applied at all times. Temporary diversions will then be reinstated to their original route on completion of the construction works. Impacted PRow and the durations of the temporary diversions are set out in Table 5.1 of Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Version 2, change request) [CR1-043].</p>
15.23	Article 15 (temporary closure of streets and public rights of way and permissive paths)	In addition, SCC considers that article 15 should provide that any temporary diversion specified in column (4) of Part 1 of Schedule 8 (streets, public rights of way and permissive paths to be temporarily closed) must be open for use, and in the case of a street, must be completed to the reasonable satisfaction of the street authority, before the corresponding street or public right of way in temporarily stopped up, altered or diverted.	<p>Article 15(4) already states that if a street, public right of way or permissive path specified in Part 1 of Schedule 8 is to be temporarily closed, altered or diverted, the undertaker must provide the temporary diversion as specified in column (4) of that Part. If a street, public right of way or permissive path is 'provided', the implication is that it must therefore be open for use. The Applicant does not consider that any amendment to the drafting is necessary.</p> <p>Article 15(5) states that the street authority must be consulted before the undertaker temporarily closes, alters or diverts any street, public right of way or permissive path specified as mentioned in paragraph (4).</p> <p>Given the temporary nature of the diversions, the Applicant does not consider that it is feasible for a temporary diversion to be completed to the reasonable satisfaction of the street authority, taking into account the Applicant's duties to act economically and efficiently. Therefore, and noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008, the Applicant cannot agree to include the additional wording in Article 15.</p>
15.24	Article 15(5)(b) (temporary closure of streets and public rights of way and	This provision refers to the street authority's ability to attach reasonable conditions to a certain consent. Other provisions which state conditions may be added to a consent include articles 20(3) (discharge of water) and 41(3)(a) (crown rights); however, other provisions which provide for consent are silent as to whether	The Applicant does not consider that it is necessary to add any additional wording to clarify that a discharging authority has the discretion for reasonable conditions to be attached to an approval or consent.

Reference	Matter	Point Raised	Applicant's Comments
	permissive paths)	conditions can be added. Since there is no restriction on the imposition of conditions, SCC considers that can be added; however, for clarity and consistency, SCC considers each provision which provides for the grant of consent or approval should state explicitly that conditions may be attached to such consent or approval e.g. the following articles: 11(2) (street works), 14(4) (power to alter layout, etc. of streets), 15(2) (temporary closure of streets and public rights of way and permissive paths), 17(1)(b) (access to works), 22(5) (authority to survey and investigate the land), 50(2) (traffic regulation), and 51(4) (felling or lopping).	Article 55(3) (Procedure regarding certain approvals etc) is clear that where such consent, agreement or approval is granted under this DCO, it will be subject to the same appeal procedure as the requirements including where a condition to which the undertaker objects is included.
15.25	Article 19(1)(b) (agreements with street authorities)	<p>This provision allows the street authority and undertaker to enter into agreements with respect to “the maintenance of the structure of any bridge or tunnel carrying a street over or under an electric line authorised by this Order.” SCC’s concerns regarding the Applicant’s proposals for the Benhall Bridge have been set out elsewhere in this Local Impact Report. Those concerns are not repeated here; suffice to say that, in the light of them, and particularly for safety reasons, SCC considers that no works should be carried out on the Benhall Bridge (or the approaches to it) without the consent of SCC, or without an agreement being entered into in respect of those works. It will be noted that article 23(3) (agreements with street authorities) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) prohibits the undertaker from commencing certain works prior to the Applicant entering into a highways side agreement under article 23 with the highway authority. A similar approach should be followed here. SCC would therefore propose the inclusion of a new paragraph after paragraph (1) of article 19 which states –</p> <p>“(1A) The undertaker must not commence Work No.3A (access road to the Suffolk Converter Station) prior to entering into an agreement with respect to it pursuant to this article with the street authority”.</p>	<p>The Applicant notes that it has submitted a change request Application Document 9.76.2 (A) Change Request Report [CR1-052] which amends the Order Limits around the Benhall Bridge. In any event, the suggested adjustment to Article 19 does not seem appropriate as Article 19 simply sets out provision that the street authority and the undertaker may enter into agreements.</p> <p>If the change application is accepted by the Examining Authority, Article 11(1) (street works) and corresponding Schedule 5 would apply to Benhall Bridge. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project and the various options in the change request relating to Benhall Bridge are appropriately managed and mitigated.</p>
15.26	Article 33(1) (time limit for exercise of authority to acquire land and rights compulsorily)	SCC considers allowing the Applicant seven years to issue ‘notices to treat’ or a ‘general vesting declaration’ to acquire the land or rights that is subject to the power of compulsory purchase is excessive. Five years is the usual position, and SCC considers the usual position should be adopted here, especially since (per article 33(4)) that period will not be eaten into by any legal challenge to the decision to grant development consent for the project. Moreover, per requirement 2(1) (time limits) the undertaker has five years to commence the authorised development, and SCC would usually expect this period to be the same as that in article 33(1).	<p>The time limit of five years set out in requirement 2 relates to the timing for the authorised development to be commenced. However, Article 33 (Time limit for exercise of authority to acquire land compulsorily) relates to the time period for land to be compulsorily acquired. The Applicant does not consider that the two periods should be the same as they relate to different points.</p> <p>Justification for the seven year period is found in Application Document 4.2 (E) Statement of Reasons ([REP1-040]) which provides further detail on compulsory acquisition and time limits.</p>
15.27	Article 50(4) (traffic regulation)	This provision refers to the “instrument” made under paragraph (1) or (2) of article 50. SCC considers it would be helpful if a copy of the made instrument were made available by the undertaker and sent to SCC. In the light of this, SCC would suggest the inclusion of a new article 50(10), drafted as follows – “(10) A copy of the instrument referred to in paragraph (4) must be held at the registered office address of the undertaker for inspection during normal working hours and, as soon as reasonably practicable after being made, a copy must be served on the highway authority”.	The Applicant understands the rationale for this additional wording and will consider whether this drafting point can be included in the next iteration of the draft DCO which will be submitted at Deadline 3.
15.28	Article 51 (felling or lopping)	SCC is concerned that important hedgerows under the Hedgerow Regulations 1997 are included in this article without any provision for special consideration to minimise impacts, for example by using HDD or coppicing and temporary storage	Important Hedgerows are assessed in the Suffolk Ecology and Biodiversity Chapter and there are measures in the Register of Environmental Actions and Commitments relating to them, notably measure B31. Important Hedgerows are

Reference	Matter	Point Raised	Applicant's Comments
		prior to replanting, instead of removal. In any event, SCC notes the following from Advice Note Fifteen: drafting Development Consent Orders: "...the Article should include a Schedule and a plan to specifically identify the hedgerows to be removed (whether in whole or in part). This will allow the question of their removal to be examined in detail. Alternatively, the Article within the DCO could be drafted to include powers for general removal of hedgerows (if they cannot be specifically identified) but this must be subject to the later consent of the local authority" (paragraph 22.1).	mapped in Application Document 6.4.2.2.A (B) ES Figures Suffolk Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) CONFIDENTIAL [AS-028] .
15.29	Article 51 (felling or lopping)	Regarding "a plan to specifically identify the hedgerows to be removed," while the Applicant has prepared "Trees and Hedgerows to be Removed or Managed Plans" it is not clear those plans apply to all hedgerows or important hedgerows to be removed, and SCC would welcome clarification on this point.	The plans include all hedgerows, including Important Hedgerows. Important Hedgerows are mapped in Application Document 6.4.2.2.A (B) ES Figures Suffolk Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) CONFIDENTIAL [AS-028]
15.30	Article 51 (felling or lopping)	Regarding consent, only trees "within or overhanging the extent of the public highway" (and not those included in the "Trees and Hedgerows to be Removed or Managed Plans") are subject to consent. Depending on the confirmation received in respect of the point mentioned above, SCC might seek the amendment of this article to include a more general consent provision.	The Applicant notes that SCC will consider this further.
15.31	Article 52 (trees subject to tree preservation orders)	By section 206(1)(a) of the Town and Country Planning Act 1990, where a tree for which a tree preservation order is in place is removed, uprooted or destroyed in contravention of the order, the landowner must plant another tree of an appropriate size and species at the same place as soon as he reasonably can. Article 52(3) of the dDCO disapplies section 206(1). SCC considers this disapplication must be justified in the EM [AS-090]. Moreover, SCC considers arrangements should be made in the dDCO or in a control document to replace each tree that is lost at a ratio of three for one, and that suitable locations for these re-placement tree must be found.	<p>The Applicant will include justification for the disapplication of section 206(1)(a) of the Town and Country Planning Act 1990 in the next iteration of the Explanatory Memorandum which will be submitted at Deadline 3.</p> <p>The Applicant does not believe that the requirement of a 3:1 replacement planting has been raised before. This requirement has not been mentioned during any of the arboricultural or landscape thematic meetings and is not identified within SCC or ESC planning policy.</p> <p>The total area of canopy cover recorded by the tree survey is 709,821m² and the extent of canopy loss due to tree removal equates to approximately 47,903m². Therefore, the final extent of tree loss equates to approximately 6.74% of the surveyed canopy cover area (m²). However, as identified in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059], there would be a long-term net increase in woodland habitat due to the Suffolk Onshore Scheme with a total area of 214,931 m². The Proposed Project therefore forms an opportunity to significantly increase the canopy cover within the Order Limits with the number of trees planted being in excess of the three for one ratio requested.</p>
15.32	Schedule 1 (authorised project)	SCC considers that each of Work Nos. 1 to 5 should including soft landscaping.	This comment was addressed within Tables 2.1.17 of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
15.33	Schedule 3 (requirements) (paragraph 1 (interpretation))	In paragraph 1(1), the definition of "authorised development" is not needed because the term is already defined in article 2 (interpretation) which states the definition applies to the (whole) Order, which includes Schedule 3. A similar point applies to the definition of "limits of deviation," which is included in article 2 and paragraph 1(1) of Schedule 3. (The definitions here are slightly different: the one in article 2 refers to the limits "shown on the Works Plans" while the one in Schedule 3 does not).	The Applicant will review the definitions for consistency in the next iteration of the draft DCO which will be submitted at Deadline 3.

Reference	Matter	Point Raised	Applicant's Comments
15.34	Schedule 3 (requirements) (paragraph 1 (interpretation))	Paragraph 1(1) defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. The definition is circular and unhelpful. Requirement 4 (construction management plans) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions ⁵⁶ and one of the six tests for conditions is precision ⁵⁷ . SCC consider the inclusion of “discharging authority” in requirement 4 creates imprecision and requests that the Applicant recasts requirement 4 so that the body they want to be involved in requirement 4 is named. A similar drafting approach has been followed in the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and that drafting has already caused confusion post-consent for SCC. SCC is keen to avoid any confusion in respect of this Order.	<p>The definition of ‘discharging authority’ is deliberately drafted to not name specific authorities or bodies given the different geographies and authorities involved in the Proposed Project. It is not the usual approach to name specific bodies in the draft DCO and such an approach is well-precedented by other development consent orders and should remain as drafted.</p> <p>However, the Applicant recognises that certainty is required by all parties over which bodies are defined as a discharging authority. The Applicant will work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified.</p> <p>The Applicant will review the definitions to check whether any amendments can be made for clarity in the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.</p>
15.35	Schedule 3 (requirements) (paragraph 1 (interpretation))	Paragraph 1(1) defines “start-up and close down activities”. Two drafting points: (1) No hyphen is used in “start up and close down activities” in requirement 7(5) and there should be consistency in the drafting and (2) Since this term is only used in requirement 7(5), the definition should be moved to that requirement after paragraph (6) i.e. in the same way that “controlled waters” is defined at the end of requirement 10(3) (contaminated land and controlled waters).	The Applicant will consider this drafting point in the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3
15.36	Schedule 3 (requirements) (paragraph 1 (interpretation))	Because certain requirements provide for the approval or agreement of the relevant highway authority (for example requirement 7(3) (construction hours) and requirement 8(3) (highway works), paragraph 1(2) should be amended as follows – “(2) Where under any of the Requirements the approval or agreement of the relevant highway authority or the relevant planning authority is required, that approval or agreement must be given in writing”.	The Applicant will consider this drafting point in the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
15.37	Schedule 3 (requirements) (requirement 2(2) (time limits))	A drafting point. SCC consider this provision should be amended as follows – “If any proceedings are begun to challenge the validity of this Order, the period specified in sub-paragraph (1) is extended by a period equivalent to the period beginning with the day the application to challenge is made and ending on the day it is withdrawn or finally determined”.	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3
15.38	Schedule 3 (requirements) (requirement 3 (converter station design))	Requirement 3 refers to “the Key Design Principles set out in the Converter Station Design Principles”. What is the status of the documents which include the Design Principles (Suffolk: [APP-366], Kent: [APP-367])? Neither is referred to elsewhere in the dDCO and SCC would suggest they should be defined and included in the schedule of certified documents. SCC would therefore suggest that existing requirement 3 is renumbered paragraph (1) and a new paragraph (2) is included in requirement 3 which includes a definition of the document e.g. – “(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60	<p>Please see the response provided above in relation to reference 5.89-5.90.</p> <p>The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3</p>

Reference	Matter	Point Raised	Applicant's Comments
		(certification of documents) by the Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order”.	
15.39	Schedule 3 (requirements) (requirement 3 (converter station design))	In Schedule 19 (certified documents) to the dDCO, “Design Principles – Suffolk” and “Design Principles – Kent” should then be added to the list of documents	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3
15.40	Schedule 3 (requirements) (requirement 4(1) (stages of authorised development))	Requires that a written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to the relevant planning authority no less than seven days prior to the date on which those pre-commencement operations are first carried out. This is included in the equivalent requirement of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958). SCC’s experience of discharging requirements under that Order has shown the time period to be too short. In the light of this, SCC requests that the 7-day period is increased to 35 days. This point is touched on again in paragraph 15.43 below.	A response is provided at 15.44 below.
15.41	Schedule 3 (requirements) (requirement 4(4) (stages of authorised development))	Provides for notice of the completion of each stage of the authorised development to be given to the relevant planning authority within 28 days of the event occurring. SCC does not understand why it should take a month for this information to be provided and considers it should be provided in less time. For example, 14 days is the period stated in the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958)	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
15.42	Schedule 3 (requirements) (requirement 5 (construction management plans))	SCC considers this provision could be drafted more concisely, for example – “(1) All construction works forming part of the authorised development must be carried out in accordance with the Greenhouse Gas Reduction Strategy and the Red Throated Diver Protocol, unless otherwise agreed with the relevant planning authority. (2) All pre-commencement operations must be carried out in accordance with the documents named in sub-paragraph (1) and the outline management plans listed in paragraph 6(1) below, unless otherwise agreed with the relevant planning authority”	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
15.43	Schedule 3 (requirements) (requirement 5 (construction management plans))	If the Applicant considers another “discharging authority” should have a role in discharging this requirement, that authority should be named in the requirement.	See the response to 15.34 above.
15.44	Schedule 3 (requirements) (requirement 5(3) (construction management plans))	As mentioned in paragraph 15.39 above, SCC considers that the requirement – under requirement 4(1) (stages of the authorised development) – for notifications for pre-commencement works to be submitted seven days prior to those works taking place is an unreasonably short period of time. Requirement 5(3) states that pre-commencement operations must be carried out in accordance with the outline management plans listed in Requirement 6(1). The set of activities permitted under the definition of “precommencement activities” and the outline management plans is extensive. The relevant authority receiving a pre-commencement notification does not have time to ensure that the pre-commencement notification is valid and the activities are being undertaken in accordance with the outline management	The Applicant notes that Requirement 4(1) requires a written notice to be provided no less than seven days prior to the date of the first pre-commencement operations. The Applicant considers that the obligation is to provide a notification only and there therefore is no requirement for the relevant authority to take any further action within those seven days. It is not correct that there is no option for recourse should the pre-commencement operations not satisfy the requirements of the Application Document 3.1(E) draft Development Consent Order [REP1-036] , noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008.

Reference	Matter	Point Raised	Applicant's Comments
		plans. There is no option for recourse if the pre-commencement activities do not satisfy the requirements of the DCO after the seven-day period has expired. A longer period of 35 days would be preferable.	
15.45	Schedule 3 (requirements) (requirement 6(1) (construction management plans to be approved))	Again, for clarity, the reference to “or other discharging authority as may be appropriate to the relevant plan” should be replaced with the name of the authority the Applicant has in mind. For instance, the subject matter of the following documents fall within SCC’s statutory responsibilities, and it would be appropriate for SCC to approve these – (c) Construction Traffic Management and Travel Plan – Suffolk (which must besubstantially in accordance with the Outline Construction Traffic Management and Travel Plan – Suffolk). (k) Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk). (q) Material and Waste Management Plan. (r) Drainage Management Plan; and (s) Flood Management Plan	See the response to 15.34 above.
15.46	Schedule 3 (requirements) (requirement 6(1) (construction management plans to be approved))	In respect of the documents mentioned in sub-paragraphs (q), (r) and (s), it is not clear why no outline document is being provided. No explanation is provided in the EM [AS-090] at paragraph 5.3.10 (which concerns requirement 6).	The documents referred to are not submitted in outline as the final versions have already been prepared. The Applicant will consider adding additional detail to clarify this point in Application Document 3.2 (D) Explanatory Memorandum [REP1-038] which will be submitted at Deadline 3.
15.47	Schedule 3 (requirements) (requirement 7 (construction hours))	This provision needs significant reworking in order to allow for community respite. For example, SCC considers Saturday hours should be between 08:00 and 13:00 and there should be no working on Sundays and Bank Holidays. The Secretary of State considered a similar approach appropriate in the East Anglia ONE North Offshore Wind Farm Order 2022 (S.I.2022/432). Requirement 24 of that Order states the core hours are “between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays”, subject to certain exceptions listed in sub-paragraph (2). SCC’s proposed amendments to requirement 7 include the following.	The Applicant notes the concerns set out by SCC regarding the construction working hours. The Applicant does not consider that it is necessary to amend the drafting of Application Document 3.1(E) draft Development Consent Order [REP1-036] for the reasons set out in the Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
15.48	Schedule 3 (requirements) (requirement 7 (construction hours))	Requirement 7(1) should be amended as follows – “Subject to sub-paragraphs (2), (3) and (4) work may only take place between the hours of 07.00 and 19.00 Monday to Friday and between 08.00 and 13.00 on Saturdays, unless otherwise approved by the relevant planning authority”.	
15.49	Schedule 3 (requirements) (requirement 7 (construction hours))	Requirement 7(2) should be recast as follows – “No percussive piling works may take place outside of the hours of 07.00 to 19.00 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant planning authority.”	
15.50	Schedule 3 (requirements) (requirement 7	Requirement 7(3) should be recast as follows – “Subject to sub-paragraphs (4), no HGV deliveries may be made to site outside of the hours of 07.00 to 19.00 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant highway authority”.	

Reference	Matter	Point Raised	Applicant's Comments
	(construction hours))		
15.51	Schedule 3 (requirements) (requirement 7 (construction hours))	Requirement 7(4)(a) should be omitted.	<p>Requirement 7(4)(a) refers to trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses.</p> <p>The Applicant cannot omit this part of the requirement as trenchless crossing operations require working outside of core hours in case the drilling operation cannot be safely stopped or to avoid the risk of the bore collapsing if the work is halted at a certain stage.</p>
15.52	Schedule 3 (requirements) (requirement 7 (construction hours))	<p>Requirement 7(4)(g) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. For example, requirement 7(3)(g) of the Bramford Order states –</p> <p>“(3) The following operations may take place outside the core working hours referred to in sub-paragraph (1)—</p> <p>...</p> <p>(g) 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>”; [Words not included in the instant dDCO [AS-088] shown bold and underlined].</p>	<p>The Applicant acknowledges that the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 contains additional details. However, in the context of the Proposed Project, the Applicant does not consider that it is possible to amend the drafting of t Application Document 3.1(E) draft Development Consent Order [REP1-036] and refers to the justification for the construction hours contained in the Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
15.53	Schedule 3 (requirements) (requirement 7 (construction hours))	SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the instant dDCO [AS-088].	
15.54	Schedule 3 (requirements) (requirement 7 (construction hours))	Requirement 7(5) is less detailed than the equivalent provision of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. For example, requirement 7(4) of the Bramford Order states –	<p>The Applicant acknowledges that the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 contains additional details. However, in the context of the Proposed Project, the Applicant does not consider that it is possible to amend the drafting of Application Document 3.1(E) draft Development Consent Order [REP1-036] and refers to the justification for the construction hours contained in the Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043].</p>
15.55	Schedule 3 (requirements) (requirement 7 (construction hours))	“The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. <u>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</u> ”.	
15.56	Schedule 3 (requirements) (requirement 7 (construction hours))	SCC considers the bold and underlined text (which SCC requested should be included in the Bramford DCO) should be included in the instant dDCO [AS-088].	
15.57	Schedule 3 (requirements) (requirement 8(1))	This provision refers to an Arboricultural Method Statement, which must be submitted to and approved by the relevant planning authority before any stage of the authorised development can commence. Can an outline version be submitted	The provision of an outline Arboricultural Method Statement during examination is considered premature due to the detailed design not being fully developed. Based on precedent from other DCO applications this is not a document typically

Reference	Matter	Point Raised	Applicant's Comments
	(retention and protection of existing trees and hedgerows)	to examination? (No explanation for its absence is included in the EM [AS-090] (paragraph 5.3.16, which concerns requirement 8).	submitted at the application or examination stages. Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] includes arboricultural control measures A01-A04 to guide any post consent Arboricultural Method Statement.
15.58	Schedule 3 (requirements) (requirement 9(2) (reinstatement schemes))	This provision states – “The requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development”.	The Applicant will consider this drafting point for the next iteration of the Application Document 3.1(E) draft Development Consent Order [REP1-036] and Application Document 3.2 (D) Explanatory Memorandum [REP1-038] which will be submitted at Deadline 3
15.59	Schedule 3 (requirements) (requirement 9(2) (reinstatement schemes))	It would be helpful if the EM [AS-090] could explain why this provision is needed. Currently, no explanation is given (paragraph 5.3.17 concerns requirement 9).	
15.60	Schedule 3 (requirements) (requirement 10(1) (contaminated land and controlled waters)	This provision states – “If during any stage of the authorised development, contamination within the Order Limits is identified as a result of the confirmatory ground investigations, and this contamination is considered likely to cause a significant possibility of significant harm to persons or pollution of controlled waters or the environment then, except in the case of emergency, no further development in the vicinity of the contamination may be carried out until a written scheme to identify the extent of the contamination and identify mitigation and remedial measures to be taken to render the land fit for its intended purpose has been submitted to and approved by the relevant local planning authority, following consultation with the Environment Agency”.	The Applicant will consider this drafting point in the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
15.61	Schedule 3 (requirements) (requirement 10(1) (contaminated land and controlled waters)	The equivalent provision of the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (SI 2024/393) – requirement 12 – refers to contamination which is “considered to present a significant possibility of significant harm to persons ...”. Is there a difference between “considered to present a significant possibility” and “considered likely to cause a significant possibility”? Why has the drafting been changed here?	
15.62	Schedule 3 (requirements) (requirement 10(2) (contaminated land and controlled waters)	SCC considers the following drafting amendment is required here – “Should mitigation or remedial measures be required then they must be carried out in accordance with the approved scheme referred to in sub-paragraph (1) and, if remedial measures are required, their implementation and validation must be documented in a verification report submitted to the relevant planning authority”.	The Applicant will consider this drafting point for the next iteration of the Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3.
15.63	Schedule 3 (requirements) (requirement 12(1) (highway works))	This provision refers to the “local highway authority,” an undefined term. SCC assumes the term should be the “relevant highway authority,” which is defined in article 2(1) (interpretation). (“Relevant highway authority” is also the term used in requirements 1(4) (interpretation) and 12(3) (highway works).	The Applicant will consider this drafting point for the next iteration of Application Document 3.1(E) draft Development Consent Order [REP1-036] which will be submitted at Deadline 3
15.64	Schedule 3 (requirements) (requirement 13(1) (decommissioning))	This provision provides for the decommissioning of the authorised development, save for substations. What will happen to the substations? (Paragraph 5.3.21 of the EM [AS-090], which concerns requirement 13 does not explain).	This comment was addressed within Tables 2.1.17 of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] . Substations are anticipated to remain part of the network where appropriate. For example, Kiln Lane substation in Suffolk would

Reference	Matter	Point Raised	Applicant's Comments
			facilitate two SPR projects, as well as Sea Link. Therefore, any approach to decommissioning may differ from other assets.
15.65	Schedule 3 (requirements) (requirement 14(1) (archaeology))	This provision names “the relevant planning authority” as the discharging authority. In Suffolk, SCC should be the discharging authority because archaeology is a county function. This approach is precedented. For instance, requirement 3 (project wide: archaeology and peat) of the Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853) names SCC as the approving authority for archaeological matters.	See the response to 15.34 above.
15.66	Schedule 3 (requirements) Emergency Planning Arrangements	SCC has a statutory duty under Radiation Emergency Preparedness and Public Information Regulations 2019 (REPIR 19) to consider the impacts of the development with respect to the existing contingency arrangements contained in the Sizewell B Off-site Radiation Emergency plan.	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. 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 SCC's Emergency Planning team early in 2026 to commence this process
15.67	Schedule 3 (requirements) Emergency Planning Arrangements	The Sea Link network sits outside the Sizewell B nuclear power station Detailed Emergency Planning Zone (DEPZ – approx. 4.5km), but within the existing Extended and Outline Emergency Planning Zone (EOPZ – 15km and OPZ – 30km). The Sizewell B radiation emergency planning assumptions assumes that following an Off-Site Nuclear Emergency (OSNE), immediate action to protect the public will be required within 12hrs for those within the EOPZ.	This comment was addressed within Tables 2.1.17 of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043] .
15.68	Schedule 3 (requirements) Emergency Planning Arrangements	Before construction commences the Applicant will need to develop emergency planning measures to respond to an emergency at the Sizewell B nuclear power station. To achieve this, the Applicant will need to liaise directly with the SCC Duty Holder for off-site radiation emergency arrangements. The measures will need to cover arrangements for protecting construction staff across all locations during a radiation emergency and show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.	
15.69	Schedule 3 (requirements) Emergency Planning Arrangements	The EA1N and EA2 DCOs include Requirement 33 – Emergency Planning Arrangements which obliges the promoters to submit an Emergency Plan to be approved in accordance with the relevant Radiation Emergency Preparedness Regulations before construction of onshore works can commence. Wording similar to this requirement could be used for the Sea Link DCO given the similarities in contexts for the purposes of emergency planning in relation to Sizewell B. Requirement 33 of the EA1N and EA2 DCOs reads as follows:	
15.70	Schedule 3 (requirements) Emergency Planning Arrangements	33.—(1) No part of the relevant works shall commence until the Suffolk Resilience Forum Radiation Emergency Plan has been reviewed to account for the relevant works or part thereof and reissued in accordance with the relevant Radiation Emergency Preparedness Regulations. (2) Emergency planning arrangements specified within the Suffolk Resilience Forum Radiation Emergency Plan in respect of the relevant works shall be implemented in relation to the relevant part of the relevant works, unless otherwise agreed with Suffolk County Council after consultation with the Sizewell Emergency Planning Consultative Committee or Suffolk Resilience Forum as appropriate. (3) For the purposes of this requirement— (a) “the relevant works” means— (i) the onshore preparation works; (ii) the onshore works; and (iii) to the extent that they are within the Sizewell B Detailed Emergency Planning Zone, the offshore works.	

Reference	Matter	Point Raised	Applicant's Comments
		(b) “the relevant Radiation Emergency Preparedness Regulations” means the Radiation (Emergency Preparedness and Public Information) Regulations 2019(a) as amended from time to time; and (c) “the relevant Sizewell B Detailed Emergency Planning Zone” means the Sizewell Detailed Emergency Planning Zone detailed within the Suffolk Resilience Forum Radiation Emergency Plan.	
15.71	Schedule 4 (discharge of requirements) (paragraph 1, timescales)	The timescales in Schedule 4 are too short and should be changed so that they are, at the very least, no shorter than those set out in Advice Note Fifteen: drafting Development Consent Orders. The EM [AS-089] justifies the shorter timescales as follows – “Whilst it is acknowledged that the time limits included in Schedule 4 (in relation to the determination of applications made pursuant to the Requirements and any requests made by the relevant discharging authority for further information) do differ from the 42 day period which is recommended in Appendix 1 of Advice Note 15, National Grid considers that shorter time limits are necessary and proportionate in light of the immediate and pressing national need which the project is intended to address. These shorter time limits are preceded in other made Orders including the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024”. (paragraph 5.4.2).	The Applicant acknowledges these comments regarding the timescales in Schedule 4 of the Application Document 3.1(E) draft Development Consent Order [REP1-036] . However, the Applicant considers that the time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) 2024. However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.
15.72	Schedule 4 (discharge of requirements) (paragraph 1, timescales)	This argument is unconvincing. The 35-day decision-making period in paragraph 1(1) of Schedule 4 (compared to the 42-day period in paragraph 1(2) of Appendix 1 to Advice Note Fifteen) is unlikely to affect “the immediate and pressing national need which the project is intended to address”. It will be noted that a longer period than 35 days has been considered appropriate for other Suffolk-based energy NSIPs, which are Critical National Priority Infrastructure: (i) Sizewell C (Nuclear Generating Station) Order 2022(SI 2022/853) – 6 weeks (i.e. 42 days), and 8 weeks (i.e. 56 days) if there are named consultees: paragraph 1 of Schedule 24 (ii) East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432) – 56 days where no further information is requested and 42 days where further information is requested: paragraph 1 of Schedule 16 and (iii) East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433) – 56 days where no further information is requested and 42 days where further information is requested: paragraph 1 of Schedule 16. Furthermore, the time for determining applications for the discharge of requirements under the Sunnica Energy Farm Order 2024 (SI 2024/802) is 56 days (paragraph 2 of Schedule 13).	
15.73	Schedule 4 (discharge of requirements) (paragraph 1, timescales)	While SCC will ensure that any request for approval will be dealt with as quickly as possible, it will be remembered that SCC will be receiving a considerable number of requests for approval across several nationally significant infrastructure projects. A 42-day decision-making period would be challenging in this context; the reduction of the timeframe to 35 days is unrealistic and potentially detrimental to the effective consideration of requests. Owing to these circumstances, SCC consider a 56-day decision-making period would be reasonable.	Please see the comments below.
15.74	Schedule 4 (discharge of requirements) (paragraph 1, timescales)	Paragraph 5.4.3 of the EM [AS-089] says this schedule is “based on Schedule 4 of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 ...”. The equivalent period in the Bramford Order is 35 days. SCC’s experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. For example, in SCC’s experience, the provision of 35 days, as opposed to 56 days, has been counterproductive to the prompt delivery of energy infrastructure projects. 56 days allows the	The Applicant acknowledges these comments regarding the timescales for discharge of requirements in Schedule 4(1) of Application Document 3.1(E) draft Development Consent Order [REP1-036] . However, the Applicant considers that the time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

Reference	Matter	Point Raised	Applicant's Comments
		discharging authority to ensure that consultees, including statutory consultees, respond within the decision period with enough time for any objections to be resolved with the Applicant. When the decision period is only 35 days, SCC has found that there is insufficient time for objections to be resolved resulting in extensions of time being agreed or applications being rejected. In either case, the Applicant's delivery programme is compromised due to delay. On occasion, this has resulted in Applicants rushing to make amendments which do not address the issues raised, resulting in further amendments needed to allow the requirement to be discharged. This sometimes leads to the decision period being extended beyond 56 days. SCC has not encountered this problem where it has 56 days to decide applications which rarely, if ever, require extensions of time. Therefore, SCC considers that a decision period of 56 days to be more conducive than 35 days to the delivery of critical energy infrastructure.	However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.
15.75	Schedule 4 (discharge of requirements) (paragraph 2, further information)	SCC considers the provisions for requesting further information to be insufficient. As drafted, the discharging authority is permitted only 7 days to request further information otherwise it is considered to have sufficient information. This is an unreasonable burden to place on the discharging authority. Deciding whether further information is needed requires an extensive review of the submitted documents by officers of various technical disciplines which is simply unfeasible to complete in 7 days. The Order makes provision of 35 days to decide applications, the bulk of which is spent reviewing the submitted documents to reach a conclusion of whether they fulfil the obligations set out in the requirement. It is only once the documents have been thoroughly reviewed that it can be decided whether an application includes sufficient information for the requirement to be discharged. There is no limit to how many applications can be submitted to a discharging authority at once meaning it is possible for the discharging authority to be expected to review multiple applications amounting to hundreds of pages of technical detail in just 7 days. Therefore, SCC considers a more reasonable time limit of 21 days would give the discharging authority adequate time to decide whether an application contains sufficient information.	The Applicant acknowledges these comments regarding the timescales for requesting further information in Schedule 4(2) of Application Document 3.1(E) draft Development Consent Order [REP1-036] . However, the Applicant considers that the time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.
15.76	Schedule 4 (discharge of requirements) (paragraph 3, fees)	The first point to make is that while SCC will be required to deal with applications for consent under articles and under requirements, by paragraph 3(1) of Schedule 4, a fee is only payable in respect of requirements. SCC considers that fees should also be paid for dealing with applications under articles and requirements. SCC's approach here is consistent with the standard drafting for a provision dealing with procedure for the discharge of approvals, as set out in Appendix 1 to PINS Advice Note 15, which concerns drafting DCOs.	The Applicant acknowledges these comments regarding the payment of fees relating to applications for consent of Application Document 3.1(E) draft Development Consent Order [REP1-036] . However, the Applicant notes that the approach taken has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024. However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time.
15.77	Schedule 4 (discharge of requirements) (paragraph 3, fees)	The second point to make is that the proposed fee is unreasonably low. Paragraph 3(1) says a fee must be paid as follows – "(a) such fee as may be prescribed (under sections 303 and 333(2A) of the 1990 Act for the discharge of conditions attached to a planning permission); or (b) a fee of £145 per request".	The fee proposed of £145 aligns to the fee levied for the discharge of a planning condition on a Town and Country Planning Act application for 'other developments' as correct in February 2025 (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment)

Reference	Matter	Point Raised	Applicant's Comments
15.78	Schedule 4 (discharge of requirements) (paragraph 3, fees)	Regarding (a), this is an application for a nationally significant infrastructure project under the Planning Act 2008, not for (say) a garage extension under the TCPA 1990. The fee should reflect the work involved.	Regulations 2023). This fee applies to conditions for major applications, with material similar to that to be submitted to discharge requirements.
15.79	Schedule 4 (discharge of requirements) (paragraph 3, fees)	Turning to (b), £145 per application is lamentably and unreasonably low. If we assume an hourly rate of £100 for an officer to deal with this work, the fee under (b) would mean the officer would have to deal with any discharge application within around 90 minutes before dealing with the application started to cost the local authority money. It is unlikely that any application will be capable of determination within that period. While the Council cannot make a profit for this work, it is reasonable for it to seek the full recovery of the actual costs incurred. The Applicant's approach here is wholly unfair.	However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time. The Applicant anticipates that the proposed PPA will make provision for the reimbursement of any additional reasonable financial costs which are likely to be properly incurred by the Councils in respect of the consideration and determination of any requests for approval, consent or agreement made pursuant to the DCO.
15.80	Schedule 4 (discharge of requirements) (paragraph 3, fees)	This is not only about fairness but also about the way in which the Order is drafted. For example, by paragraph 1 of Schedule 4, the Council will have 35 days to make its decision on any application and if no decision is made within that period, consent will be deemed to have been granted. The same applies in respect of consents sought under articles. Dealing with any application for consent under this Order will therefore be a matter of high priority for SCC, diverting officer resource from other matters. The inclusion of the deeming provision and its effects on SCC resourcing is another reason SCC considers its full costs for this work should be covered by the Applicant.	
15.81	Schedule 4 (discharge of requirements) (paragraph 3, fees)	Rather than the regime currently proposed in the Order, SCC considers it would be preferable if the Applicant and SCC entered into a planning performance agreement ("PPA") for the full recovery of SCC's costs in discharging any application under the Order.	

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