



**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

Document 9.35.2: Applicant's Comments on Local Impact Report from East Suffolk 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 East Suffolk 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 East Suffolk Council [REP1-128]** has been structured into eight chapters with a supporting Appendix A. The Applicant has reviewed and provided comments on Chapters 2-8 and Appendix A as presented in Tables 2.1 – 9.1. 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 Chapter 2: ESC’s Pre-application Engagement with the Applicant

### 2.1 Introduction

2.1.1 This section provides the Applicant’s comments on Chapter 2: ESC’s Pre-application Engagement with the Applicant.

### 2.2 Comments Table

Table 2-1 Applicant’s Comments on Chapter 2: ESC’s Pre-application Engagement with the Applicant

Reference	Matter	Point Raised	Applicant’s Comments
<b>2.1 Statutory Consultation</b>			
2.1.1	Pre-app engagement with ESC	As alluded to in ESC’s recent response to the Adequacy of Consultation (held 28 <sup>th</sup> March – 11 <sup>th</sup> April 2025) [AoC-006], ESC remains disappointed by the lack of genuine engagement undertaken to date by the Applicant. What were intended to be helpful and meaningful contributions by ESC provided throughout the pre-application stage do not appear to have been positively taken on board, and in some respects have been ignored.	<p>While the concerns and frustrations expressed here are noted, the Applicant does not agree with the assertion that engagement has been inadequate.</p> <p>The Applicant recognises the Council’s experience in dealing with major infrastructure projects and has valued its contributions to date; however, it is felt that the level of and approach to engagement has been appropriate and proportionate to the needs of the Proposed Project, and has indeed been extensive over a number of years.</p>
2.1.2	Pre-app engagement with ESC	ESC is of the view that its involvement to date has been largely dismissed. This undervalues the positive contributions made by all those involved on behalf of the communities ESC serves, and is in direct conflict with the underlying ethos of the Nationally Significant Infrastructure Project (NSIP) pre-application process.	<p>Where the need for focused discussion on technical matters has arisen there has been constructive and positive dialogue with ESC (and often combined with Suffolk County Council), as evidenced in the Statement of Common Ground.</p>
2.2.3	Pre-app engagement with ESC	The ExA should be aware that ESC raised concerns with the Applicant in relation to the depth and quality of engagement on a number of occasions throughout the project during the pre-application stage. Although the higher-level project overview meetings on Sea Link were scheduled regularly, detailed engagement on a technical level was extremely limited. Ahead of the statutory consultation, ESC would have expected technical officers to be regularly engaged in all the thematic areas, but this was not the case. Whilst a limited number of meetings were held with technical officers, these were insufficient in number and depth and ESC has not been given the opportunity to feed into the assessments and preliminary environmental information. In relation to some vitally important topic areas, including coastal processes, ecology, surface water drainage and flood risk, and air quality, there has been virtually no engagement. Of equal importance, it was emphasised that engagement with the local communities is also essential and should be a key feature of the pre-application phase – which unfortunately was also not the case.	<p>Similarly, extensive community engagement and consultation has been undertaken over many years. This is presented in detail in <b>Application Document 5.1 Consultation Report [APP-301]</b>.</p> <p>The Applicant disagrees that input has been ignored or that detailed engagement has not taken place. There are occasions where ESC has requested design changes or additional commitments that the Applicant has not agreed to, as there is on all projects; the Applicant has communicated honestly and thoroughly on those matters.</p>
<b>2.2 Additional Consultation and Engagement</b>			
2.2.1	Public questions / concerns	As part of the Additional Consultation held in the latter stages of the pre-application phase, ESC highlighted to the Applicant that there were several recurring themes of questions from the public, including requests for more information about the proposed River Fromus crossing at the converter station site. There were also requests for design visualisations, including illustrations to better understand the	<p>The Applicant carried out consultation in accordance with the requirements of the Planning Act 2008.</p>

Reference	Matter	Point Raised	Applicant's Comments
		massing of the bridge in the landscape. Participants also noted concern at NGET's assessment of the bridge creating significant adverse effects on the setting of Grade II Listed Hurts Hall, and its setting in the landscape, together with the potential loss of ancient woodland and veteran trees.	<p>It is not unusual for the recurrence of themes at different stages on a project of this scale. The Applicant is, however, seeking to address these issues through ongoing engagement with relevant stakeholders, including meetings held in Autumn/ Winter 2025 with ESC and other stakeholders on the design of the Fromus bridge. As ESC is aware, the Applicant has been managing feedback from ESC and others requesting a lower height and the Environment Agency requesting a higher height to reach a compromise solution that presents the best option to minimise environmental and social impacts of the project. The progression of these discussions has been regularly discussed with ESC, with input sought and taken on board.</p> <p><b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050], Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</b> address these issues and include a worst-case assessment of the impact of the Proposed Project, including the Fromus River crossing, on the Grade II Listed Hurts Hall and Saxmundham Conservation Area (which includes the Grade II* Listed Church of St John the Baptist).</p> <p>The assessment concludes that in views towards Hurts Hall from the B1121, the Proposed Project (including the Fromus crossing) would result a medium impact on an asset of medium value (recognising that Hurts Hall is a Grade II Listed building), resulting in a likely 'moderate adverse' (significant) effect, reducing to 'minor adverse' (not significant) once additional mitigation planting has established at year 15.</p> <p>The design work being progressed is therefore not considered necessary in Environmental Impact Assessment terms, but the Applicant is committed to further improvement where possible and is keen to progress a design that will further reduce impacts and increase the compatibility of the bridge with its surrounding environment compared to that reported in the Environmental Statement.</p>
2.2.2	Public questions / concerns	In addition, considerable concern was expressed about the unacceptable core working hours and consequent impacts on residents' mental health and wellbeing, with several members of the public noting the presence of multiple construction projects happening in one geographical area at the same time. Questions were asked about the timing of the traffic and transport surveys taking place, noting the highly seasonal tourist economy and resultant peaks in the summer months. Concerns about fly parking and the provision of worker parking, and the potential for park and ride/car sharing schemes were also raised. Questions were raised about community benefit and compensation to the local communities affected by the construction of the project, including impacts on holiday rentals and tourist accommodation. These topics are discussed in more detail below. East Suffolk's communities have had to engage with multiple NSIPs over several years and have entirely reasonable expectations as to consultation and engagement by project promoters.	<p><i>Working hours</i></p> <p>The Applicant has considered local circumstances and previous feedback in setting proposed working hours. It is recognised that the proposed working hours are a concern for ESC and local communities but would seek to emphasise that the working hours are intended to provide flexibility to carry out works when and where needed.</p> <p>The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted.</p> <p>The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved.</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</b>, <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b>, and <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b>.</p> <p><i>Timing of traffic surveys</i></p> <p>The traffic surveys within Suffolk were carried out in January and February because this is the worst case for this type of assessment; where it is percentage change that defines the magnitude of effect. The Baseline traffic flows which have informed <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> are based on an agreed survey methodology with Suffolk County Council Highways and are considered appropriate and robust. Had higher Baseline traffic flows been adopted to account for seasonal fluctuations during the Summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported for the majority of the assessment criteria in <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b>. This would have resulted in lower levels of impact being identified and reported (except for the assessment of driver delay – see below). Therefore, no seasonal adjustments were made, as higher baseline traffic numbers would have generally been a less robust assessment scenario than lower baseline traffic numbers.</p> <p><i>Community benefits</i></p> <p>The Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this.</p>
2.2.4	Pre-app engagement with ESC	ESC warned the Applicant as it approached submission bearing in mind the government's emerging position on requiring better coordination with other Nationally Significant Infrastructure Project promoters, that in light of the Applicant's failure to engage with both ESC and the local community, ESC would have no choice but to maintain and express its negative concerns throughout the DCO Examination process which is not ESC's preferred method of responding to major infrastructure projects within the District. The completely unnecessary and entirely avoidable work now involved as a consequence of NGET's attitude simply diverts ESC's attention from the core obligations and duties that it owes to the local community.	<p>The Applicant has developed its project in a coordinated manner with (amongst other developers) NGV and SPR. This is set out in detail in <b>Application Document 7.10 Coordination Report [APP-363]</b>.</p> <p>The Applicant has, on a regular basis, attended the Energy Forum hosted by ESC and is engaging with other developers on an ongoing basis.</p>
2.2.5	Pre-app engagement with ESC	ESC highlighted that a key element in the Planning Reform Working Paper on the proposals to streamline infrastructure consenting is the introduction of a new duty on all parties to identify and narrow down areas of disagreement during the pre-application stage, reducing the number, and complexity of, substantive issues that remain unresolved going into examination and decision-making. It is clear that more could have been done by NGET during the pre-application stage but NGET seem simply to be relying on the fact that the identification of Sea Link as an Accelerated Strategic Transmission Investment (ASTI) project means that the project will be consented and can be delivered at any cost.	ESC asserts that the Applicant, in the context of the Proposed Project's status under the Accelerated Strategic Transmission Investment (ASTI) framework, is seeking to deliver the Proposed Project at any cost. This not the case. The development of the Proposed Project has been undertaken with full and robust regard to environmental assessment and the EIA process, several rounds of consultation and engagement, and an iterative options appraisal and design process over a number of years. These are presented in <b>Application Document 7.3 Design Development Report [APP-321]</b> , and <b>Application Document 5.1 Consultation Report [APP-301]</b> . However, it is important to note the NPS EN-1 policy (at paragraph 3.3.63) which states that " <i>subject</i>



Reference	Matter	Point Raised	Applicant's Comments
			<i>to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy". Therefore, while CNP projects will not be progressed at any cost, NPS policy is clear that residual effects following application of the mitigation hierarchy should in general not result in an application being refused.</i>
2.2.6	Pre-app engagement with ESC	As an example of the lack of genuine engagement offered by NGET, the limited supporting information provided at the Additional Engagement stage meant that ESC's comments were themselves inevitably limited as a result. This was particularly relevant for the Fromus crossing, where ESC had not seen visualisations of further design drawings and had to request photomontages to show the potential visual impact of the Fromus crossing in the landscape, both with and without landscape mitigation planting. This was particularly important in relation to western viewpoints to and from Hurts Hall. ESC asked for further detail and information in its response to the additional targeted consultation in summer 2024, noting that there was significant concern from members of the public about the potential impact and design of the Fromus crossing. ESC also raised the importance of a strong masterplan led design approach to the converter station site.	The Applicant believes that engagement regarding the Fromus crossing has been productive and continues to maintain engagement with relevant historic environment and landscape officers from ESC regarding the emerging design concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included engagement with the Suffolk Design Review Panel. The emerging design approach was presented in <b>Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]</b> . This document reflects ongoing discussions between the Applicant and East Suffolk and Suffolk Councils and illustrates various ways that the bridge could be developed, drawing from a detailed review of local built environment, case studies of other bridges in sensitive locations locally and further afield, and a robust analysis of the environmental and heritage setting.
2.2.7	Pre-app engagement with ESC	The Applicant had not provided the required detail regarding these topics at that time. In addition, in light of the announcement from Ofgem that National Grid Ventures' Nautilus project would be returning to a connection at the Isle of Grain in Kent, had also not addressed what this meant for the master planning approach.	The implication of Nautilus no longer coming to this area for the Applicant's approach to master planning the Saxmundham converter station site is that this is now for two structures instead of three. Details of this are captured in <b>Application Document 7.10 Coordination Document [APP-363]</b> .
2.2.8	Order Limits expansion	The Additional Engagement introduced an expansion of the Order Limits around the converter station site for drainage flexibility, though these areas of change are limited in nature and scope. ESC has continually reiterated the importance of appropriately sized Order Limits to secure both a strong masterplan led design approach and allow appropriate flexibility for the required mitigation, specifically for appropriate landscape planting.	The Proposed Project's Order Limits have been developed to provide flexibility to deliver the detailed design of all elements of the Project, including enhancement and mitigation measures. The Applicant therefore considers that the extent of the Order Limits is appropriate for the Project.
2.2.9	Drainage mitigation	ESC understands from the ExA's Section 89(3) letter [PD-006] and correspondence with the Applicant ahead of examination stating that the ExA has requested that the Applicant review the drainage mitigation proposals in light of the concerns raised by ESC and Suffolk County Council, seeking clarification as to whether there is sufficient land for drainage mitigation. ESC will continue to monitor the position over the course of the examination, seeking robust reassurances whilst working in collaboration with Suffolk County Council (SCC) as Lead Local Flood Authority (LLFA). This is discussed further in Section 6.5.6 of this LIR.	The Applicant notes this comment and will continue to work with ESC to resolve any concerns as far as possible.

### 3. Applicant's Comments on Chapter 3: ESC’s Overarching Position on Sea Link

#### 3.1 Introduction

3.1.1 This section provides the Applicant’s comments on Chapter 3: ESC’s Overarching Position on Sea Link.

#### 3.2 Comments Table

Table 33-1 Applicant’s Comments on Chapter 3: ESC’s Overarching Position on Sea Link

Reference	Matter	Point Raised	Applicant’s Comments
3.0 ESC’s Overarching Position on Sea Link			
3.0.1	ESC’s Overarching Position on Sea Link	ESC’s position on the Sea Link project at the 2023 Statutory Consultation was one of objection. This position has been maintained since that time throughout the pre-application and pre-examination process. In light of the lack of engagement by the Applicant as outlined above, ESC has no choice but to continue to object to the Sea Link project in view of the detrimental impacts that will be forced upon the local communities who will be compelled to host and neighbour the project’s onshore infrastructure.	While the Applicant recognises that there are often concerns regarding the impacts of a large DCO project such as the Proposed Project, the Applicant does not agree with this characterisation of the Proposed Project. The likely significant effects and the mitigation strategies, including on the areas referred to in the representation (landscape, the natural environment, and local communities), are presented in detail in Volume 6 Environmental Statement, while the approach to decision making in the context of any residual effects is discussed in <b>Application Document 7.1 (C) Planning Statement [AS-057]</b> .
3.0.2	ESC’s Overarching Position on Sea Link	It is clear that the Sea Link project will result in yet further unacceptable harm to the communities, environment and economy of East Suffolk over and above the other numerous infrastructure projects that have already been forced upon the local community and, as discussed later in this LIR, it is not yet considered that the need for the project is robustly proven.	The Applicant has provided detailed responses to comments related to need case, which were raised by ESC and Suffolk Energy Action Solutions in their Relevant Representations, in <b>Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]</b> .
3.0.3	Engagement with other energy scheme promoters / inter-project coordination	To compound East Suffolk’s concerns, ESC remains disappointed at the lack of any meaningful engagement by NGET with other energy scheme promoters locally with a view to identifying the sharing of opportunities to reduce cumulative impacts. It is considered that the project does not currently incorporate any genuine level of coordination with other projects as discussed in more detail below. Opportunities for coordination with other subsea cable projects proposing to make landfall in the region over the next decade have been missed, resulting in different landfall locations and cable routes being selected by separate projects leading to a greater amount of onshore infrastructure and impacts being imposed on East Suffolk’s local community and environment. This demonstrates a lack of oversight and vision from Government, and there has been no holistic action taken in the planned delivery of future energy infrastructure needs in this region. Instead, our local communities are receiving a sporadic succession of different projects coming forwards, working primarily in isolation to one another, leading to extended construction impacts over numerous years. It is precisely for this reason that the national policy statements require proper exploration of co-ordination,	<p>The Applicant does not agree with the assertion that there has been a lack of meaningful coordination in the development of the Proposed Project, and that opportunities for coordination have been missed or ignored. Evidence of the Applicant’s approach to coordination is demonstrated comprehensively in <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p> <p>Coordination with other projects and other promoters has been ongoing for several years and has materially influenced the development of the Proposed Project. The outcome of this coordination is a project that has thoroughly explored and, where feasible, delivered a range of opportunities for the reduction of impacts on the environment and host communities. These opportunities are embedded in the routing and siting decisions, the approach to design and mitigation, and in the ways that the Proposed Project might work with other developers during the delivery stages to reduce impacts on communities and the environment. In accordance with NPS EN-1 paragraph 3.3.80 and NPS EN-5 paragraphs 2.13.11, 2.14.2 and 2.15.1 (DESNZ, 2023), The Applicant has considered approaches to coordinate wherever possible with other projects at the strategic and/or project levels to reduce impacts on local communities and the environment.</p>

Reference	Matter	Point Raised	Applicant's Comments
		without which construction impacts are unacceptably extended on local residents over very significant periods.	
3.0.4	Engagement with other energy scheme promoters / inter-project coordination	<p>The main parts of the Sea Link project which could be coordinated with other proposed projects are at the co-located converter station site at Saxmundham, and there is potential for the HVAC link into the proposed Friston substation to include an element of spatial overlap with Lion Link which is understood to also include a connection from the existing electricity grid via the proposed substation in the Friston area, if consented. It is understood that NGET (Sea Link) and NGV (LionLink) are legally separate organisations, yet both fall under a common holding company with the same shareholding. In light of this, a greater degree of genuine coordination is expected. Co-location does not, however, automatically mean coordination and ESC are mindful that the financial and regulatory constraints facing the Sea Link project, being closely regulated by Ofgem, may set a precedent for other future projects whose timelines are following that of Sea Link. Indeed, colocation without coordination – as proposed here – guarantees extended construction impacts on local residents. Where realistic opportunities for inter-project coordination exist, ESC remains mindful that decisions taken at this initial project stage for Sea Link may restrict what can be achieved in terms of meaningful coordination in the future, if not sufficiently planned as part of the Sea Link project now. This has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located aspects of the projects.</p>	<p>The Applicant reiterates the point stated in these comments regarding the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) being legally separate entities. This means that NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered. This coordination has continued on a regular basis in the preparation of the application and in the Pre-Examination and Examination periods. For example, face to face and Teams meetings have been held between NGET and NGV in October-December 2025 to discuss coordination of cables at Friston to minimise environmental impact and maximise opportunities for further enhancement planting and approach to design at the Saxmundham Converter Station site. Given LionLink is not yet at statutory consultation and has not completed an Environmental Impact Assessment, details of the LionLink project cannot yet be fixed, limiting the potential for firm commitments or agreed joint plans, but the framework for coordination is set out in the Sea Link application.</p> <p>However, it should be noted that the relationship between NGET and NGV is more complex than would be experienced by two companies typically under a holding company because NGET is a regulated business and legally cannot give favourable treatment to one developer (e.g. NGV) over any other third party developer. These businesses are legally separate, with each business having no control, influence, or special insight into the activities of the other. Indeed, business separation is a requirement of the licence under which National Grid Electricity Transmission operates. This means that there <u>cannot</u> be greater coordination between the two companies than there would be with any other companies.</p>
3.0.5	Engagement with ESC	<p>As noted, ESC stressed on numerous occasions the importance of NGET carrying out genuine engagement and expressed concerns that there was limited time to consider responses properly and adapt/amend proposals accordingly. Whilst some of the details published by NGET in their project update consultation were provided partly in response to concerns raised by ESC and other stakeholders, the majority of comments and concerns raised by ESC were not addressed and therefore form the basis of the matters discussed in this LIR. This is disappointing as it means topics and concerns previously raised with the Applicant will need to be examined by the ExA, adding unnecessary workload and cost to all interested parties engaged in the examination process. These concerns have been set out in ESC's response to non-statutory consultation in 2022, statutory consultation in 2023, and additional targeted consultation in 2024, and are repeated in this response.</p>	<p>As previously stated, the Applicant does not share ESC's views that the programme of engagement for Proposed Project has been inadequate.</p> <p>The Applicant has taken on board the feedback the Council has provided and values its experience in dealing with major infrastructure projects. It is felt that the level of engagement and the approach has been proportionate to the needs of the Proposed Project. Where there has been a need for focused discussion on technical matters there has been constructive and positive dialogue with ESC and Suffolk County Council—as evidenced in the Statement of Common Ground.</p> <p>The Applicant is committed to ongoing proactive engagement with ESC in order to identify and resolve outstanding issues.</p>
3.0.6	Engagement with ESC	<p>ESC supports the Net Zero transition, but it has not to date been given the confidence that the delivery of the project as currently proposed would not result in unacceptable harm to the local environment and the existing communities. In addition, it is still not persuaded that there is a need for the project at this time – and considers the proposed delivery of the project, if consented, to be premature. Should the project be consented, however, ESC will work with the Applicant in the interests of its local communities and</p>	<p>The Applicant recognises and welcomes the ESC's acknowledgement of the importance of increasing the capability of the network to carry low carbon and renewable energy from where it is generated to homes and businesses across the country. This will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets, but also deliver a more secure and resilient energy system.</p>

Reference	Matter	Point Raised	Applicant's Comments
		environments, to secure the best outcomes possible. ESC will expect the Applicant to provide genuine levels of mitigation and compensation to offset the impacts introduced by the Sea Link project - and will expect those elements to be formally recognised by the inclusion in the Order of Requirements and/or protective provisions – as may be appropriate.	The Applicant welcomes the commitment from ESC that it is prepared to work in a productive and constructive manner with the Applicant in order to secure the best possible outcomes for the local community and environment. The Applicant is, and will continue to, maintain a positive dialogue with ESC to explore and progress positive outcomes for communities and the environment.



# 4. Applicant's Comments on Chapter 4: Sea Link Project Need Case

## 4.1 Introduction

4.1.1 This section provides the Applicant’s comments on Chapter 4: Sea Link Project Need Case

## 4.2 Comments Table 4

Table 4-1 Applicant’s Comments on Chapter 4: Sea Link Project Need Case

Reference	Matter	Point Raised	Applicant’s Comments
4.0 Sea Link Project Need Case			
4.0.7	Timing of project	The project is said to be required to transfer energy between Suffolk and Kent and to provide a transmission connection to the east of London. Having reviewed the Applicant’s submission materials, in particular the need case argument presented within Section 3 of document <a href="#">[APP-320]</a> ‘Document 7.2 Strategic Options Back Check Report’, ESC understands the broader picture requiring reinforcement of the existing transmission network infrastructure within East Anglia and the South East of England. This is due to increased demand, transporting electricity from energy generation sources to where it is needed, in line with UK Government policy in the lead up to the connection of 50GW of offshore wind by 2030 and facilitating Net Zero by 2050. ESC is not questioning that aspect of the overarching need. ESC is, however, extremely concerned as to the timing of the delivery of Sea Link and its relationship with the timing of other NSIPs being delivered within our district, in light of the anticipated onshore impacts collectively introduced.	<p>The Proposed Project is required to address needs drivers across both the East Anglia and South East, and in effect the Proposed Project will simultaneously resolve distinct issues on different parts of the network, which may take effect in either region at different times. Therefore the need for the Proposed Project does not arise only when Sizewell C and LionLink are operational. The needs case is set out in detail in <b>Application Document 7.2 Strategic Options Report Back Check [APP-320]</b>.</p> <p>Crucially, the timing of the Proposed Project is driven by obligations under its ASTI licence and to the Government objectives to deliver clean power by 2030. This means that the Applicant cannot delay the Proposed Project to align with other NSIPs over which it has no control. This would be present an unacceptable risk to the Applicant’s ASTI obligation.</p>
4.0.8	Timing of project	As highlighted in Table 3.2 – ‘Planned Generation for East Anglia’ of <a href="#">[APP-320]</a> , Sizewell C’s first reactor is due for completion in 2035, with the second following in 2036. Additionally, NGV’s LionLink interconnector project is noted within Table 3.2 as being due for completion by 2024 – clearly this is incorrect. In fact, with s42 consultation for LionLink anticipated in January 2026, NGV are now communicating (on NGV’s LionLink project website, under the ‘Our proposals’ tab) that the project (if consented) would not be due for completion until approximately 2032 (i.e. it is 12-18 months behind Sea Link). Table 3.2 within <a href="#">[APP-320]</a> highlights that not all of the generation identified within the ‘Sizewell Generation Group’ will be generating or consented in this region by the time Sea Link is operational (if consented). Sizewell C remains circa 10 years away, LionLink is yet to be consented, and Nautilus no longer has a need to connect in East Suffolk, with NGV rescinding their connection offer in March 2025. Nautilus is now connecting at the Isle of Grain, Kent.	<p>The points raised assert that the need for the Proposed Project only arises once Sizewell C and LionLink are operational. This is not an accurate interpretation of the Sea Link needs case. The Proposed Project is required to address needs drivers across both the East Anglia and South East, and in effect the Proposed Project will simultaneously resolve distinct issues on different parts of the network, which may take effect in either region at different times. Therefore the need for the Proposed Project does not arise only when Sizewell C and LionLink are operational. The needs case is set out in detail in <b>Application Document 7.2 Strategic Options Report Back Check [APP-320]</b>.</p> <p>Indeed, such is the urgency to deliver the Proposed Project that the National Electricity System Operator (NESO) Clean Power 2030 report identifies the 2030 delivery of the Proposed Project (alongside the separate Norwich to Tilbury overhead line project) as being critical to delivering a network which supports clean power pathways. In addition, the National Policy Statement (NPS) EN-1 states that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, which includes the Proposed Project. NPS EN-1 further states (at</p>

Reference	Matter	Point Raised	Applicant's Comments
			paragraph 3.3.63) that “Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible”, and also recognises (at paragraph 1.2.8) that over the next decade the onshore and offshore transmission network will require substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation. This is discussed in <b>Application Document 7.1 Planning Statement [AS-057]</b> .
4.0.9	Timing of project	The need case summary presented within Section 1.5 of the Applicant's submission document 6.1 ‘Environmental Statement Non-Technical Summary’ <a href="#">[AS-016]</a> states that reinforcement is required in part due to ‘the growth in offshore wind, interconnectors and nuclear power’. However, as discussed above, Sizewell C is approximately 10 years away from generating power, and the only interconnector now proposed within East Suffolk is LionLink (noting that the Nautilus project has been relocated to a connection on the Isle of Grain in Kent). LionLink would be 6-7 years away from completion if consented.	<p><i>Other National Grid Electricity Transmission projects</i></p> <p>In addition to the specific needs addressed solely by Sea Link, namely the need to facilitate further power flows out of Kent and the Sizewell Generation Group in East Anglia, the Sea Link project also makes a vital contribution to the wider need to provide further power flows out of East Anglia as a region.</p> <p>In meeting this wider regional need, Sea Link will operate alongside other proposed and consented National Grid Electricity Transmission reinforcement projects, including the consented new overhead line between Bramford and Twinstead and the proposed new overhead line between Norwich and Tilbury.</p>
4.0.10	Timing of project	Additionally, should the identified projects not become operational at the times anticipated or not be delivered at all, then it follows that this fundamentally changes the need for Sea Link. Importantly, project prematurity restricts opportunities for meaningful coordination with other projects looking to connect at Friston, such as LionLink, which only accentuates local concerns regarding cumulative impacts. ESC notes that NGET acknowledge this point in Section 5.13.4 of <a href="#">[AS-016]</a> , stating under the ‘Assessment of Inter-project Cumulative Effects’ that ‘ <i>The Proposed Project is also predicted to have significant cumulative effects with the LionLink Offshore Interconnector .... from the construction of the Suffolk Onshore Scheme and South Saxmundham Garden Neighbourhood. These effects are also anticipated during decommissioning.</i> ’	<p><i>Other third-party developer projects</i></p> <p>Other proposed and consented schemes being developed by third parties, for example Sizewell C (EDF/UK gov), the LionLink interconnector (National Grid Ventures) and the East Anglia One North and East Anglia Two windfarms (Scottish Power Renewables), contribute to the contracted generation that National Grid Electricity Transmission is obligated to accommodate on the transmission network.</p>
4.0.11	Timing of Project	The Overarching National Policy Statement (NPS) for Energy Infrastructure EN-1 states in section 3.3.65 that ‘ <i>There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives</i> ’, and 3.3.66 goes on to add that ‘.....The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts’. Section 4.1.3 states that ‘ <i>Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused</i> ’. In this context, it is the view of ESC that the Sea Link project is being fast-tracked due to political pressure, restricting meaningful opportunities for coordination with other projects. Sea Link is being delivered at pace due to the overarching ‘top-down’ need case narrative, but its lack of coordination with other projects will only result in more community and environmental impacts, in an area already experiencing material impacts, not less as desired by EN-1. Given the completion timeframes of Sizewell C and LionLink, Sea Link, the project is considered to be premature and as a result has missed opportunities for real coordination with future projects.	<p>A summary of the needs case is set out in response to Action Point 1 in <b>9.72.1 Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points [REP1-124]</b>. While the Applicant acknowledges ESC's views, the need to reinforce the electricity transmission network is urgent.</p> <p>The Clean Power 2030 ‘<i>Advice on achieving clean power for Great Britain by 2030</i>’ Report (November 2024) is the National Energy System Operator (NESO) analysis of what it considers to be the pathway to a clean power system by 2030.</p> <p>This report states that a major network expansion is needed to achieve this, and specifically that Sea Link is critical for the achievement of the Clean Power 2030 target. It also states that the delivery date for Sea Link required acceleration (from its licenced connection date in 2031 to its earliest in-service date of 2030). The report states that without Sea Link, consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>The Clean Power 2030 has not changed the plans for Sea Link, it only highlights the importance of delivering.</p>

Reference	Matter	Point Raised	Applicant's Comments
		This is discussed further below. A 12-18 month delay would have meant that Sea Link and LionLink could have underwent a joint examination enabling meaningful consideration of the cumulative impacts which would have assisted with the assessment and delivery of coordinated elements between the projects. The timing and need case presented for this project must therefore be balanced against the significant disruption and local impacts the project is set to introduce on the local communities of East Suffolk in conjunction with the already approved large scale of new infrastructure development being introduced across the district.	Notwithstanding that they are completely different and separate projects, the importance of delivering the Proposed Project means that the Applicant fundamentally cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its ASTI licence to deliver the Proposed Project, and to the Government objectives to delivery clean power by 2030. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind the Proposed Project.

# 5. Applicant's Comments on Chapter 5: Coordination and co-location

## 5.1 Introduction

5.1.1 This section provides the Applicant’s comments on Chapter 5: Coordination and co-location.

## 5.2 Comments Table

Table 5-1 Applicant’s comments on Chapter 5: Coordination and Co-location

Reference	Matter	Point Raised	Applicant’s Comments
5.1 Government’s aspiration for greater coordination			
5.1.2	Cumulative and in combination impacts	ESC’s formal approach is to be supportive of well-developed, well-designed and coordinated projects that enable the goal of Net Zero and the interim targets, as set out in the revised NPSs. This, however, has not been the case to date. Instead, ESC has had to face and deal with numerous infrastructure projects in recent years, all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the District. This cannot continue to occur at the expense of Suffolk’s environment and communities. The succession of individual proposals (including SPR’s EA1, EA3, EA2 and EA1N, Sizewell C, and potentially now Sea Link and LionLink) impacting our communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging, unsustainable, and unacceptable situation.	<p>The Applicant recognises and welcomes the ESC acknowledgement of the importance of increasing the capability of the network to enable the goal of net zero and other targets, and of the NPS support for this. This will play an important part in allowing the UK to decarbonise its energy system in a meaningful way that will not only support net zero energy targets but also deliver a more secure and resilient energy system.</p> <p>It is acknowledged that East Suffolk is a host authority for various energy DCO projects, many of which contribute to the government’s strategic objectives of decarbonising the network and moving away from fossil fuels towards net zero. The role of the Proposed Project is to ensure that the capacity of the existing network in East Anglia (and indeed the South East) is sufficient to accommodate the connection of these (and other) proposed new power sources connecting in the area. This is set out in <b>Application Document 7.2 Strategic Options Report Back Check [APP-320]</b>.</p>
5.1.7	Cumulative and in combination impacts	ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link and LionLink projects at all stages of the development consent process . It is imperative, given the pressures this area of East Suffolk is facing, that the cumulative and in-combination effects with other proposed and consented projects are considered and opportunities for coordination are identified and maximised. This is necessary and essential to reduce the adverse impacts of the developments on East Suffolk’s sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.	<p>While noting that the LIR here addresses the wider context of energy projects in East Suffolk, in addition to Sea Link individually, the Applicant does not agree that this occurs at the expense of Suffolk’s environment or communities.</p> <p>The Applicant agrees with the objective of comprehensively and robustly exploring every opportunity for coordination of the Sea Link and LionLink projects at all stages of the development consent process. Indeed, coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in <b>Application Document 7.10 Coordination Document [APP-363]</b>. This document sets out how coordination has been considered in various ways and at all stages of the project.</p>
5.1.6	Coordination with other energy scheme promoters / inter-project coordination	ESC notes that the Sea Link project engaged with the OTNR, as did the developers of the LionLink and Nautilus interconnector projects (National Grid Ventures), and the Five Estuaries and North Falls offshore wind farm	The LIR here refers to the Offshore Transmission Network Review (OTNR) and the related Offshore Coordination Support Scheme (OCSS), which provided grant funding to offshore energy projects to develop coordinated



Reference	Matter	Point Raised	Applicant's Comments
		<p>projects, and said they were committed to exploring options within the Early Opportunities workstream. In a joint statement published in July 2022, the three project promoters</p> <p>stated that <i>'whilst we welcome the progress the OTNR has made and recent publications from BEIS and the energy regulator, Ofgem, on enabling regulatory and policy changes, currently, the detailed commercial, regulatory and legislative frameworks needed to realise offshore coordination are not yet fully in place. We are working with the Government and Ofgem as they continue to progress the changes needed to enable greater coordination between these projects. So as not to impact the Government's 2030 offshore wind ambition, we continue to progress, in parallel, consent for grid infrastructure projects based on the existing regime'</i>. ESC believes that every opportunity should be taken to seek maximum coordination between the projects where this helps to minimise impacts on local communities and the environment. This has not happened to date.</p>	<p>options for offshore transmission infrastructure. The Applicant, alongside RWE Five Estuaries and RWE North Falls submitted a high-level feasibility study to the SoS for Energy Security and Net Zero for review in 2024. The study specifically looked at coordination in relation to capital and constraint costs, construction and commissioning methodologies and overall programme associated with a coordinated solution. It recognised that if the Proposed Project was re-purposed as an offshore wind farm connection point, it would lose capacity to serve its original primary purpose as network reinforcement, likely creating the need for additional network infrastructure including potential onshore infrastructure. It would also have led to up to a five year delay to the overall programme for RWE Five Estuaries and RWE North Falls. On this basis, the SoS decided not to grant further funding to the consortium to further develop an offshore coordination.</p> <p>Aside from the OCSS, coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in <b>Application Document 7.10 Coordination Document [APP-363]</b>. This document sets out how coordination has been considered in various ways and at all stages of the project.</p> <p>The Applicant recognises that managing and mitigating cumulative effects is an ongoing process which will require continued coordination with other developers. Further details are provided in section 7 of <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p>
5.1.7	Coordination with other energy scheme promoters / inter-project coordination	<p>ESC has previously requested National Grid PLC comprehensively and robustly explore every opportunity for coordination of the Sea Link and LionLink projects at all stages of the development consent process. It is imperative, given the pressures this area of East Suffolk is facing, that the cumulative and in-combination effects with other proposed and consented projects are considered and opportunities for coordination are identified and maximised. This is necessary and essential to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environment and the local communities, who have been hit by a constant barrage of energy projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.</p>	
<b>5.2 National Policy Statements</b>			
5.2.4	Coordination with other energy scheme promoters / inter-project coordination	<p>ESC acknowledges that Section 3.3.81 states that <i>'the importance of accelerating coordination does not...[mitigate] against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'</i> However, this section should not be relied upon to justify a failure to coordinate. Notwithstanding the fact that ESC remains unconvinced by the Applicant's Need Case, primarily in relation to project timing and a lack of coordination, as discussed in Section 4 of this LIR, ESC considers that a more coordinated approach to the development of the Sea Link project would not preclude the project from <i>'[reinforcing] the transmission system in the South East of England and East Anglia'</i> <a href="#">[APP-002]</a>. Therefore, ESC considers that the need for coordination should be held in the highest regard, and any failure to coordinate should be robustly justified, demonstrating how any coordination would prevent the project achieving its stated purpose.</p>	<p>The Applicant agrees with ESC that developers should seek to coordinate, co-locate, and consolidate infrastructure wherever possible. Indeed, coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in <b>Application Document 7.10 Coordination Document [APP-363]</b>. This document sets out how coordination has been considered in various ways and at all stages of the project. This includes:</p> <ol style="list-style-type: none"> <li>1. Coordination in the approach to consent, which included ensuring that the consents strategy for the Proposed Project is compatible with the emerging strategies for other projects, to allow coexistence and to allow the other forms of coordination to be considered in an ongoing way. This approach has helped to inform the Proposed Project's interaction with the extant SPR DCOs for EA1N and EA2, and with the emerging approaches being adopted by the LionLink (and formerly Nautilus) interconnectors.</li> <li>2. Coordination in the approach to project development, which has resulted in a number of key outcomes. These include the identification of Friston Substation as the point of network connection, adopting the principles of co-location when identifying</li> </ol>
5.2.8	Coordination with other energy scheme promoters / inter-project coordination	<p>It is therefore clear that NPS EN-1 and EN-5 encourage project promoters to build coordination into their projects at both the strategic and detailed design stages of development, particularly in areas such as East Suffolk that are facing a significant number of concurrent projects, giving rise to cumulative impacts being introduced on local communities. Yet with Sea Link (and LionLink), the results are disappointing. The Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) seek to address the need for more</p>	

Reference	Matter	Point Raised	Applicant's Comments
		coordination in the design and delivery of onshore and offshore electricity transmission infrastructure. Coordination must therefore be fully explored, with robust justification demonstrated should this not be pursued across the proposed projects.	<p>potential converter station and cable infrastructure locations, embedding design flexibility of various forms to accommodate the potential future design evolution of other projects, and the development of a site-wide coordinated masterplan at the Saxmundham converter station site. The masterplan is presented in Appendix A: NGV Coordination Suffolk Masterplan within <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p> <p>3. Coordination in project delivery. This is a key ongoing area of coordination, facilitated by the approaches described above. There are various ways that benefits could be delivered, depending on how future projects are developed and along what timescales. This may involve elements of shared construction facilities to reduce land-take, reduce combined construction timescales, and reduce other environmental impacts. It may involve a joined-up approach to detailed landscaping and drainage design. It may even involve co-delivery of elements of other projects' infrastructure. The extent to which these can and will be delivered depends on various factors including the design and programme of other projects, and the powers in their respective consents.</p> <p>These approaches to coordination provide opportunities to minimise environmental and local community effects of the Proposed Project in combination with other projects, in accordance with coordination policies set out in the NPSs for Energy.</p> <p>The Applicant remains committed to continuing engagement with all the projects identified to secure these coordination benefits and to also explore further opportunities for coordination where they arise.</p>
5.3.2	Coordination with LionLink	The lack of coordination evident between Sea Link and LionLink, both due to connect in the same locality if consented, is a significant concern. ESC considers that the maximum coordination should be inherent within the design and ambitious solutions delivered as the revised NPSs state. Coordination is considered to be more than just co-location; it is essential that there is a genuine reduction in the disruption and environmental impacts as a result which, at this stage, neither projects seem to recognise. Coordination should be essential during all phases of the developments, not just at the siting and routeing stage, although the co-location and sharing of infrastructure/corridors at the siting and routeing stage is important. The various NSIPs are currently being proposed on the basis of multiple different timescales. In order to deliver a genuinely coordinated approach, NGET should have sought to align the Sea Link project's timeframe for examination with that of NGV's LionLink project, allowing a shared or conjoined examination with the appointment of the same examining panel to consider the projects. The fact that NGET have sought to distance themselves from NGV in terms of co-ordination when both are owned by the same company bearing in mind the damage that both projects will cause to the area is insulting. Genuine co-ordination would not only help to reduce the huge burden on local communities and statutory consultees imposed by the	<p>There has been and continues to be significant coordination between the Applicant and NGV regarding the Proposed Project and the LionLink interconnector. This is set out in detail in <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p> <p>Indeed, coordination with other projects and other promoters has been ongoing for several years and has had a materially influenced the development of the Proposed Project. The outcome of this coordination is a project that has thoroughly explored and, where feasible, delivered a range of opportunities for the reduction of impacts on the environment and host communities. These opportunities are embedded in the routing and siting decisions, the approach to design and mitigation, and in the ways that the Proposed Project might work with other developers during the delivery stages to reduce impacts on communities and the environment.</p> <p>The LIR suggests that the Applicant should have aligned its project timescale with that of LionLink, with a view to a shared or conjoined examination with the appointment of the same examining panel to consider the projects. This would not be feasible. The Proposed Project and LionLink are completely separate projects, progressed by different developers, with</p>

Reference	Matter	Point Raised	Applicant's Comments
		consenting process, but it would also allow the robust consideration of the design and cumulative impacts of the projects.	<p>separate planning cases that are likely to draw on NPS policies differently, have been designed and developed in different ways, and have different justifications for land acquisition. Further and fundamentally, the importance of delivering Sea Link means that the Applicant cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its ASTI licence to deliver the Proposed Project. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind the Proposed Project.</p> <p>In terms of being owned by the same company, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Rather than this being insulting, as stated in the LIR, this legal separation is in fact a requirement of the Applicant's transmission licence.</p> <p>Nonetheless, opportunities for coordination between these projects have been thoroughly explored as they would be with any other third party developer, and, where feasible, delivered.</p> <p>Furthermore, a full inter-project and intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]</b>.</p>
5.3.3	Coordination with other local projects	In order to reduce the degree of disruption experienced by local communities and the adverse impacts on the environment, the delivery of Sea Link should be coordinated with other projects being delivered in the locality. As stated above, coordination should reduce the adverse impacts of the project so that, in the event the projects all receive consent, the situation should be avoided where each project is being delivered one after the other, with the combined construction effects being elongated and experienced over many years.	The Applicant recognises that managing and mitigating cumulative effects is an ongoing process which will require continued coordination with other developers. Further details are provided in Section 7 of <b>Application Document 7.10 Coordination Document [APP-363]</b> .



# 6. Applicant's Comments on Chapter 6: Site-specific Commentary – Sea Link Project Infrastructure proposed within East Suffolk

## 6.1 Introduction

6.1.1 This section provides the Applicants comments on Chapter 6: Site-specific Commentary – Sea Link Project Infrastructure proposed within East Suffolk.

## 6.2 Comments Table

Table 6-1 ~~Applicants~~Applicant's Comments on Chapter 6 :Site-specific Commentary – Sea Link Project Infrastructure proposed within East Suffolk

Reference	Matter	Point Raised	Applicant's Comments
6.1 Landfall			
6.1.2.1 – 6.1.2.2	Tourism	<p>The landfall selected is located between the seaside towns of Aldeburgh and Thorpeness, approximately 700m inland form Thorpe Road which runs adjacent to the well-known sand and shingle beach. The site is within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Royal Society for the Protection of Birds (RSPB) North Warren Reserve, and close to the Sandlings Special Protection Area. Section 85 of the Countryside and Rights of Way (CRoW) Act 2000 introduced a strengthened duty 'to further the purpose' of National Landscape designations, meaning to actively work towards and promote its core function, conserving and enhancing the natural beauty of the area.</p> <p>The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. It follows that the disruption created in the area during the construction phase of the proposed Sea Link project would adversely impact both the local community and the tourist economy. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance. Further details in relation to ESC concerns regarding the impact on the tourist economy from this project in combination with other NSIPs has been provided in the project wide section later in this LIR.</p>	<p>The Suffolk &amp; Essex Coast &amp; Heaths Area of Outstanding Natural Beauty (SECHAONB) and the defined Suffolk Heritage Coast in relation to the Proposed Project are noted and assessed within <b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]</b>.</p> <p>The limited effects associated with the landfall site are detailed within the appendices for landscape character assessment (<b>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]</b>) and visual amenity assessment (<b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</b>). 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 typically therefore limited to those associated with the cable laying barge at sea being not too dissimilar to the presence of marine vessels which can be typically seen out at sea and construction around the landfall transition joint pit set against a backcloth of woodland and not on the focused views from recreational receptors walking between Aldeburgh and Thorpeness. Further details on this should be referred to within Table 2.3 of <b>Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]</b>.</p> <p>Further information on the section 85 duty should be referred to within <b>Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]</b>.</p> <p>Recognising that PRow and recreational trails are valued by both locals and tourists, Section 10.9 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> assesses the potential effects of the Proposed Project on disruption to the use</p>



Reference	Matter	Point Raised	Applicant's Comments
			<p>of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including:</p> <ul style="list-style-type: none"><li>• the quality of user experience;</li><li>• quality of the route;</li><li>• purpose of usage; and</li><li>• potential for substitution.</li></ul> <p>In Section 10.9, proposed diversions are assessed, and where required, they are concluded to provide equivalent connectivity, character, and length to the sections of the existing route they would replace. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated.</p> <p>The Applicant recognises the importance of local amenity and access to PRow. In response to this concern, <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> assesses the likely significant effects on amenity of PRow users, drawing on assessment in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> and <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b>. The cumulative impact is also assessed in <b>Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>. No significant adverse effects are identified with regards to human health and wellbeing.</p> <p>See <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]</b> for the Applicant's response to concerns regarding tourism.</p>
6.1.2.3	Tourism	It is a serious concern that landfall for the proposed Sea Link and LionLink projects have not been co-located to reduce the combined environmental impacts of construction on the Suffolk Coast.	Regarding the reference in the representation to National Grid PLC influencing the strategies for both the Proposed Project and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered.
6.1.2.4	Tourism	The proposed landfall site for Sea Link lies along Thorpe Road, an important recreational route for vehicles and pedestrians, connecting the popular visitor destinations of Aldeburgh and Thorpeness, and permitting access to car parks, the beach and The Scallop, an important visitor attraction.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, through which no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> of the

Reference	Matter	Point Raised	Applicant’s Comments
			Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on PRoW and recreational routes and visitor attraction receptors, including the Scallop at Aldeburgh Beach. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> . No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.
6.1.2.5	Tourism	Potential closure of the road to enable construction works will affect residents, visitors, and businesses who may have to be diverted along the B1122 and B1353 to reach their destination. The B1122 will also be affected and is bisected by the Order Limits for underground cabling works and siting of a construction compound.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. The potential impact of construction traffic on the surrounding highway network has been assessed within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> based on the peak construction phase of the Proposed Project. This includes an assessment of various criteria including severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay, road safety, hazardous/ large loads and Public Rights of Way (PRoW) diversions and closures. The construction vehicle routing has been designed to minimise impacts across the highway network, and Heavy Goods Vehicles (HGVs) will avoid passing through Snape and Thorpeness, as shown by the HGV routing plan within <b>Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]</b> . Construction traffic through Aldeburgh will also be limited to 10 HGVs daily, as the majority of construction traffic will access the landfall location via the new haul road which will be constructed. The traffic and transport assessment within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> concludes that, with the management and mitigation identified within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]</b> and <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> that there is not expected to be the potential for any significant effects as a result of construction traffic associated with the Proposed Project.
6.1.2.6	Tourism	ESC needs to be reassured that disruption, especially footpath diversions and road closures, will be planned to minimise the impact on residents, visitors and businesses. Road closures and associated works should fall outside periods of peak visitor activity, and any road closures and diversions should be published well in advance with sufficient signage erected to ensure that road users can navigate the diversions. ESC will require formal advance notification.	The Applicant acknowledges this feedback. Diversion routes have been identified where any temporary PRoW closures will be required. These details are set out in <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> . It is proposed to temporarily divert several PRoW during the construction phase. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. Short term temporary diversions will last four weeks, and long-term temporary diversions have been classified as a period of between six months and the full construction phase.

Reference	Matter	Point Raised	Applicant's Comments
			<p>Similarly, mitigation for any potential road closures is outlined within <b>Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan Suffolk [AS-008]</b>. The Applicant will inform the relevant Local Authority and other relevant stakeholders of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest possible opportunity. This is also contained within <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]</b> which is secured via Requirement 6 of Schedule 3 in <b>Application Document 3.1 draft Development Consent Order [AS-087]</b>.</p> <p>Recognising that PRoW and recreational trails are valued by both locals and tourists, Section 10.9 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including:</p> <ul style="list-style-type: none"><li>• the quality of user experience;</li><li>• quality of the route;</li><li>• purpose of usage; and</li><li>• potential for substitution.</li></ul> <p>In Section 10.9, proposed diversions are assessed, and where required, they are concluded to provide equivalent connectivity, character, and length to the sections of the existing route they would replace. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated.</p>
6.1.3.1	Landfall Access	ESC defers all highway and traffic matters to SCC Highways Authority. It does, however, wish to highlight that access to the landfall area is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular tourist seaside destinations. At the time of the DCO examinations for the SPR East Anglia ONE North and TWO projects, proposals included HGV and vehicle access to the order limits passing south of Aldringham by using the A1094 and B1122. At that time the difficulties of large vehicles using the roundabout at the entrance to Aldeburgh was a consideration for the developer. Given that the Sea Link project proposes a landfall directly adjacent to the B1122, ESC recommends that NGET revisit the constraints pertaining to the proposed use of narrow roads, as highlighted in the SPR examinations, and limit HGV movements as far as practicable, putting the lessons learned from the SPR projects into practice for Sea Link. We would expect such controls to be contained within the Outline Construction Traffic Management Plan (OCTMP). ESC also wishes to highlight to the ExA that since the time of the SPR project examination, SPR amended the proposed installation methods to be used for the onshore cables when crossing the B1122 south of Aldringham. Planning Application DC/25/2037/FUL replaced the need for open	<p>The Applicant notes that ESC defers all highway and traffic matters to SCC Highways, and the Applicant has provided responses to SCC's Local Impact Report (submitted at Deadline 2), as well as to SCC's RR in <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>. Nonetheless, responses on the matters raised have been provided below.</p> <p>The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston). The B1122 will only be used by Abnormal Loads under strict management as set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]</b>. The A1094 / B1122 roundabout geometry was considered in the EA1N/EA2 examination, and the Applicant has committed to minimising general HGV traffic along this route (a maximum of 10 daily HGVs). Access to the landfall site will be limited and carefully managed. Further details in response to ESC's comments have previously been provided in response to SCC's RR in <b>Application Document 9.34.1 Applicant's Detailed</b></p>



Reference	Matter	Point Raised	Applicant's Comments
		cut trenching by the use of horizontal directional drilling under the Hundred River and the road. This also resulted in the accesses originally proposed on the B1122 no longer being required, removing HGV traffic from the B1122. This was a positive enhancement over the DCO consent as it reduced HGV movements in this area.	<p><b>Responses to the Relevant Representations identified by the ExA [REP1A-043].</b></p> <p>Further details relating to the access points near the landfall area, including to the east of Thorpe Road (Bellmouth S-BM13) and the access points to the east and west of B1122 Leiston Road (Bellmouths S-BM01 and S-BM02) are provided within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [054]</b> and <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]</b>.</p>
6.1.4.2	Coastal Management	The proposed depth of cable burial beneath the nearshore, foreshore and hinterland has not yet been stated by the applicant – only an ‘illustrative diagram’ of the HDD profile beneath the foreshore and hinterland has been made available (Drawing Reference DCO/T/DE/SS/1212 of [APP-037]) and the detail is unsatisfactory at present. ESC requires a scaled, cross-sectional diagram of the HDD profile from the offshore cable joint to the onshore TJB, in order to scrutinise the proposal from a Coastal Management perspective and determine whether the depth of burial will be satisfactory in a worst-case future climate change scenario, over the project’s lifetime. Contemporary topographic and bathymetric survey data should be used to confirm current beach and seabed levels (in metres ODN) respectively. If the Applicant cannot provide the depths of cable installation yet, ESC requires a mechanism in the DCO for later consultation and approval of the levels proposed by the applicant.	<p>Regarding a scaled, cross-sectional diagram of the HDD profile, please refer to the conceptual HDD design drawing in Application Document <b>7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b>.</p> <p>The diagram shows the proposed depths of cable installation for a design that has been developed based on currently available information.</p>
6.1.4.3	Coastal Management	ESC must ensure that the cable will be buried sufficiently over the lifetime of the project because of the obvious danger to public health and safety as well as the negative impact that trying to re-bury and protect the cable would have on coastal geomorphology, namely the shingle beach barrier and the coastal protection that feature provides.	<p>The cable will be installed in ducts at 16-25m depth below the nearshore, foreshore, and RSPB land. See conceptual design drawing (section) in Application Document <b>7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b>.</p> <p>The section shows that at the current position of the shingle beach barrier, the cable is buried in excess of 25m below the beach crest level and is therefore more than adequately protected from natural, coastal erosion processes.</p>
6.1.4.4	Coastal Management	ESC considers a depth of between 25m and 30m under present foreshore levels to be adequate for the long-term avoidance of cable exposure. The applicant must provide a detailed design of the landfall infrastructure with sufficient cable depth beneath the current and future foreshore levels.	The conceptual design for the cable is to be installed in ducts at 19-25m depth beneath the foreshore. See conceptual design drawing (section) in Application Document <b>7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b> .
6.1.4.5	Coastal Management	ESC requires details of the mitigation measures Sea Link propose to put in place should there be a risk of the cable being exposed. This would include the environmental trigger levels used to implement this mitigation, and the process of identifying and reporting these from the proposed monitoring scheme (outlined in Section 1.10 (Offshore Environmental Control Measures) – Post-Installation Survey and Reporting of the Outline Offshore Construction Environmental Management Plan [APP-339]).	The Applicant’s approach to monitoring the cables to detect any exposures is set out in <b>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1-003]</b> . This includes post installation surveys that will be carried out after 12 months then at further 12 to 24 month intervals in high risk areas e.g. shipping channels. In the event that an exposure is detected, appropriate measures will be implemented to remediate the exposure. The method used will be dependent on the nature of the exposure and location. All works will be completed in accordance with standard marine licence procedures and in consultation with the MMO and Natural England. The cable (and method of installation) is designed to have a lifespan of 40 to 60 years. The risk of exposure will be mitigated at cable installation through achieving target DOL. Future exposures are therefore unlikely to occur and reduced through cable design.



Reference	Matter	Point Raised	Applicant's Comments
6.1.4.6	Coastal Management	It is not uncommon for ESC to deal with exposed cables on the foreshore after storm events, such as the one shown photographed in Figure 1 below, exposed at Pakefield after Storm Amy. Coastal erosion has accelerated and now occurs at an unprecedented rate in many places on the Suffolk Coast. This is why ESC advises that a conservative approach should be adopted to the calculation of cable burial depth beneath current and future foreshore levels.	<p>The conceptual design for the cable is to be installed in ducts at 19-25m depth beneath the foreshore. See conceptual design drawing (section) in Application Document <b>7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b>.</p> <p>As previously noted, a conservative approach has been adopted with regard to the cable burial depth which is considered to be adequately protected from natural coastal processes at this location, which are very different from the situation at Pakefield.</p>
6.1.4.7	Coastal Management	An indicative location of the TJB is illustrated on Indicative General Arrangement Plans – Suffolk [APP038], but there is scant information available on the actual Suffolk Landfall infrastructure to be left in-situ. ESC requires more detail on the TJB i.e. footprint, dimensions and security measures of any infrastructure on the surface, post-construction.	<p>Transition Joint Bays would be 10 –15 m by 2-3 m width and 2-3 m depth, as presented in Table 4.11 of <b>Application Document: 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [APP1-004]</b>. Note that this would be buried to allow 1.5 m clearance above the TJB for agricultural activity. Each duct would have an individual TJB. The final dimensions would be confirmed during the detailed engineering phase. Information about the security measures will be provided preconstruction.</p>
6.4.7.8	Coastal Management	ESC welcomes DCO Condition 10(1) – ‘ <i>Landfall installation must only use trenchless landfall techniques</i> ’ [AS-087], as this minimises impact on coastal geomorphology and coastal processes throughout construction and operation. ESC request to be consulted on the Method Statement and Monitoring Plans for (Suffolk) cable landfall.	<p>Consultation on the method statements for landfalls is not considered standard practice although this information may be provided to ESC for information. Details of monitoring plans are provided in <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]</b> which will apply to the cable landfall. The Applicant welcomes any comments/suggestions from ESC so these can be considered in subsequent revisions to the document.</p>
6.4.7.9	Coastal Management	ESC welcomes the embedded mitigation measures listed in Paragraph 1.8.3 Part 4 Marine Chapter 1 Physical Environment of the ES [AS-113] and agrees that it is imperative to minimise disturbance of the Coralline Crag as it is considered integral to local geomorphological stability. With regards to the additional mitigation measures listed in Paragraph 1.10.1, ESC requests detail on the frequency and extent of these ‘ <i>MPE05-Depth of Burial Monitoring surveys to be undertaken post installation</i> ’, and the details of what will trigger implementation of mitigation.	<p>A preliminary inspection, maintenance and repair (IMR) programme as the basis for preventative maintenance may comprise of the following:</p> <ul style="list-style-type: none"> <li>• Base-line as-built DOL survey (ideally a continuous survey after installation and protection completed).</li> <li>• Initial DOL monitoring survey 12 months after commissioning and handover to operations.</li> <li>• Regular monitoring surveys at 12-24 months duration to establish any areas where DOL hot spots may develop and where integrity of cable is critical (eg. shipping channels, crossings) and inform the maintenance programme. Establish that the seabed conditions and DOL have reverted to equilibrium and reduce the frequency of inspections. Reduced interval surveys to ensure DOL is maintained (may be as much as 5-year interval).</li> </ul> <p>Paragraphs 4.6.252 to 4.6.254 in <b>Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]</b>.</p>
6.1.4.10	Coastal Management	Coastal Monitoring: ESC would expect bespoke surveys and subsequent reporting to be undertaken, annually for the first three years after construction, and then at 5 yearly intervals until decommissioning. ESC supports the use of DEFRA/Anglian Coastal Monitoring Programme (ACMP) monitoring data to bolster the monitoring reports but asserts that Sea Link must not rely on the ACMP data alone for post-construction or mitigation monitoring at the landfall site as there is no guarantee that this programme will receive future funding. ESC would expect the applicant to proactively organise bespoke bathymetric	<p>MPE06 - Over the operational lifetime of the Proposed project, monitoring of the beach profile and erosion rates is carried out at the Suffolk landfall site where rock bags are planned to be placed at the HDD exit pits (see <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)</b>).</p> <p>A preliminary inspection, maintenance and repair (IMR) programme is the basis for preventative maintenance may comprise of the following:</p>

Reference	Matter	Point Raised	Applicant's Comments
		and topographic surveys that monitor the depth of cable burial and rates of geomorphological change, from baseline surveys.	<ul style="list-style-type: none"><li>• Base-line as-built DOL survey (ideally a continuous survey after installation and protection completed).</li><li>• Initial DOL monitoring survey 12 months after commissioning and handover to operations.</li><li>• Regular monitoring surveys at 12-24 months duration to establish any areas where DOL hot spots may develop and where integrity of cable is critical (eg. shipping channels, crossings), and inform the maintenance programme. Establish that the seabed conditions and DOL have reverted to equilibrium and reduce the frequency of inspections. Reduced interval surveys to ensure DOL is maintained (may be as much as 5-year interval)</li></ul> <p>Data from the IMR programme referred to above will be assessed in conjunction with data from the DEFRA/Anglian Coastal Monitoring Programme (ACMP), whilst this continues to be available. Should funding for the ACMP be curtailed at some point in the future, the Applicant will evaluate alternative sources of data available at the time and consider the requirement for supplementary, site-specific bathymetric and topographic surveys to support monitoring activities.</p>
6.1.4.11	Coastal Management	ESC acknowledges Requirement 13 of the DCO pertaining to decommissioning and highlights the need for a landfall-specific assessment of the geomorphology and coastal processes at the end of the project's lifetime. If removing the infrastructure from the coastal environment is deemed, by ESC, more detrimental than beneficial to remove, then it should be left in place with a contingency plan.	Towards to the end of the Project's operational life, options for decommissioning will be re-evaluated, specifically in the context of the geomorphology and coastal processes associated with the landfall site at that point in time. This can be expected to include consideration of leaving infrastructure in place rather than removing it, particularly where this may be considered as beneficial. As a statutory consultee, ESC can expect to have an involvement in this process.
6.1.5.1	Flood Risk	ESC defers matters relating to flooding and surface water drainage to the EA and SCC LLFA, however, wishes to highlight that the low lying Hundred River valley has the potential for surface water and tidal inundation and lies within Flood Zone 3	This comment is noted. Flood risk from surface water and tidal sources has been assessed within <b>Application Document 6.8 Flood Risk Assessment [APP-292]</b> , with supplementary information provided in <b>Application Document 9.4 Supplementary Environmental Information – Flood Risk Assessment [AS-099]</b> .
6.1.6.1	Cumulative Impacts	Given the sensitivities of the landfall site, the ExA should satisfy themselves that sufficient detail is provided by the Applicant in relation to the impacts of the works at the landfall, in addition to the provision of required mitigation so to deliver a significant reduction in the adverse impacts socially, environmentally, and economically.	Noted.
6.1.7.3	Ecology	Whilst the use of a trenchless technique (such as HDD) is preferable to an open cut technique, it comes with its own potential construction impacts, such as the risk of 'frac out' of the drilling compound/material (e.g., bentonite), the risk of technical failure meaning that excavation within the SSSI is necessary to recover equipment, and the need to access the SSSI to monitor the progress of each drill to ensure that it follows the correct course. Not all of these concerns are satisfactorily addressed in the application documents. For example, the Register of Environmental Actions and Commitments (REAC) <a href="#">[APP-342]</a> at Table 1.1 ID point B22 lists a potential effect as " <i>Impacts to ecological receptors from having to retrieve drilling equipment</i> ", the mitigation commitment as " <i>Measures to avoid the trenchless drilling equipment getting stuck</i> " and the securing document as " <i>Application Document 7.5.3.2 CEMP</i> "	<p>Excavation in the SSSI will not occur because the HDD will be at too great a depth beneath the SSSI for excavation. The HDD conceptual design is 12m at the western end of the SSSI and 16 m or greater for the majority of the route beneath the SSSI. Please see the conceptual design in <b>Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b>.</p> <p>Paragraph 2.9.8 of Application Document <b>6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]</b> includes further text explaining what would happen in the unlikely event of stuck drilling equipment.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<i>Appendix B Register of Environmental Actions and Commitments</i> ". However, the REAC doesn't actually include details of any such measures and refers to itself as the securing document. It therefore appears that there are actually no measures to address this impact proposed to be secured in the plan.	
6.1.7.4	Ecology	ESC has experience of other NSIPs utilising HDD techniques which have suffered 'frac outs'. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address potential impacts which could arise must be fully explored. For example, several bentonite frac outs occurred at Martlesham Creek when using trenchless techniques for ScottishPower Renewables' East Anglia ONE project. The developer monitored the situation closely for impact and the bentonite was allowed to naturally attenuate through tidal action. The Environment Agency (EA) and Natural England were engaged with in these instances, and ESC considers engagement with relevant stakeholders (for the Sea Link landfall site, this may include Natural England, the RSPB, and the Environment Agency) essential in the event of frac outs to manage impacts. The difference between the Martlesham Creek frac out and a potential one at the North Warren landfall is that Martlesham Creek is where the River Fynn enters the River Deben (which is tidal at that point) and therefore natural dispersal of the released bentonite was determined to be a viable option. At North Warren any released bentonite would be into the ditch system which does not have a comparable flow pattern to Martlesham Creek, meaning that natural dispersal is considered to be much more unlikely. It is therefore important that the CEMP REAC is updated as set out in paragraph 6.1.7.3 above to include appropriate mitigation measures to address this concern.	<p>The mitigation measures being implemented to minimise and address the risk of surface frac out or break out are contained in <b>Measure B09</b> of Application Document <b>7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b>.</p> <p>Measure B09 includes a commitment to hydrofracture modelling on the HDD design. <b>Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]</b> states that initial hydrofracture modelling indicates a 2.8 factor of safety against drilling fluid frac-out along the land segment of the drill.</p> <p>Additionally, Measure GH10 in <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b> provides for a drilling fluid management plan, that includes drilling fluid breakout mitigation measures, and Measure B59 commits to sharing the plan with Natural England. Other Stakeholders such as the RSPB and EA will continue to be engaged where required.</p>
6.1.7.5	Ecology	Technical assessment included in Appendix A of the Design Development Report [APP-321] appears to indicate that trenchless crossing of the SSSI is feasible and it is understood that the draft DCO (Version D) [AS-087] commits to using a trenchless crossing technique as opposed to an open cut technique (see Condition 10). This is essential. Open cut would be unacceptable.	Noted. The project is committed to a trenchless installation for the landfall at Suffolk, as stated in Measure W12 and Measure LV08 in <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b> .
6.1.7.6	Ecology	ESC defers detailed technical consideration of this matter to Natural England, the Environment Agency, and the RSPB (as SSSI landowner) and expects the Applicant to collaborate with these stakeholders to ensure that this mitigation is feasible and adequately secured. ESC considers that any acceptability of the proposed landfall is wholly dependent on the use of trenchless technology to pass under the Leiston to Aldeburgh SSSI and North Warren RSPB reserve. To open cut this area of land would put the designations at greater risk of harm. ESC maintains that the selection of this landfall area means that the project has the potential to result in a greater impact on the designated site compared to a landfall option which avoids the SSSI entirely.	This is noted by the Applicant. See responses to 6.1.7.4 and 6.1.7.5.
6.1.7.7	Ecology	The ES conclusions on the ecological impacts of the landfall cable installation are only reliable in a scenario where no technical issues with the construction are encountered. Where technical issues which would cause an adverse impact can be reasonably predicted, the project must secure adaptive mitigation measures to cover reasonably predictable failure scenarios and ensure that the SSSI is not impacted by any remedial works that may be necessary. These should include a description of parameters to be used to assess whether material which escapes as the result of a frac out will be actively removed from site or left to naturally disperse; what mitigation measures will need to be put in place to protect ecological features if removal	Regarding drilling fluid frac out mitigation, see responses to 6.1.7.4. See response above that explains the depth of the HDD which means that no surface works will be required within the SSSI.



Reference	Matter	Point Raised	Applicant's Comments
		of material is required (particularly in relation to breeding birds, wintering birds, otter and water vole); and what monitoring measures will be put in place to assess ecological impacts as a result of either material removal or leaving material in-situ to naturally disperse. These should be identified in the Outline Construction Environmental Management Plan (OCEMP) REAC and the detail confirmed as part of the discharge of the Construction Environmental Management Plan (CEMP) for that phase of the work under Requirement 6.	
6.1.7.8	Ecology	In addition to the above, it must also be ensured that construction works do not significantly inhibit the RSPB's ability to appropriately manage the SSSI at North Warren. Should any specific considerations in relation to this be required, they should be secured as part of the CEMP and Landscape and Ecological Management Plan (LEMP).	The Suffolk Ecology and Biodiversity ES Chapter confirms that there will be no impact on management of the RSPB Reserve. Also see the response to the RSPB Written Representation and the Response to the RSPB Relevant Representation in <b>Application Document 9.34.5 Applicant's Responses to Selected Relevant Representation Responses [REP1-115]</b> .
<b>6.2 HVDC cable (landfall to Saxmundham Converter Station)</b>			
6.2.1.2	Coordination	At the statutory consultation stage, a Preliminary Environmental Information Report (PEIR) was presented which included the possibility for Sea Link to lay cable ducts for the other known projects looking to co-locate infrastructure with Sea Link at that time. However, in the lead up to the DCO application being submitted to PINS, ESC notes that changes to the coordination strategy resulted in NGET removing the potential for meaningful coordination with the forthcoming NGV LionLink project, reflecting NGV's early dismissal of the proposed Aldeburgh landfall and onward cable route. ESC understands this was a reactionary decision on the part of NGET in response to NGV's choice to focus on the northern landfall options due to offshore constraints. However, ESC remains disappointed that the two projects did not feel obliged to coordinate more than presently proposed in line with NPS policy guidance.	Regarding the reference in the representation to National Grid PLC influencing the strategies for both the Proposed Project and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET.  Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered.
6.2.1.5	Impact on residential receptors	At the additional pre-application consultation stages, ESC welcomed the realignment of the HVDC cable route near Leiston Road, moving construction activity further away from nearby residential receptors. However, the cable route remains near some residential receptors, and ESC welcomes all efforts to minimise the impacts of construction on these nearby receptors.	An Outline Onshore Construction Environmental Management Plan ( <b>Application Document 7.5.3 Outline Offshore Construction Environmental Management Plan [AS-127]</b> ) has been prepared to ensure that construction activities will cause minimum disruption to local residents and members of the public. Compliance with the contents of the Onshore CEMP is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order</b> .
6.2.2.1	Landscape and arboriculture	There are numerous negative aspects in landscape terms associated with the proposed HVDC cable route. It is inevitable that an open cut trench laying method for cable installation and the associated haul road will lead to adverse impacts on the fabric of the landscape i.e. losses of sections of field boundary hedgerow and tree removals, although it is recognised that to varying degrees, these are largely of a temporary nature. This vegetation removal would, however, be occurring in addition to the clearance works that have already taken place in the district as part of other NSIPs, including Sizewell C, so there is a degree of rolling cumulative impacts on the landscape arising from the various major infrastructure projects that are underway in a relatively small area. The significance of effects arising from the required tree and hedge section removals over the length of the cable route has been assessed to be moderate-minor in the immediate post installation period, and reducing to minor-negligible once replacement planting establishes and takes a presence in the landscape.	Vegetation loss has been minimised by careful routeing and is reported as a reasonable worst case to allow flexibility in enabling the final alignment of the Proposed Project to further minimise the removal of boundary vegetation. Where practicable the detailed design will be further developed to avoid or minimise impacts to trees (refer to <b>Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]</b> ). The permanent tree loss would be spread across the Suffolk Onshore Scheme. Due to the layered vegetation pattern within the local landscape, this would not be read as a treeless corridor from those experiencing this local landscape.  The Applicant accepts that the total inter-cumulative effects of the construction of the cable corridors (EA1N, EA2 and LionLink along with the Suffolk Onshore Scheme) on landscape character have the potential to result in significant cumulative effects on landscape character (refer to <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]</b> ). The inter project total cumulative effects



Reference	Matter	Point Raised	Applicant's Comments
			<p>associated with the various cable corridors would be temporary and short term because of the committed measures to reinstate them.</p> <p>The outline Landscape and Ecological Management Plan (oLEMP) (<b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b>) commits to reinstatement of vegetation removal. Whilst this means that trees that have been removed above the cable alignment cannot be replaced in situ, tree planting along the adjacent field boundaries within the Order Limits would be reviewed during detailed design stage.</p>
6.2.2.2	Landscape and Arboriculture	Although existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction, a new edition is due to be published in the very near future, and when it is, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. The timing of the new British Standard is currently unknown, but ESC will expect all tree survey information to be re-submitted according to the new guidance once the new Standard is published and for Arboricultural Method Statements to be amended accordingly.	<p>Please see the response in Table 2.2.3 within <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>.</p> <p>According to the BSI the updated version of BS 5837 is now expected to be published in November 2026. Even if this date is achieved, construction of the Proposed Project is planned to have commenced by this date subject to grant of development consent, and it would not be practicable, or reasonable, to expect a developer to update their surveys at such a late stage.</p>
6.2.2.3	Landscape and Arboriculture	Having regard to the positive aspects in landscape terms, all areas of onshore development have been subject to a full arboricultural survey and impact assessment to give a full understanding of potential impacts on existing trees and hedgerows. Every effort appears to have been made to keep hedgerow and tree losses to a minimum and to those absolutely necessary. Retained trees and hedgerows will be fully protected according to guidance contained in BS5837:2012 Trees in Relation to Design, Demolition and Construction (or succeeding editions). Submitted documentation shows a commitment to the use of micro-siting/micro-engineering for final cable routing to allow retention to existing trees wherever possible and practical. A detailed replanting methodology has been agreed with an adaptive maintenance approach to ensure full and successful establishment. ESC is therefore satisfied that adverse impacts to the fabric of the landscape can be mitigated to a reasonable and acceptable degree by replanting as part of a full landscape restoration programme. Basic land restoration post cable laying will be secured by a suitable soil management strategy. This has proved a successful approach on similar already consented and installed cable route projects.	The efforts made to minimise vegetation loss and commit to reinstatement works are acknowledged. This is secured within <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b> and <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b> .
<b>6.3 Saxmundham Converter Station Site and River Fromus Crossing</b>			
6.3.2.1	Coordination	ESC understands that the Saxmundham site was identified, in part, due to its apparent ability to accommodate more than one converter station at a single co-located site, and that NGET has now confirmed the preferred location of the Sea Link converter station within the wider context of that landscape. NGET's statement that they would work with NGV to develop co-ordinated solutions to the development and delivery of the Sea Link and LionLink projects has not however led to tangible co-ordination. The two converter stations are co-located, not co-ordinated. Both projects would need to run HVAC cables from the co-located converter station site to the connection point in Friston, yet no cable route or cable duct co-ordination is currently proposed by Sea Link (discussed in more detail within 6.4 of this LIR). NGET's intentions to co-	Regarding the reference in the representation to National Grid PLC influencing the strategies for both the Proposed Project and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and National Grid Ventures (NGV) are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered.

Reference	Matter	Point Raised	Applicant's Comments
		ordinate with other projects must be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on environmental, residential, and socioeconomic receptors within East Suffolk. Currently, no such benefit has been presented and NGV and NGET appear to be working in silos, catering only for their own project's interests, rather than the interests of the local communities set to host or neighbour their onshore infrastructure. This means that construction impacts will elongate through a succession of similar cable installation works in the same vicinity (should both projects be consented). Such a blinkered approach to co-located development is entirely unacceptable to ESC and the local communities it represents.	
6.3.3.4	Good Design	Notwithstanding ESC's position, should Sea Link alongside other NSIPs such as the proposed LionLink project be progressed within the East Suffolk District, this should be on the basis of a co-ordinated approach. ESC remains significantly concerned about the cumulative impacts of multiple projects. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station sites are genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and demonstrate the achievement of long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.	<p>The NGV Coordination Suffolk Masterplan within Appendix A of <b>Application Document 7.10 Coordination Document [APP-363]</b> provides information relating to the design coordination between the different converter station projects proposed on the edge Saxmundham. This colocation exercise has been undertaken in accordance with <b>Application Document 7.12.1 Design Principles - Suffolk [APP-366]</b> which contains an Overarching Design Principle OA.6 for Coordination and a Converter Station Design Principle CO.1 for Coordination with other projects. CO.1 is a secured Key Design Principle requiring a coordinated landscape masterplan for the site. The Potential Associated Activities suggests the frequency at which coordination workshops between the different projects could take place. Converter Station Design Principle CO.2 Height, scale, and massing response to context, has been provided with retaining the flexibility of the rest of the site for future projects in mind.</p> <p>The Sea Link project team has been consulted by the LionLink team on the updated version of the masterplan which will form part of the LionLink Statutory Consultation. This will demonstrate that coordination is ongoing and there will be further consultation on the masterplan via the LionLink project.</p>
6.3.3.5	Good Design	The provision of an inclusive and collaborative master planning process is an essential component of the delivery of good design. This collaborative process must however extend into the more detailed design phases and include genuine engagement with the local authorities, parish and town councils and local communities. It is important that the site is designed to minimise the adverse impacts through innovation and embedded mitigation and maximise any opportunities for benefits through the delivery of enhancements. Recent NSIPs consented within East Suffolk have also included an independent design review process. ESC notes that the Applicant has identified the environmental considerations, including landscape and visual considerations, which have informed the siting and outline design of the proposed Saxmundham converter station, as set out application Part 1 Introduction Chapter 4 Description of the Proposed Project <a href="#">[AS-093]</a> . ESC also notes that the Design Approach Document – Suffolk <a href="#">[APP-364]</a> provides details regarding how the design of this structure, in terms of building form and the external materials, has been developed alongside consultation and stakeholder feedback, including engagement with a design review panel.	<b>Application Document 7.12.1 Design Principles - Suffolk [APP-366]</b> contains Converter Station Design Principle CO.1 for Coordination with other projects. CO.1 is a secured Key Design Principle requiring a coordinated landscape masterplan for the site. The Potential Associated Activities suggests the frequency at which coordination workshops between the different projects could take place through to RIBA design work stage 3. Table 3.1 of Converter Station Design Principles - Suffolk includes Key Design Principles developed in line with National Model Design Code guidance which define the intended outcomes in respect of the embedded mitigation that is to be achieved through the design of the converter station. <b>Application Document 7.11.1 Design Approach Document - Suffolk [APP-364]</b> provides illustrations of how the design principles could be put into practice. In this document, Section 4.0 Design Evolution includes the presentation material for the independent design review panel (DRP) as well as tables of how the recommendations made in the panel report have been addressed. Project Level Design Principle PE.1, Stakeholder engagement, within Table 2.2 of the Design Principles includes for a further DRP once sufficient supplier information is available and further thematic meetings with LPAs in the lead up to submitting information demonstrating compliance with the Key Design Principles.
6.3.4.1	Flood Risk	It is also important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor	The Applicant welcomes that East Suffolk Council supports the embedded measures to manage surface water drainage and flood risk. The poor

Reference	Matter	Point Raised	Applicant's Comments
		infiltration properties at the site due to the Ancient Estate Claylands landscape type. It is understood from Section 4.8.3 of Part 2 Suffolk Chapter 4 Water Environment (Version A) within the Environmental Statement [APP-051] that <i>‘Saxmundham Converter Station and Friston Substation would be served with drainage systems that embed SuDS for attenuation of runoff to green field runoff rates in line with the requirements of the receiving watercourse authorities (Internal Drainage Board, Environment Agency or Lead Local Flood Authority and provide treatment of runoff (Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk).’</i> ESC defers to the LLFA and EA on flood matters but supports the embedded measures, and a green field runoff rate is supported.	infiltration properties at Friston, in particular, are well understood by the Applicant and will influence the final detailed drainage design proposed in the Construction and Operational Drainage Management Plans to be submitted and approved post consent under requirement 6.
6.3.5.1	Public Rights of Way	In terms of Public Rights of Way (PRoW), the site is crossed by Footpaths 5 and 6 which would require temporary and permanent diversions to accommodate the proposed development. It is essential that any temporary or permanently diverted routes provide appropriate amenity for its users, being an integral component of the masterplan for the site, with any permanent diversion being established with the long-term future of the site fully considered (i.e. future converter station developments coming forwards) to avoid the need for subsequent diversions.	The Order Limits will be sufficient to accommodate the PRoW diversions required around the proposed Converter Station site as shown in <b>Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [AS-011]</b> . This includes a permanent PRoW diversion for PRoW E-491/005/0 (Footpath 5) around the Converter Station itself and a temporary PRoW diversion for PRoW E-491/006/0 (Footpath 6) to avoid a construction compound. These PRoW diversions will act in conjunction with one another to maintain PRoW connectivity with each other, as well as other existing (non-diverted) PRoW in the area. Further details are also provided within Table 5.1 of <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> , which identifies the PRoW diversions which will be in place. It should also be noted that the proposed PRoW diversions have been and will continue to be co-ordinated with other projects, such as LionLink, as necessary, to minimise the requirements for additional/ subsequent PRoW diversions around future converter station developments which could potentially come forward at a later stage.
6.3.6.1	Heritage	References to Wood Farm should be removed from the submitted Application reports as the building was de-listed on 12 <sup>th</sup> March 2025 following substantial fire damage. As there are no designated heritage assets within the Order Limits, the impact of the Saxmundham Converter Station on designated heritage assets will be through impact on their settings. The list of designated heritage assets included in the detailed assessment is accepted, however the existing baseline in Section 3.7 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050] should include the Saxmundham Conservation Area. The setting of the application site can be characterised by a combination of open agricultural land and patches of woodland, with the historic parkland of Hurts Hall to the west, all of which strongly contribute to the setting of the listed buildings and other surrounding heritage assets.	<p>This is noted by the Applicant. An updated assessment of Wood Farmhouse will be submitted before the end of examination.</p> <p>The assessment of Saxmundham Conservation Area is included in Section 3.9 and Section 3.11 of <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b>. The omission of the conservation area from the list of designated assets in the baseline Section 3.7 of that document does not affect the assessment of impact on that asset which is considered by the Applicant to be a robust and proportionate assessment of effects.</p>
6.3.6.2	Heritage	<p>A summary of ESC’s assessment of the impacts and effects on designated heritage assets is described in the table in the ESC LIR. The principal areas of disagreement are in relation to the impacts and effects on Hurts Hall and Hill Farmhouse:</p> <p>Hurts Hall (Grade II listed building): ES Assessment relies on Cultural Heritage Viewpoints, however Landscape Viewpoints support a higher magnitude of adverse impact (Particularly Updated Landscape Viewpoint 2 and Additional River Fromus VP B, both of which ESC understands will be submitted into the Examination by the Applicant at Deadline 1).</p>	This is noted by the Applicant. See further comments on the impact assessment for Hill Farmhouse at line 6.3.6.9 and Hurts Hall at line 6.3.6.10 below.



Reference	Matter	Point Raised	Applicant's Comments
		Hill Farm (Grade II listed building): ES Assessment relies on Cultural Heritage VP, however Landscape Viewpoints support a higher magnitude of adverse impact (Landscape Viewpoint 5 [APP-209]).	
6.3.6.3	Heritage	ESC has concerns regarding the harm that the converter station and the access over the River Fromus will cause to the significance of designated heritage assets which surround the site, due to the impact of the development on their setting. In particular, Grade II listed Hurts Hall and Hill Farmhouse, as well as the Saxmundham Conservation Area and Grade II* Church of St John the Baptist would be impacted through the changes in their settings.	This is noted by the Applicant.
6.3.6.4	Heritage	ESC notes that the ES combines the assessment of the Saxmundham Conservation Area and that of St John the Baptist's Church. St John the Baptist's Church is a Grade II* listed building, and while it is located in the Conservation Area and views toward the Conservation Area include the tower of the church, the impacts and effects on the church should be assessed separately.	A Technical Note has been prepared to outline the assessment of effects on the Church of St John the Baptist separate to its grouping within Saxmundham Conservation Area. This is set out in <b>Application Document 9.44 St John's Church Grade II* Listed Building Assessment [REP1-118]</b> .
6.3.6.5	Heritage	ESC notes that Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) <a href="#">[APP-050]</a> of the ES often identifies important views to and from designated heritage assets separately from the assets themselves. Views to and from a heritage asset may contribute to the significance of the heritage asset, as they are a visual expression of the setting of the asset, therefore when assessing the impact of the development on views to and from the asset, the assessment needs to consider how important those views are to the significance of the asset. Then, the significance of the effects of the scheme should be assessed in reference to the designated heritage assets themselves. For example, Section 3.9.104 states <i>'Recognising that the change is to the experience of a view and not to the heritage value of the conservation area, the impact is assessed to be small'</i> . Views contribute to the heritage value of the Conservation Area, therefore this sentence is not accurate. It would be more accurate to say <i>"the change is to the experience of a view towards the Conservation Area, which contributes to its significance, however the Conservation Area would not be physically impacted, and the impact through the change in the view to the asset's significance is assessed to be small"</i> .	The Applicant is in agreement with this and recognises that this does not materially alter the assessment of effects presented in effects to this asset. The levels of effects reported in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b> are unchanged.
6.3.6.6	Heritage	The assessment of the impact on the Conservation Area and on St John the Baptist concludes that the Saxmundham Converter Station and the permanent access over the River Fromus would be visible on the approach from the south (Paragraph 3.9.104). ESC considers that the Conservation Area and the church would be most impacted by the visual change to the rural approach to Saxmundham caused by the new access over the River Fromus. This would detract from their significance and would constitute a moderate adverse effect. ESC also agrees that the significance of the residual effect following landscape mitigation would be minor adverse, as the landscape mitigation would provide sufficient screening in views to the north (toward the Conservation Area and the church) to reduce the visual impact of the new access.	This is noted by the Applicant.



Reference	Matter	Point Raised	Applicant's Comments
6.3.6.7	Heritage	<p>The impact of the development on Hurts Hall would derive from the permanent access over the River Fromus as well as from the converter station. The new permanent access would introduce a new road that crosses its former parkland, a new bridge and new areas of tree and vegetation screening. The setting of Hurts Hall, i.e. the experience of its surroundings, contributes to its significance by providing visual connections between the Hall and its historic parkland from within its grounds and in views toward the Hall from the east/south-east, and by allowing its architectural interest and its prominence in the landscape to be appreciated. Views toward Hurts Hall from the east and south east are expansive, as shown by the large number of relevant Landscape Viewpoints: Landscape Viewpoints 2 and 20, and Additional River Fromus VP A-C, which ESC understands will be submitted into the Examination by the Applicant at Deadline 1. While the entrance of the Hall faces northward, it should be noted that the south and west façades are also principal façades, with prominent forward projecting bays. This is remarked upon in the listing description of the Hall. Therefore, the west and south aspects of the Hall are of particular importance. Additionally, while the landscape setting around the Hall changed throughout the 20th century, with more or less tree planting around the Hall at different points in time, and the formal gardens and lawn to the west and south of Hurts Hall are 21st Century additions, this does not undermine the historic and current importance of the western and southern aspects of Hurts Hall.</p>	<p>This is noted by the Applicant, see further comments on the impact assessment for Hurts Hall at line 6.3.6.10 below.</p>
6.3.6.8	Heritage	<p>Paragraph 3.9.116 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) <a href="#">[APP-050]</a> of the ES acknowledges that the permanent access and the converter station “<i>would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated parkland, and would be incongruous with the rural setting that contributes to its heritage value.</i>” ESC wishes to highlight that, with reference to Sections 3.9.113 – 3.9.116, the impact of the development on Hurts Hall has been separately assessed, firstly when viewed from within the grounds of Hurts Hall and secondly when viewed from the B1121, resulting in a minor adverse effect and a moderate adverse effect, respectively. As both of these views describe different aspects of the setting of Hurts Hall, it stands to reason that the overall effect of the development on Hurts Hall is a moderate adverse effect. It is unclear why two separate assessments have been made by the Applicant, which is akin to a landscape and visual approach and not an assessment of the significance of the asset itself which is what is required for a heritage assessment. ESC agrees that the overall impact of the development would have a moderate adverse effect on Hurts Hall.</p>	<p>This is noted by the Applicant. The Applicant's view accords with ESC that the overall impact on the heritage value of Hurts Hall would be moderate adverse at Year 1 of Operation.</p>
6.3.6.9	Heritage	<p>Hill Farmhouse (Grade II) is located to the south of the Converter Station site. Its setting, as an historic farmhouse, is characterised by its connection to the agricultural farmland surrounding it, as well as by the relative isolation of the farmstead, which has not been encroached upon by modern residential development. Its immediate setting is not particularly open, as it is largely surrounded by a small woodland, however this woodland is not very deep, nor is it consistently dense. It is also inaccurate to say that the house is not perceptible from the wider landscape. In reference to Section Application</p>	<p>The assessment of Hill Farmhouse presented in Paragraph 3.9.117 of <b>Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]</b> and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of <b>Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]</b> include robust consideration of the degree to which the surrounding agricultural landscape contributes to the significance of the asset and the degree to which it is sensitive to visual intrusion resulting from the Proposed</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>Document 6.4.2.3.8-D 'Representative Viewpoint Visualisations' of Part 2 of the Cultural Heritage Figures for Suffolk <a href="#">[APP-230]</a> this depicts a view toward the farmhouse, rather than from the farmhouse. Within this static viewpoint the proposed converter station is shown to be screened by the existing trees and by the farmhouse itself. However, in Landscape Viewpoint 5 in Part 2 of the Landscape and Visual Figures for Suffolk <a href="#">[APP-209]</a>, where Hill Farmhouse is just cut off on the lefthand side of the picture, the proposed converter station would be prominently visible with the farmhouse in the foreground, particularly in winter. This demonstrates that the wider setting of Hill Farmhouse would be affected, even with the mitigation planting at 15 years. It also shows that during winter, the woodland area around Hill Farmhouse is much less dense, and the largest parts of the Converter Station are likely to be visible from within the grounds of the house. ESC considers that Hill Farmhouse is an asset of medium sensitivity, in the terms of the ES Methodology, and that the magnitude of impact on Hill Farmhouse would be medium adverse, even after the landscape mitigation. Therefore, ESC disagrees that there would be no impact on Hill Farmhouse, and instead considers that there would be a moderate adverse effect on Hill Farmhouse.</p>	<p>Project. It highlights the enclosed nature of the asset's setting, being largely screened from view due to the boundary planting in its immediate curtilage. Views of the asset in the surrounding landscape are not a feature of its setting that contributes to significance. Viewpoint CH3 in <b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</b> taken from the south of the asset looking north towards the proposed Saxmundham Converter Station. This demonstrates both the asset's lack of visibly and the lack of visibility of the Proposed Project which would sit behind it in the view. With reference to Landscape Viewpoint 5 in <b>Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]</b>, it is the Applicant's view that this viewpoint further demonstrates the lack of contribution that is currently made by visual setting to this asset, however, since Hill Farmhouse is located off the far left of the view an image with slightly adjusted extents has been provided as Appendix 1 to this document. This shows the building is largely screened by trees and demonstrates that the view does not provide understanding of its heritage value as a 17<sup>th</sup> century L-plan farmhouse with later alterations. Therefore, although the proposed Saxmundham Converter Station will feature prominently in this view, it is not a key view, or otherwise important view towards the asset where its heritage interests are conveyed and / or understood. The Applicant therefore reiterates the assessment that the Proposed Project will not result in any impact to the heritage value of this asset through change to its setting and no effect and no harm is identified.</p>
6.3.6.10	Heritage	<p>ESC considers that the landscape planting proposals will serve to mitigate the harm identified to the Saxmundham Conservation Area and St John the Baptist, however it is not considered that the landscape planting would reduce the magnitude of the adverse impact on Hurts Hall and on Hill Farmhouse. It is implied that the ES refers to the Cultural Heritage Viewpoints (contained in <a href="#">[APP-229]</a> and <a href="#">[APP-230]</a>) when it assesses the residual effects of the Suffolk Onshore Scheme at year 15 operation, however it is critical to include the Landscape Viewpoints (particularly the updated Landscape Viewpoints 2 and 20, and the Additional River Fromus VP A-C, all of which ESC understands will be submitted into the Examination by the Applicant at Deadline 1), as these show how expansive and wide-reaching the views toward Hurts Hall are from the east and south-east, both from public footpaths and from the B1121. It should also be noted that the landscape looks substantially different in winter and summer, and that the visualisations for Summer year 15 would be the best-case scenario, which would only be in place part of the year. Visualisations for Winter year 15 have not been provided. Similarly as noted above, Landscape Viewpoint 5 <a href="#">[APP-209]</a>, where Hill Farmhouse is just cut off on the lefthand side of the picture, shows that even in winter, the Converter Station would be very prominent presence in the setting of Hill Farmhouse, even in Summer year 15.</p>	<p>Application Document <b>Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b> provides the assessment of the effects to Hurts Hall and it is confirmed that this assessment made use of all available and relevant viewpoints and visualisations at the time of writing to assess the scheme together with observations made during site visits. Whilst viewpoints taken specifically for LVIA are useful for consideration of kinetic views available through the surrounding landscape and of and towards heritage assets, it is not considered that in all cases these provide key views of assets that contribute to their heritage value, nor do they all relate to key views identified in local policy such as the Saxmundham Conservation Area Appraisal (East Suffolk Council 2016) or the Saxmundham Neighbourhood Plan (2023). The Cultural Heritage Viewpoints (contained in <b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 1 of 2 [APP-229]</b> and <b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</b>) were therefore specifically prepared in addition to the Landscape viewpoints to allow for the assessment of changes to key views. They are considered more relevant to the heritage assessment for these reasons and this explains why they are specifically referred to when assessing the impact of the Proposed Development.</p>
6.3.6.11	Heritage	<p>ESC considers that the magnitude of the impact would remain at a medium level for both Hurts Hall and Hill Farmhouse, as the incongruent scale of the Converter Station would not be mitigated by the proposed landscaping. The visual mitigation of the proposed landscaping around the new permanent access and bridge over the River Fromus would vary in different seasons, and would only soften, not remove, their visual impact in the setting of Hurts Hall. In reference to <i>Suffolk Coastal Local Plan Policy SCLP11.4: Listed Buildings</i>, the development is of a scale and character that is incongruent with the setting</p>	<p>The updated Viewpoints 2 and 20, and the additional River Fromus Viewpoints A-C <b>Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]</b> provide further views towards Hurts Hall both from within the wider landscape and using an updated illustrative model. These viewpoints have been reviewed and they are not considered to alter the assessment of effects to Hurts Hall presented in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</b>.</p>

Reference	Matter	Point Raised	Applicant's Comments
		of the surrounding heritage assets, and therefore does not meet the requirements of the Local Plan Policy.	The reduction in the residual significance of effect reported in Section 3.11 <b>Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b> in relation to Hurts Hall as a result of the maturation of screening vegetation at Year 15 of Operation is mainly related to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the asset's setting. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in the residual minor adverse significance of effect assessed at Hurts Hall.
6.3.6.12	Heritage	It should also be noted that Table 3.13 of Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) <a href="#">[APP-050]</a> does not accurately refer to heritage assets as receptors. 'The approach from the south to Saxmundham Conservation Area' is not a heritage asset. This should read 'Saxmundham Conservation Area'. Additionally, 'Views of Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077) from the B1121' is not a heritage asset. This should be 'Hurts Hall Grade II Listed Building and Associated Parkland (NHLE1268178; SXM017; SXM077)	The Applicant is in agreement with this and recognises that this does not materially alter the assessment of effects presented in Table 3.13. The levels of effects reported in <b>Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b> are unchanged.
6.3.7.1	Noise	As stated in Section 7.4.5 of this LIR, ESC's stance with regards to operational noise is that a rating level of at least 5dB below the typical background should be the target. Any deviation from this level will require robust justification and the aim should still be to achieve the lowest possible sound level. 5dB below background sound level is the standard starting point for ESC for all developments where noise impact is a consideration. However, this is in accordance with the determination of significance of effect in BS4142 where a below background sound level rating level is indicative of a low impact, depending on context. It is ESC's view that projects of this size and nature should be aiming for a low impact in accordance with the principles of NPS EN-1. If a low impact is not achievable then robust justification should be provided for the noise level that is, focussing on why it is the lowest that can reasonably be achieved. If agreed this should form the basis of an operational noise level requirement.	The Applicant notes this comment and agrees in principle. This is captured within commitment NV07 of <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments [REAC] [REP1-102]</b> .
6.3.7.2	Noise	ESC has reviewed the operational noise assessment <a href="#">[AS-119]</a> which makes some reasonable assumptions and forms the basis for ongoing discussion. That said, ESC will require appropriate noise rating levels to be proposed at all, or a selection of, representative noise sensitive receptors (NSRs), to form the basis of an operational noise limit requirement in the DCO. This is necessary to allow noise levels from the project to be verified and provide a basis to regulate the converter station in the event that complaints are received in the future. It is accepted that as Saxmundham is a co-located site, and this introduces certain issues in terms of differentiating noise levels from multiple sources, and this will need some discussion going forward. However, this does not remove the need for appropriate operational noise limits to be set. Even with rating levels agreed, ESC will expect a commitment to go lower, if possible, in the final detailed design and that this will also be included in the operational noise requirement.	The Applicant acknowledges the comment raised. A further response will be provided at a later deadline.
6.3.7.3	Noise	It is understood that BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound (BS4142) in respect of operational noise assessment has been applied. The acoustic character of the area is quiet, rural residential in nature and this application and development has the potential to introduce a persistent commercial and industrial noise into that character. This should hold considerable weight in terms of context for the	A thorough discussion of context, including the quiet rural nature of the site, is provided in the operational noise assessment presented in <b>Application Document 6.3.2.9.D Appendix 2.9.D Suffolk Operational Noise Assessment [AS-119]</b> .



Reference	Matter	Point Raised	Applicant's Comments
		considerations required by BS4142 when assessing the significance of impact in addition to assessed and modelled noise	
6.3.7.4	Noise	The Applicant has previously stated that it is their aim that the development, if consented, will have a rating level below background sound levels which broadly accords with ESC's expectations in this regard subject to those levels being agreed. Due to the low background sound levels in this area, particularly at night, it is extremely important that noise levels from the development are prevented, mitigated or minimised to ensure these background sound levels are not subject to 'noise creep'. This is particularly important given this site's potential as a co-location site for at least one other similar project, making the reduction of individual project impact key to the prevention of cumulative impact. It is not enough to say that future impact is the responsibility of future projects, and it must be taken account of now. The adoption of below background rating levels will effectively aid the prevention of cumulative noise impact by preventing the increase in background sound level that future projects would adopt for their assessment.	The Applicant acknowledges the comment raised. Further detailed response will be provided at a later deadline.
6.3.7.5	Noise	If a below background rating is not possible then the applicant needs to propose an operational noise rating level that is the lowest they can reasonably achieve with full justification as to why that is the case. This rating level, determined using BS4142 in order to take account of any acoustic character to sound emissions and, importantly, the local context, will also need to be secured via a DCO requirement. In addition, ESC will require a firm commitment to reduce the rating level further at the detailed design stage if it is possible to do so. Operational Noise reduction must be a fundamental design principle, and this should be clearly stated in the relevant DCO documents so that the project is accountable at implementation stage.	The Applicant acknowledges the comment raised. Further detailed response will be provided at a later deadline.
6.3.7.6	Noise	The applicant also refers to absolute levels in Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109], and this is assumed to mean that a site noise level of 35db may be considered. Whilst it is accepted that BS4142 allows for consideration of absolute levels in certain circumstances, the cumulative potential for this site and the current character of the area means that all efforts should be made to prevent background sound level creep, which the adoption of a 35dB site level would not. An absolute level would also not take account of any acoustic penalties that a rating would, and given the types of plant to be used, tonality, impulsivity and intermittency are all likely to be considerations. If this is to be considered in line with section 11 1) of BS4142, ESC will require a robust assessment to show that adoption of absolute levels is as or more protective than rating levels and would require consideration of acoustic character of those levels in line with section 11 2).	<p>A ≤34 dBA noise rating level threshold would be considered to the Lowest Observed Adverse Effect Level (LOAEL). Therefore, this would be considered the lower threshold for adverse effects with regards to national planning policy. The Applicant's aim is therefore for operational noise levels to be at or below this level, as a minimum to meet the requirements of national planning policy. Additionally, the Applicant seeks to aim to achieve the requirements of the local authority (which are above and beyond the requirements of national planning policy guidance), where this is feasible, or otherwise as low as reasonably possible.</p> <p>With regards to 'noise creep', the Applicant considers that the ≤34 dBA noise rating level threshold should apply cumulatively to this Project and future projects. This would ensure that 'noise creep' does not exceed the LOAEL and therefore would not cause an adverse effect cumulatively. It also provides an incentive for the applicant to aim to reduce noise levels from this Project as far as practicable.</p>
6.3.3.7	Noise	Furthermore, the matter of background sound level creep remains an issue at the co-located site and needs to be addressed if any operational noise levels are to be above background. The cumulative impact with the NGV LionLink project needs to be considered along with a third comparable project given the site is scoped for three projects, albeit with the NGV Nautilus project now set to connect at the Isle of Grain in Kent, rather than in East Suffolk. Where a development is consented that introduces an increase to the background	Please see response to 6.3.3.6 above. Additionally, it is considered that the local authority may require future projects to assess their projects against the pre-development background sound levels determined by the Sea Link Project. This would avoid assessment against higher background sound levels. This, however, would not be withstanding the cumulative LOAEL threshold described above.



Reference	Matter	Point Raised	Applicant's Comments
		<p>sound level from the additional noise it creates from an above background rating level, the background is effectively increased by that amount as a result. Not only that, but a precedent is also set, especially in respect to projects such as this, in terms of what can be consented in respect to noise impact in future. Each project may also comply with the policy requirements of impact significance in terms of Lowest Observable Adverse Effect Level (LOAEL) and Significant Observable Adverse Effect Level (SOAEL) but overall, the background is increased by an amount that a single project would never be allowed. It is not only possible but very likely that further co-located projects will base their assessments on the new background and require a similar allowance in noise impact. This becomes cumulative and whereas a single project increasing the background sound level by a single amount may not be significant a second and in this case potentially third increase of the same amount becomes significant over time in relation to the current very low background sound level. It is therefore ESC's view that the lowest possible increase on background, and preferably a rating level below background, be applied to ensure that noise levels are not sequentially and cumulatively increased significantly whilst being accepted under policy due to the individually less significant increase, in order to protect the residents and acoustic character of the area.</p>	
6.3.8.4	Landscape and Arboriculture	<p>ESC agrees with the conclusions presented in Tables 1.11 and 1.12 of <a href="#">APP-048</a> in relation to the converter station site, with the following exceptions:</p> <ul style="list-style-type: none"><li>• VP1: Could be better mitigated (see Paragraph 6.3.8.6 and Figure 2 below);</li><li>• VP5: Could have more mitigation planting, but there are limited opportunities given the area of land available. The impact will begin to usefully lessen after Year 15;</li><li>• VP20: Could have more mitigation planting but there are limited opportunities given the area of land available. The impact will begin to usefully lessen after Year 15; and</li><li>• VP21: Year 15 assessment should be Major/Moderate Adverse unless the mitigation planting establishes very quickly.</li></ul>	<p>The general agreement with the Landscape and Visual Impact Assessment (LVIA) assessment findings is acknowledged. It should be noted that the landscape mitigation proposals were presented multiple times to stakeholders for discussion in pre-application landscape and visual thematic meetings and the proposals around the Saxmundham Converter Station remain very similar to that presented in the Preliminary Environmental Information Report, and these specific points were not raised except in relation to additional landscape planting adjacent to the B1119.</p> <p>Comments regarding mitigation planting and VP1 are provided under section 6.3.8.6 below.</p> <p>The request for additional mitigation planting in relation to Viewpoint 5 is noted. Native woodland planting, along with the strengthening of existing vegetation using native woodland species is proposed to the south and east of the proposed Saxmundham Converter Station. This has been balanced against the drainage requirements to the south of the proposed Saxmundham Converter Station which reduce the land available for planting; however, a meaningful depth of mitigation planting is achievable. Due to landform changes, the presence of mature existing vegetation to the south, and the stakeholder agreed planting heights shown in the year 15 visualisation, the proposed landscape planting would be less perceptible in views.</p> <p>The request for more mitigation planting in relation to Viewpoint 20 is noted. The proposed mitigation planting has been maximised to the west of the proposed Saxmundham Converter Station whilst respecting the setting of Hurts Hall and siting the converter station as close as possible to the southwestern corner of the field.</p>

Reference	Matter	Point Raised	Applicant's Comments
			Regarding the Year 15 assessment of Viewpoint 21, the assessment reports a moderate adverse (significant) effect ( <b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</b> ). It is considered that the major adverse (significant) effect reported at Year 1 of operation would be reduced as a result of the landscape planting proposals maturing.
6.3.8.5	Landscape and Arboriculture	The ExA should be aware that ESC did not request that the proposed River Fromus bridge should be moved further north to avoid the veteran tree during the pre-application stages of this application. ESC asked that full account should be taken of the status of the veteran tree and that it should be properly protected. ESC is mindful that moving the River Fromus crossing northwards to its current position impacts upon other disciplines (i.e. heritage impacts on Hurts Hall) as discussed in this LIR.	Comments are acknowledged, avoiding the arboricultural constraints in this area required the relocation of the bridge to the north. The proposed location has been determined as the preferred location taking into account a holistic assessment of the impacts and feedback received from stakeholders.
6.3.8.6	Landscape and Arboriculture	<p>In contrast to the negative aspects, there does also appear to be various positive aspects in landscape terms. A comprehensive Outline Landscape and Ecological Management Plan (OLEMP) has been submitted and this is the result of extensive consultation and discussion with the local authorities and other stakeholders. ESC is generally satisfied that, subject to final detailed agreement, this is likely to be the best approach to achieving success in establishing mitigation and new green infrastructure planting.</p> <p>That said, ESC believes that there are additional landscape planting areas that could have been included and which would have achieved enhanced screening at key viewpoints including VP1, VPs along B 1119, and VP6. Particularly important will be the adoption of an adaptive landscape maintenance programme which will ensure that all new planting receives the full required programme of maintenance regardless of how long it takes for the plants to successfully establish. This will also better ensure that planting is carried out successfully from the outset in order to minimise any prolonged maintenance requirement.</p>	<p>Comments around the extensive consultation and discussion and <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]</b> are acknowledged. As noted, the detailed LEMP would be provided at the detailed design stage.</p> <p>Figure 2 is presented underneath paragraph 6.3.8.6 therefore the comments around additional landscape planting areas are assumed to relate to this diagram.</p> <p>With reference to area ‘A’ on Figure 2, landscape planting proposals were designed to provide adequate screening and softening of views towards the proposed Saxmundham Converter Station with appropriate separation from Hurts Hall. The purpose of this planting would be to “<i>reinforce the planting between the Converter Station site and Hurts Hall</i>” (taken from ESC supporting text to Figure 2). From a heritage perspective, this area was not historically wooded and the strip of trees to the north is a historic tree-lined route between Hurts Hall and Wood Farm, as shown on 19<sup>th</sup> century OS maps, that is still legible in the landscape. The introduction of trees into area ‘A’ south of this route would alter its understanding and introduce change to the setting of Hurts Hall, degrading historic integrity and legibility of the historic park that originally formed its setting.</p> <p>The purpose would also be to provide “<i>additional screening for views from B1121 in the context of Hurts Hall</i>” (also taken from ESC supporting text to Figure 2) however when viewed from Viewpoint 2, located on the B1121 (refer to <b>Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]</b>), the planting would read as a slight extension to the mature vegetation to the east of Hurts Hall and would not provide any screening or softening of views towards the Saxmundham Converter Station. From Viewpoint 20, to the west of the B1121, the planting would provide some additional planting in front of the proposed Saxmundham Converter Station however this would have a very limited effect as it would be partially set behind the existing intervening vegetation around Hurts Hall and partially set in front of the existing mature vegetation cover of Bloomsfield’s Covert.</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>As demonstrated within <b>Application Document 9.48 River Fromus Visualisations [REP1-298, REP-1-299 and REP1-300]</b>, from other locations to the west of the B1121 planting area 'A' would not provide any screening or softening of views towards the Saxmundham Converter Station.</p> <p>The Applicant therefore considers that additional mitigation planting in location 'A', would result in adverse cultural heritage effects and limited landscape benefit.</p> <p>With reference to area 'B' on Figure 2, this would entirely enclose views along the existing Public Right of Way (PRoW) and restrict views to the wider landscape. This is not considered to be appropriate and landscape planting in the direction of the proposed Saxmundham Converter Station has been provided to soften views towards the lower parts of infrastructure.</p> <p>With reference to area 'C' on Figure 2, this planting has been discussed between the Applicant, East Suffolk Council and Suffolk County Council. 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 <b>Application Document 9.34.2 Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]</b>.</p> <p>The commitment to adaptive management is secured in 7.3 of <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b>.</p>
6.3.8.7	Landscape and Arboriculture	The Converter Station site has been cleared of almost all former woodland and hedgerows and field boundaries since the 1960s, and the proposed early planting and new screening will see the return of woodland areas, and other trees and hedgerows to the locality. Long term river valley woodland planting will not only help screen the Fromus crossing bridge and approach route but will also provide a lasting long-term benefit to the character of the river valley landscape which may be regarded as a preferable alternative to the current relatively short-term rotation cropping of cricket bat willow plantations. New planting will be a necessary addition to the local green infrastructure network, enhancing wildlife connectivity.	The positive comments around the landscape mitigation proposals are acknowledged.
6.3.8.8	Landscape and Arboriculture	If the project is consented, ESC will expect NGET to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a Requirement within the DCO.	<b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b> sets out at paragraph 5.8.1 that where planting areas do not conflict with construction compounds and activities,



Reference	Matter	Point Raised	Applicant's Comments
		Early planting is not uncommon for other projects in this area, ESC would like to highlight the pre-construction planting agreed under the SPR consents around the Friston substation as an example of this. In addition, and in reference to the Friston substation (discussed later in this LIR), ESC will not support a scenario whereby the mitigation planting delivered under one project's consent (i.e. SPR's proposed Friston substation mitigation planting) is subsequently harmed and its function diminished by another project following it (i.e. Sea Link's HVAC cable route crossing SPR's proposed substation mitigation planting).	<p>advanced planting will be undertaken in the first available planting season prior to construction commencing. This is also set out in relation to LV13 in <b>7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b>.</p> <p>The Proposed Project will not diminish the function of the landscape mitigation set out for the consented EA1N and EA2 DCOs. The approved outline landscaping 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 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>
6.3.8.9	Landscape and Arboriculture	ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter <a href="#">[CR1-004]</a> and detailed in the Change Application Consultation Document <a href="#">[CR1-003]</a> . ESC understands that under Change 5, the Applicant is proposing to widen the strip of land south of the B1119 (north of the converter station site) to provide additional space to plant the proposed new hedge and subsequently maintain the hedge and ditch. As noted in its response to the consultation on the proposed changes, ESC had hoped that this change would help to address concerns it has previously raised regarding the lack of space along the B1119 to accommodate the necessary mitigation planting for screening views of the converter station from the north/northeast. However, the changes do not go far enough and instead would only achieve better hedgerow and ditch maintenance access. ESC considers that wholesale revisions to the B1119 and Fristonmoor Lane planting such that it goes beyond hedgerows and becomes multi-species tree belts should be brought forward by the Applicant to achieve more effective screening. Such tree belts need to be at least 15m, if not 20m, wide to be fully effective. It should also be noted that this part of the project is located at a relatively high elevation in the District and the new development will be both very visible and intrusive. This location	<p>Refer to the Applicant's response to Reference 9.3.8.6 above.</p> <p>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 <b>Application Document 9.34.2 Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]</b>.</p> <p>The Applicant considers that the approach to hedgerow and tree planting along the B1119 provides an appropriate landscape mitigation treatment in addition to the belts of woodland proposed around the Saxmundham Converter Station. 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.</p>



Reference	Matter	Point Raised	Applicant's Comments
		demands comprehensive landscaping which it is suggested should comprise intensive tree cover. Indeed, this proposed change could have provided the Applicant with the opportunity now properly to address this important issue of making provision for suitable, comprehensive mitigation planting for successful screening at this location, but it falls short. The area should be increased to accommodate further landscape mitigation when the change request is made.	
6.3.9.1	Ecology	The proposed converter station site lies on arable land to the east of the River Fromus, with an access road from the B1121 crossing the river being required as part of the project. The access road route will go through an area of plantation woodland on the western side of the river. Section 2.7.75 'Future Baseline' within Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Version B) <a href="#">[PDA-017]</a> states that ' <i>areas of plantation within the Order Limits, such as the plantation woodland to the west of the River Fromus, would be felled in the normal course of maturity, and either replanted or put down to other habitats. The plantation west of the River Fromus would be felled prior to construction of the Suffolk Onshore Scheme</i> '. It should be clarified whether this will occur or not as it will influence both the assessment of the impacts which will arise from the project (including on protected species such as bats) and also the Biodiversity Net Gain (BNG) calculations which are required.	<p>It is the Applicant's understanding that the plantation at the River Fromus is being cleared by the landowner in the normal course of management, unrelated to the Sea Link project, so will likely have a different habitat type when Sea Link approaches construction.</p> <p>However, to ensure assessment of a worst case scenario, this area was included in the BNG assessment as its current baseline habitat type and not as felled woodland within the metric. This habitat classification may change upon the completion of the detailed design metric to account for any changes in the habitat type.</p>
6.3.9.2	Arboriculture	In addition, ESC notes that Section 2.3.8 within <a href="#">[PDA-017]</a> states that ' <i>It was also at that the 17 September 2024 meeting that the Councils requested consideration of the realignment of the proposed bridge over the Fromus further north, in order to preserve a veteran tree. The alignment of the bridge over the River Fromus was amended in response to this feedback</i> '. This is an inaccurate representation of the discussion which took place at that meeting. As noted above, it was not requested that the proposed crossing should be moved further north. It was requested that the crossing must avoid impacts on veteran trees, however no preference was expressed as to whether a move north (or south) was appropriate. ESC appreciates that a number of different material considerations, including ecological impacts, are relevant when considering the proposed crossing design and location and an ecological preference was not expressed at that time, beyond that the crossing must avoid impacts on veteran trees.	Clarification on ESC position is noted.
6.3.10.1	Masterplanning	ESC has actively supported and engaged with the opportunities offered by NGET on master-planning, but considers significant further work is essential. The Order Limits are a critical element of achieving a strong design led masterplan, and overly constrained Order Limits create limitations. ESC is aware of concerns and comments from other stakeholders about the Order Limits including Benhall and Sternfield Parish Council, specifically concern about the safety of vulnerable road users and the need for the Order Limits to be sized to accommodate the necessary mitigation and safety measures to address these concerns. ESC defers on highways matters to Suffolk County Council as the Local Highway Authority, but reiterates the need for the project to fully mitigate for potential impacts and maximise opportunities for long-term enhancement and to ensure that legacy opportunities are maximised, including improved connections and linkages for ESC's communities. An important part of this is considering the Order Limits and the flexibility to include potential mitigation.	<p>The Proposed Project's Order Limits have been developed to provide flexibility to deliver the detailed design of all elements of the Project, including enhancement and mitigation measures. The Applicant therefore considers that the extent of the Order Limits is appropriate for the Project.</p> <p>The Applicant has considered future masterplanning of the Saxmundham Converter Station through a design process resulting in the Saxmundham Converter Station being part of a wider master-planned site, with the capacity to accommodate up to three converter stations. This process has been undertaken in consultation with ESC. The masterplan (See Appendix A of <b>Application Document 7.10 Coordination Document [APP-363]</b>) demonstrates how up to three converter stations could be developed, taking account of the likely phasing of works and the location of construction compounds, and the strategy for mitigation planting, access roads and retention of PRoW that exist within and surrounding the site, and drainage.</p>

Reference	Matter	Point Raised	Applicant's Comments
			However the Order limits for the Sea Link DCO do not include the land required to deliver the wider masterplan. The other projects considered as part of the masterplanning design process will have their own Order Limits developed separately as part of their future consenting applications.
6.3.11.3	Access to Converter Station – River Fromus Crossing	The proposed Fromus crossing on the confirmed western access route remains a concern for ESC as it will require significant intrusive engineering and design work which presents a substantial challenge to NGET to deliver, along with the associated expense. At the last round of pre-application consultation, being ESC's last formal engagement on the selected access route prior to submission, ESC stressed that robust justification is required for ruling out the alternative accesses, noting the delivery of the Fromus crossing will require significant engineering works, the full detail of which had not been clearly set out. The confirmed western access has the potential to create significant environmental, landscape, and heritage issues, as discussed in the previous sub-sections of Section 6.3 of this LIR.	<p>The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. Based on ongoing engagement with stakeholders, the Applicant then further considered a total of five alternative accesses as shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in <b>Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206]</b>, concluding that the western access remained the preferred option for the reasons set out in paragraphs 3.8.3 to 3.8.18 in <b>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]</b>.</p> <p>The five accesses considered comprised:</p> <ul style="list-style-type: none"><li>• An access from the west (from the B1121 south of Saxmundham);</li><li>• An access from the north (from the B1121 north of Saxmundham);</li><li>• An access from the south (from the A1094);</li><li>• An access from the east (contiguous with the temporary cable haul road); and</li><li>• An access which utilised the proposed Sizewell Link Road (or B1122).</li></ul> <p>All access options are in proximity to heritage assets, and all accesses require crossings of various types, with different access options interacting differently with roads, rail lines, watercourses, and/or public rights of way, and these all represent constraints which would require solutions.</p> <p>The proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits.</p>
6.3.11.6	Arboriculture	Existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction. Once the new edition is published, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. ESC notes that the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point has been assessed to have an RPA radius of 40m	This is noted by the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
		which acknowledges the recommendation for uncapped RPA radii for Veteran trees.	
6.3.11.7	Access to Converter Station – River Fromus Crossing	The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity. During the pre-application stage, the scale of the bridge over the River Fromus was increased in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. The increased construction activity and associated vegetation removal as a result has the potential to have a higher magnitude of effect on the Fromus Valley Landscape Character Area. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is a special quality and a feature of the Landscape Character Area.	Comments regarding views being opened up and assessment of the bridge height options should be referred to within Table 22.2.6 of <b>Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]</b> .
6.3.11.8	Access to Converter Station – River Fromus Crossing	In terms of heritage considerations, the new permanent access and bridge over the River Fromus as currently proposed would be an incongruous feature in the setting of Hurts Hall and on the approach to the Saxmundham Conservation Area. The open panoramic views of Hurts Hall enhance its prominence against the backdrop of its parkland and contribute to the rural approach to the Conservation Area. The mitigation planting would help to screen the new bridge within certain views, however it would not completely mitigate the introduction of this new infrastructure in the landscape. Further detail of ESC's position is detailed in Section 6.3.6 of this LIR	This is noted by the Applicant. See responses to Section 6.3.6 above.
6.3.11.10	Access to Converter Station – River Fromus Crossing	Within the made Saxmundham Neighbourhood Development Plan, 'Policy SAX12: Gateways, Views, and the Landscape Setting of Saxmundham' seeks to protect the scenic value of the landscape and countryside in the parish outside the defined settlement boundary of the town from development which may adversely affect this character. It goes on to say development which would have an unacceptable adverse impact on the landscape or character of the view concerned will not be supported, including in views from the B1121 looking across to Hurts Hall. These are important considerations when evaluating the potential heritage impacts introduced by this project on Hurts Hall.	Important views identified within Saxmundham Neighbourhood Plan (2023) have been considered in assessing the impact of the Proposed Development upon the Saxmundham Conservation Area and Hurts Hall Grade II listed building in <b>Part 2 Suffolk Chapter 3 – Cultural Heritage (Version A) [APP-050]</b> and in <b>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</b> .
6.3.11.12	Access to Converter Station – River Fromus Crossing	The western access also presents a number of concerns more generally regarding the access route to be taken by construction traffic. Specifically, regarding the use of Abnormal Indivisible Loads (AILs), the transportation of heavy plant for the purposes of grading the site and 'cut and fill' activities, and also the delivery of large cable drums (if these are not delivered to site via a haul road). Vehicles using the A12 would need to cross various culverts which have a maximum weight limit which requires detailed assessment. Additionally, the crossing of the rail line using the SCC owned asset Benhall Bridge presents another weight limit constraint, with this being understood to have a maximum bearing strength of circa 46 tons, significantly less than a 400kV transformer. ESC defers these matters to SCC as Highways Authority; however, ESC supports SCC's concerns. At the time of submission, the DCO application did not include the A12 junction, culverts and rail bridge at Benhall within the Suffolk Onshore Order Limits. However, ESC acknowledges that the Applicant is proposing changes to the Order Limits to include land around Benhall Railway Bridge to allow the Applicant <i>'to consider a wider range of possible ways of strengthening the bridge'</i> . As stated in its response to the	<p>Responses to comments on Abnormal Indivisible Loads and Benhall Rail Bridge have previously been provided within Table 2.23 ESC - Saxmundham Converter Station Access and River Fromus Crossing of the response to ESC RR (<b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>). Responses have also previously been provided within Table 2.2 Significant Issues and Table 2.9 Traffic and Transport of the response to SCC RR (see <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>).</p> <p>Further details relating to the potential impacts of the Proposed Project on Benhall Bridge, including with respect to temporary road closures, are set out within <b>Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]</b> submitted as part of Change Request 1. This concludes that any effects would be minor and not significant, given that the duration of any impacts would be short-term. This does not affect the</p>



Reference	Matter	Point Raised	Applicant's Comments
		consultation on the proposed changes, ESC welcomes the Applicant attempting to resolve a long-standing and obvious problem, but considers it disappointing that the Applicant has not provided an indication of its preferred option for navigating the issue. The views of Network Rail should also be sought by the ExA related to the Benhall bridge weight limit and the potential use of over bridging methods. At the time of writing this LIR, ESC notes that the use of overbridging methods by NGET, or statutory powers, has not yet been discussed in detail to a point where all parties agree, despite the ongoing efforts being made in the thematic meetings. ESC largely defers to Suffolk County Council as Highways Authority, but wishes to note its concerns regarding the lack of certainty in relation to the disruption created for the community by the works. It should also be noted that Document 9.19 <a href="#">[AS-138]</a> states in section 2.1.45 that <i>‘The area of land to the east of the B1121 is allocated for housing in the Suffolk Coastal Local Plan (Adopted September 2020); it is the site known as ‘Land South of Forge Close between Main Road and Ayden, Benhall’ (SCLP12.43). The land proposed for temporary construction and storage would include the majority of this allocated land. The temporary use of the site by the Applicant would not affect the long term development of the site for housing’</i> . ESC notes that ‘Outline Application with Some Matters Reserved - Erection of up to 41 dwellings (with details of access to be considered)’ (ESC application reference: DC/21/2503/OUT) was recently approved. It will therefore be for the Applicant to liaise with the landowner to seek an appropriate solution regarding any proposed use of that land and the timing of doing so.	<p>original conclusions set out within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b>, as no new or different likely significant environmental effects have been identified.</p> <p>It should be noted that the additional land to the east of the B1121 that was identified in <b>Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]</b> has subsequently been removed from the Change Request, given that planning permission has since been granted for housing on the site and in response to feedback received. The proposed option of installing a semi-permanent bridge has also been discounted from the Change Request as adjacent land was required to deliver this option.</p> <p>The reason two options have been retained is because the Applicant is investigating the potential to repair the bridge to provide an additional benefit to the project in the longer term. This has been considered as an option because it was discussed at a meeting between the Applicant, ESC and SCC so the Applicant is disappointed by ESC’s characterisation of this option as being the Applicant not indicating a preferred option.</p>
6.3.11.13	Access to Converter Station – River Fromus Crossing	Finally, ESC wishes to highlight to the ExA that the proposed site for the Sea Link converter station within the wider site masterplan selects the best and flattest site within the land parcel. This means that whilst the proposed access route and limited number of AILs and heavy plant associated with cut and fill activities may suit NGET’s project, this may not be the same position for NGV’s LionLink project which is 12 to 18 months behind Sea Link in the consenting process. As stated earlier, the Saxmundham site was selected, in part, for its capacity to co-locate more than one converter station. However, if the first project’s proposed access into the site does not meet the needs of subsequent projects who are utilising a plot requiring more cut and fill than Sea Link, it may render the access unsuitable for LionLink. The ExA should satisfy themselves that the proposed western access route is viable for a co-located and coordinated site in this regard.	<p>The Applicant been working with ESC and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated manner, and believes that the outcomes of this ongoing process of coordination should be tangible outcomes.</p> <p>The approach to coordination is presented in <b>Application Document 7.10 Coordination Document [APP-363]</b>. This document sets out how coordination has been considered in various ways and at all stages of the project and is summarised earlier in this document.</p> <p>At the Saxmundham site, the Applicant seeks the powers needed to deliver the Proposed Project. As the first project to be delivered Sea Link has been designed to be compatible with future projects, taking account of access from the highway, cable routing, mitigation, and the approach to construction compounds. All these factors have informed the site-wide masterplan that has been developed in dialogue with (amongst others) NGV, ESC and SCC. Subject to LionLink applying for and being granted development consent for its project in the way foreseen, this provides a range of opportunities for ongoing coordination. This includes coordination on the final design and appearance of the infrastructure and the approach to mitigation, and on ways to reduce the impacts of the construction phases themselves.</p>
<b>6.4 HVAC (Saxmundham Converter Station to Friston Substation)</b>			
6.4.2.1	Coordination	ESC understands that the HVAC cable route linking the proposed Saxmundham converter station site with the proposed Friston substation site was refined by NGET prior to submission to remove the LionLink project’s	The Proposed Project was developed in a way that embeds opportunities for the LionLink project (and, at earlier stages, the Nautilus project) to consider routing their own AC cables between the coordinated converter station site

Reference	Matter	Point Raised	Applicant's Comments
		cables, allowing NGV to fully consider and consult on the most appropriate AC cable route. Nonetheless, Sea Link has been designed to allow space for the future delivery of other projects. Section 4.2.28 within Part 1 Introduction Chapter 4 – Description of the Proposed Project (Version C) [AS-093] of the submitted Environmental Statement states <i>'Between the proposed Friston Substation and Saxmundham Converter Station the HVAC and HVDC cables for the Proposed Project would be combined within the same construction swathe, this is illustrated on DCO/S/DE/SS/1204 of Application Document 2.13.1 Design Drawings - Suffolk.'</i> The proposed HVAC connection description therefore contains no options which includes any proposed cable works for the LionLink project (in contrast to the proposed Friston substation section of the document which sets out different connection scenarios).	<p>and the network connection point at Friston (Kiln Lane) substation alongside those of the Proposed Project.</p> <p>This was consulted on at the statutory consultation stage, and the alignment of the cable Limits of Deviation with space to the north subsequently embedded in the Proposed Project design. Subject to the design requirements, assessment, and consultation outcomes of LionLink, opportunities therefore are retained to share a parallel cable route.</p> <p>Given the assumed likely proximity between the Proposed Project and the NGV interconnectors LionLink and (until March 2025) Nautilus, the Applicant has also previously considered the possibility of expanding the scope of the Proposed Project consent to include elements of these projects' works. There are various reasons why this is not pursued, not least because works which exclusively form part of the NGV projects do not fall within the scope of the Proposed Project which the SoS has directed into the DCO regime.</p> <p>However, subject to the delivery programme of the LionLink project, the powers in a future LionLink DCO, and other procurement, regulatory, and business interface challenges, there remains the possibility (albeit unlikely) that the ducts may be delivered together</p> <p>.</p> <p>This is set out in detail in <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p>
6.4.2.2	Coordination	The Coordination Document [APP-363] indicates that co-ordination takes the form of not precluding future projects from coming forward by leaving physical space along the HVAC cable route for up to two other projects. ESC does not consider this to be genuine co-ordination. Genuine co-ordination should seek to reduce the environmental, community, and socio-economic impacts of multiple projects coming forward at similar timescales and in similar geographical areas. NGET's decision to exclude cable ducts and infrastructure associated with NGV's project therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and Sea Link. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between Sea Link and the NGV projects will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV's assessments of the best cable route will be similar to those reached by NGET. ESC feels that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the Sea Link project, this could meaningfully reduce the environmental impacts of both projects.	
6.4.3.1	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	The current lack of co-ordination is of particular concern around the Friston substation in the context of HVAC cable routes leaving the Saxmundham converter station and heading to the Frison substation. An uncoordinated and piecemeal approach to the cable ducts associated with Sea Link and LionLink will result in multiple separate cable routes entering the Friston substation site, subsequently adversely affecting (or even removing) the mitigation planting around the Friston substation agreed under the East Anglia ONE North and East Anglia TWO project consents. The mitigation planting was required to reduce the visual impacts of the SPR (and NGET) substations consented under the SPR DCOs on the village of Friston. It is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding the co-ordination of cable routes between projects resulting in a greater number of routes chipping away at the consented mitigation. ESC notes that the ExA for the SPR projects states in Section 28.4.4 of the Recommendation Report (Volume 2 – Chapters 18-31 <sup>1</sup> ) that <i>'the local harm that the ExA has identified is substantial and should not be under-estimated in</i>	<p>The approach to cable routing on the approach to Friston (Kiln Lane) substation is not uncoordinated or piecemeal, nor has coordination been actively avoided. Coordination takes the form of ongoing collaboration between the various developers, so that the evolving designs can be developed in compatible ways which retain the functionality of the original SPR mitigation planting, while allowing other projects to progress.</p> <p>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>

<sup>1</sup> [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010061-EA2-Recommendation%20Report-Vol2\\_Ch18-31%20COMPLETED.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010078/EN010078-010061-EA2-Recommendation%20Report-Vol2_Ch18-31%20COMPLETED.pdf)

Reference	Matter	Point Raised	Applicant's Comments
		<i>effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. However, the benefits of the Proposed Development principally in terms of addressing the need for renewable energy development identified in NPS EN-1 outweigh those effects</i> '. ESC wishes to stress that whilst the overarching need case was found to outweigh the adverse effects introduced, the agreed mitigation across the projects were found to be <i>only just</i> sufficient. This reinforces ESC's view that it is unacceptable for the Sea Link project to diminish this mitigation planting.	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.
6.4.3.2	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the consented landscape mitigation. ESC has a strong preference for NGET to use horizontal directional drilling (HDD) to minimise adverse impacts on this landscape mitigation and this has been raised in multiple meetings by ESC officers prior to the submission of the DCO application.	<p>The Applicant is confident that detailed landscaping designs that accord with the EA1N/EA2 outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables.</p> <p>It is noted that ESC has previously raised the possibility of using HDD beneath elements of the SPR's landscaping. The Applicant has confirmed that this is not possible, see below for further detail.</p>
6.4.3.4	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	ESC understands that NGET are reluctant to HDD under the consented landscape mitigation for the SPR projects due to cost. The alternative, however, is open cut and fill trenching through the landscape mitigation. This goes against the fundamental principle of the landscape mitigation scheme, a required measure for the SPR consents to help mitigate landscape visual impacts in the vicinity of Friston village.	<p>The primary reason for the decision not to use HDD beneath the landscaping is not driven by cost.</p> <p>HDD is not a benign solution from an environmental perspective and in this context is considered to be more detrimental than open cut. HDD requires large working areas to be set up at the launch and receive pits when implementing trenchless technologies and, due to the increased depth of cables required for HDD and the additional construction space required, the greater cable separation further increases the working area at each end. The greater cable separation also means a greater area is required for the final cable easement as a whole. This means that the area where trees cannot be planted in the operational period would also be wider under this solution than for an open cut solution.</p> <p>HDD is not feasible beneath tree planting for National Grid cables (due to the depths that cables would need to be to achieve the required ratings) so HDD would not mean more tree planting could be planted or retained.</p> <p>Finally, it is not considered to be necessary to install using HDD, as the Applicant is confident that detailed landscaping designs that accord with the EA1N/EA2 outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables.</p> <p>The Applicant is working closely with SPR to understand the interactions with emerging detailed designs and minimise these where possible.</p>
6.4.3.5	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	Bearing in mind that NGET are not proposing any coordination in terms of laying cable ducts for LionLink at the same time as for Sea Link (as discussed earlier), NGET's justification of cost being the primary reason not to HDD under SPR's approved landscape mitigation would subsequently set a precedent for NGV's LionLink project, reducing the likelihood of NGV using	The Proposed Project was developed in a way that embeds opportunities for the LionLink project (and, at earlier stages, the Nautilus project) to consider routing their own AC cables between the coordinated converter station site and the network connection point at Friston (Kiln Lane) substation alongside those of the Proposed Project.



Reference	Matter	Point Raised	Applicant's Comments
		HDD methods at a later date (if consented). Any future desire for a coordinated HVAC to use HDD methods to avoid disruption to the landscape mitigation should not be restricted at this stage by NGET. Moreover, NGET is under statutory duties under section 38 and schedule 9 of the Electricity Act 1989 to have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and to do what can reasonably be done to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects. Cost is not, therefore, the only consideration and there is a statutory duty resting on the applicant to mitigate. By refusing to use HDD in this location, NGET is failing in its statutory obligations, getting the balance of its duties wrong, and infringing the section 38 and schedule 9 duties.	<p>This was consulted on at the statutory consultation stage, and the alignment of the cable Limits of Deviation with space to the north subsequently embedded in the Proposed Project design. Subject to the design requirements, assessment, and consultation outcomes of LionLink, opportunities are retained to share a parallel cable route.</p> <p>Given the assumed likely proximity between the Proposed Project and the NGV interconnectors LionLink and (until March 2025) Nautilus, the Applicant has also previously considered the possibility of expanding the scope of the Proposed Project consent to include elements of these projects' works. There are various reasons why this is not pursued, not least because works which exclusively form part of the NGV projects do not fall within the scope of the Proposed Project which the SoS has directed into the DCO regime.</p> <p>However, subject to the delivery programme of the LionLink project, the powers in a future LionLink DCO, and other procurement, regulatory, and business interface challenges, there remains the possibility (albeit unlikely) that the ducts may be delivered together.</p> <p>This is set out in detail in <b>Application Document 7.10 Coordination Document [APP-363]</b>.</p>
6.4.3.6	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	The SPR consents included a substation for each of the wind farm projects, and a substation for National Grid at the proposed Friston site. The National Grid substation consented within the SPR DCOs was not justified at that time for its capacity to accommodate connections for future projects at Friston, it was solely intended to serve the needs of the SPR EA1N and EA2 offshore wind farm projects. ESC wishes to highlight that the NGET and NGV projects, if coordinated and sharing a single HVAC cable route, would be required to split before entering the consented landscape mitigation, and effectively punch multiple holes through this due to the projects linking into the National Grid substation at different ends of the National Grid substation site. If HDD is not used to cross the mitigation planting areas, this scenario would leave large gaps in the landscape shielding efforts of SPR. Additionally, it is understood that mitigation planting cannot be placed over buried cable trenches due to root interaction with the cables, resulting in planting gaps in landscaping. Whilst ESC understands that SPR, NGET and NGV are currently exploring options for HVAC cable routing and installation methods. It is therefore highly likely given the current feedback from NGET that open cut trenching will be the preference for crossing SPR's consented landscape mitigation areas, and as explained above, this will dilute SPR's consented landscape mitigation planting areas which were a hot topic of debate at the examination hearings for those projects. Any such detriment in this regard would be a serious concern for ESC and the local community.	The Applicant is working with SPR and NGV to provide a mitigation planting layout that meets the needs of SPRs DCO and the requirements of potential future connections. Due to the reduced easement width, greater alignment flexibility and reduced construction area for open cut trenching when compared to trenchless installations over short distances, open cut remains the preferred option for installation of the cables within this area.
6.4.3.7	Sea Link's Interaction with Friston Substation and SPR's Consented Landscape Mitigation	It is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by actively avoiding coordinating cable routes between projects. ESC therefore continues to request that NGET review their position on this and includes the ability within their DCO to provide the ducting for the LionLink project and commit to the minimum number of HVAC cable	Having a single corridor for multiple projects would result in a wider, less flexible easement. Retaining flexibility and the ability to separate projects and circuits to suit the mitigation planting layout developed by SPR will provide a more suitable solution.

Reference	Matter	Point Raised	Applicant's Comments
		routes which would help to reduce unnecessary disruption to the local community, environment, and consented and secured mitigation planting.	
<b>6.5 Friston Substation</b>			
6.5.2.1	Coordination	ESC understands that the proposed works to the existing 4ZW 400 kV overhead line are shown in the Indicative General Arrangements Plans – Suffolk [APP-038]. Irrespective of the connection Scenario taken forwards, it is important that NGET and SPR work together to communicate any changes to proposed substation arrangements which deviate from those already consented for East Anglia ONE North and TWO. The reasons for any proposed changes in relation to the interactions of the projects in this regard will need to be understood. ESC asks NGET to explore every opportunity to coordinate the delivery of the Friston substation including looking to deliver the substation in one phase. If the substation could be built out to accommodate the consented SPR substation, the Sea Link and LionLink projects in one set of works rather than independently and successively, this could shorten the overall length of construction activity impacting local residents.	The Applicant will continue to work with SPR and NGV in developing plans for the Suffolk Substation, however the construction phasing of the substation and the Applicants ability to make efficiencies in the development phase will depend on the consenting situation of the projects at the time of construction.
6.5.2.3	Coordination	ESC remains concerned that NGET reduced the Order Limits, excluding the HVAC cable routes for NGV's LionLink project. The justification given is that other projects are working to different timelines to Sea Link, and also that the exclusion of other projects' infrastructure from the Sea Link redline does not preclude coordination, as the physical space will remain for other projects to use. This leaves the opportunity for promoters to carry out works in the same area in succession without a clear strategy for coordination, meaning the environment and local communities will be subject to successive impacts. ESC strongly believes that, whilst this may represent co-location, it is not co-ordination as the valuable benefits of co-ordination would not be realised.	The Applicant can only bring forward plans for the Proposed Project, with justifiable Order Limits for the works associated with that project. The Applicant will continue to work closely with NGV to enable coordination and colocation to occur as Sea Link and Lion Link progress through the consenting process.
6.5.3.1	Community Impacts	The local community has been subjected to a number of years of uncertainty as a result of the East Anglia ONE North and East Anglia TWO DCOs. It is essential that NGET appropriately engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject of previous NSIP proposals. ESC expects that suitable mitigation and compensation is fully explored and implemented in order to offset residual community impacts introduced as a result of this project.	A response to this comment can be found in <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b> .
6.5.4.1	Heritage	The impact of the National Grid substation on the surrounding heritage assets at Friston has been discussed at length by ESC and other stakeholders during the East Anglia ONE North and East Anglia TWO examinations. At the scale that the substation has already been considered, there will be adverse impacts of various magnitudes on Little Moor Farm (Grade II), High House Farm (Grade II), Friston House (Grade II), Church of St Mary (Grade II*) and the War Memorial (Grade II), and it will cause the loss of a historic track which is considered a non-designated heritage asset. Should the National Grid substation at Friston need to be extended, this would likely worsen the impacts on these heritage assets.	Noted. These comments relate to ESC's disagreement with the Cultural Heritage ES assessment provided for the consented East Anglia ONE North and East Anglia TWO projects. As acknowledged by ESC, assessment of these assets was scoped out of the Suffolk Cultural Heritage ES chapter in Paragraph 6.1.23 of <b>Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]</b> and no additional impacts through change to the setting of these assets are predicted as a result of to the Suffolk Onshore Scheme.
6.5.4.2	Heritage	It is understood that the designated heritage assets surrounding the Friston Substation site have been scoped out of the further detailed assessment in ES Chapter 3, as they were assessed as part of the consented EA1N/2 scheme. It should be noted, however, that ESC disagreed with the assessment of the	

Reference	Matter	Point Raised	Applicant's Comments
		significance of the effects on Woodside Farm (Grade II), High House Farm (Grade II) and the Church of St Mary (Grade II*) at that time.	See response above.
6.5.4.3	Heritage	ESC's assessment of the impacts and effects of the National Grid substation and East Anglia ONE North and East Anglia TWO developments are described in the LIR. ESC disagree with the ES with regards to the assessment of the impacts and effects on Little Moor Farm (Grade II listed building), High House Farm (Grade II listed building), Woodside Farm (Grade II listed building) and Church of St Mary (Grade I listed building)	
6.5.4.4	Heritage	Little Moor Farm has functional and historic links with the surrounding agricultural landscape, which contribute to its significance as an historic farmhouse. The relationship between the listed building and its farmland setting will be fundamentally changed by the introduction of industrial development of the scale proposed. The loss of the historic connection to the village core (including the historic PRoW) and the industrialisation of the open agricultural landscape to the south of Little Moor Farm would severely diminish the contribution that setting makes to its significance.	
6.5.4.5	Heritage	The impact of the proposed development on High House Farm would be similar to that on Little Moor Farm. The listed building has functional and historic connections with the surrounding open farmland, which enhance the rural character of its setting and allow for views across the fields to the village. The introduction of the large-scale industrial development within its setting would have a detrimental impact on the contribution that setting makes to the significance of High House Farm.	
6.5.5.6	Heritage	ESC disagrees with the Applicant's assessment that if only EA2 were to be constructed, the adverse impact would be of low magnitude, giving rise to an effect that would be of minor significance. ESC considers that regardless of whether only EA1N, only EA2 or both substations were to be built, the magnitude of adverse impact would be medium, giving rise to an effect of moderate significance. The agricultural character and openness of the site make an important contribution to the setting of Woodside Farm, as this setting supports the understanding of the building as a historic farmhouse with functional and physical connections to the surrounding farmland and allows views across the landscape. Any scheme which includes EA1N or EA2, individually or together, would interrupt the open agricultural setting of the listed building, and importantly, the National Grid Substation would also still be built.	
6.5.4.8	Heritage	ESC considers that the OLEMP <a href="#">[AS-059]</a> would not mitigate the harm caused by locating the substations in the setting of Little Moor Farm, High House Farm, Woodside Farm and the church. The proposed large areas of woodland have no historic precedent and merely have the effect of providing a barrier between these heritage assets and their historically open, agricultural setting. The OLEMP would not mitigate the loss of views from the north or the intrusion into the relationship between the church and the dispersed settlement around Friston Moor. While the proposed woodland would partially screen the industrial development, it would in itself be a barrier which obstructs the church's historically open, rural setting. The significance of the effect to Little Moor Farm, High House Farm, Woodside Farm and the church should be considered to be moderate to the farmhouses and major to the church in EIA terms even after mitigation.	



Reference	Matter	Point Raised	Applicant's Comments
6.5.5.1	Flood Risk	ESC draws attention to highlight the historical surface water flooding which has been experienced downstream in Friston. The village has been subject to surface water flooding on multiple occasions and Suffolk County Council as the Lead Local Flood Authority has undertaken Section 19 investigations under the Flood and Water Management Act 2010 which should be taken into consideration by the ExA. It is important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia ONE North and East Anglia TWO projects. ESC defers to the LLFA and EA on flood related matters.	<p>The flood risk sensitivities of Friston are fully acknowledged within <b>Application Document 6.8 Flood Risk Assessment [APP-292]</b>.</p> <p>SPR and the Applicant are liaising extensively on the design, layout and drainage of the Friston substation site.</p> <p>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 <b>Application Document 2.5.1 (B, version 2) Works Plans – Suffolk [CR1-007]</b> 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.</p>
6.5.5.3	Flood Risk	The ExA's Recommendation Report to the Secretary of State for the East Anglia ONE North and East Anglia TWO projects noted that a matter of concern throughout the examination was whether enough space had been provided within the Order Limits to prioritise a SuDS strategy for managing surface water, for both the construction and operational phases of the projects. ESC raised particular concern in the examination about the risk of surface water flooding during construction, given the areas used in construction would potentially be far greater than that during operation; large swathes of land would be stripped of topsoil and used for construction purposes including compounds and storage. All of these activities have the potential to increase surface water runoff rates and generate sediment which could have a detrimental impact to surface water flood risk in Friston. The lack of land availability was raised by Interested Parties in the examination as a concern in relation to the deliverability of drainage solutions. At that time, the ExA was unable to conclude that the construction drainage scheme would be satisfactory. The flood risk posed to the village of Friston during construction and operation was therefore a matter of great concern for the local community and was raised by multiple stakeholders and Interested Parties in the examinations for the SPR projects.	
6.5.5.5 – 6.5.5.6	Flood Risk	<p>ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter <a href="#">[CR1-004]</a> and detailed in the Change Application Consultation Document <a href="#">[CR1-003]</a>. ESC understands that under Change 2, the Applicant intends to adjust the limits of deviation for the proposed new substation at Friston (Kiln Lane) in line with the area consented for EA1N and EA2 to provide consistency.</p> <p>As stated in its response to the consultation on the proposed changes, ESC welcomes any attempt to achieve a degree of clarity and consistency around the proposals for the substation at Friston. However, it is queried whether the change does actually add consistency, as the Rule 9 Letter <a href="#">[PD-011]</a> notes that the limits of deviation presented do not in fact entirely align with those of EA1N Order.</p>	The Change Request has been submitted and accepted by the ExA (see <b>Application Document Applicant's request for proposed changes to the development consent order application and notice of variation to the examination timetable [PD-015]</b> ).
6.5.5.7	Flood Risk	ESC considers that this existing and well documented issue presents an opportunity for legacy project benefits, if the project is consented. Reducing existing and known flooding issues in the village of Friston would provide a lasting benefit for the local community and this should be fully explored over and above the requirements of the project. A legacy benefit of this nature	A response to this comment can be found in Table 2.22.8 of <b>Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]</b> .

Reference	Matter	Point Raised	Applicant's Comments
		would be supported by ESC, however, any such legacy benefit would need to be balanced against any other impacts introduced by the project.	
6.5.6.1	Noise	In relation to operational noise, ESC notes that Part 2 Suffolk Chapter 9 Noise and Vibration (Version B) <a href="#">[AS-109]</a> states ' <i>Although potential operational noise from the Friston substation was originally proposed to be included in the scope of the ES (other than noise from switch gear and auxiliary plant, which was agreed to be scoped out – see Scoping Report and Scoping Opinion) it has since transpired that there are no other potential sources of noise proposed during normal operation (i.e. there are no proposed transformers or similar plant). As such, operational noise from the normal operation of the proposed Friston Substation is not considered further within the assessment.</i> ' ESC does not agree as this substation is subject to a site rating level imposed by East Anglia ONE North and East Anglia TWO DCOs, therefore NGET needs to be very confident that the introduction of a further or different equipment will not impact that constraint. As identified above, it is important that the impact of the operational noise of the substation is considered in relation to nearby receptors including ecological receptors such as birds and other fauna.	This is noted by the Applicant.
<b>6.6 Construction and Maintenance Compounds</b>			
6.6.1.2	Context	SC has reviewed the indicative location of the construction compounds for the Suffolk Onshore Scheme (illustrated on Indicative General Arrangement Plans – Suffolk [APP-038]). ESC request that NGET seek to coordinate construction compounds with the NGV LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site. It is essential that the compounds remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to protect the amenity of nearby receptors.	The Applicant will continue to liaise with NGV and should both projects gain consent, opportunities for cooperation throughout construction will be identified and enacted where practicable.
6.6.2.1	Ecology	ESC notes that a refinement to the construction compound on land south of North Warren RSPB Reserve reduces the size of the compound and moves it further from the RSPB Reserve, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Sandlings Special Protection Area (SPA). It is understood that together with the Applicant's proposed noise and visual mitigation measures, the refinement seeks to address the disturbance impact on these designated sites and render them to be non-significant. Whilst the reduction and relocation of this construction compound to help address potential impacts on the designated sites is welcomed, it is noted that the noise modelling undertaken to inform the ES concludes that the noise disturbance threshold (60 dB LA Max) will be exceeded during the setup of the HDD compound (Paragraph 2.9.41 of Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Version B) [PDA-017]). Whilst this set up is only expected to take 1 month, in the absence of additional mitigation the ES concludes that the impact on feature bird species within the designated sites could be Moderate adverse. To address this impact the submitted CEMP requires that compound setup must be undertaken between September and January, outside of the nesting season for woodlark and nightjar. Only with all of the identified avoidance and mitigation measures implemented can the ES conclusion of Negligible, Not Significant effect from noise and visual disturbance on designated sites at this HDD compound be relied upon.	This is noted by the Applicant.

# 7. Applicant's Comments on Chapter 7: Project-wide Commentary – Thematic Topic Areas

## 7.1 Introduction

7.1.1 This section provides the Applicant’s comments on Chapter 7: Project-wide Commentary – Thematic Topic Areas.

## 7.2 Comments Table

Table 7-1 Applicants Comments on Chapter 7: Project-wide Commentary – Thematic Topic Areas

Reference	Matter	Point Raised	Applicant’s Comments
7.1 Landscape and Arboriculture			
7.1.3	Aftercare for reinstatement and mitigation planting	ESC notes from Section 1.6.3 within the Outline Landscape and Ecological Management Plan – Suffolk (Version B) <a href="#">[AS-059]</a> that ‘ <i>The contractor appointed by National Grid to construct the Suffolk Onshore Scheme will be responsible for establishing, managing and monitoring the implementation and establishment of landscape and ecological mitigation within the establishment aftercare period. National Grid will inspect and report on the success of establishment during this period.</i> ’ The proposed aftercare period for reinstatement and mitigation planting is noted, but it should be understood that ESC will be requiring this five-year period to also apply to all replacement planting that covers any plant failures. i.e., it should be a rolling five-year period for all planting from the time of planting. The limitations of replacing removed trees in a like for like basis in the vicinity of installed electrical cables is understood. ESC also highlights that Requirement 9 ‘Reinstatement schemes’ part 2 within the draft DCO (Version D) <a href="#">[AS-087]</a> states that ‘ <i>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</i> ’. ESC does not accept the 10m exception to the reinstatement of land, noting this would leave large gaps in hedgerows where in proximity to buried cables, causing habitat fragmentation. This element should be removed from the requirement.	<p>The commitment to adaptive management is secured in 7.3 of <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b>. The commitment to hedgerow reinstatement is also secured within the oLEMP at section 4.3.</p> <p>Requirement 9 relates to land used temporarily for construction. Where cables are installed as part of the Proposed Project, the Applicant will need appropriate land rights and controls in respect of the activities which can occur within proximity (both above and near) to the installed cables (for example tree roots), to a distance of 10m, to ensure that the cables can operate and be maintained. It would not be appropriate to fully reinstate such land to a condition suitable for its former use, which at that juncture would contain (or be within 10 metres of) the new cables. This is why Requirement 9(2) contains this exception. Requirement 9(3) also draws on the exceptions in Article 27 which address other appropriate exceptions to reinstatement. The Applicant notes <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [CR1-044]</b> at GG07 confirms that ‘Hedgerows, fences and walls ... will be reinstated to a similar style and quality to those that were removed where possible, with landowner consultation’.</p>
7.1.4	Aftercare for reinstatement and mitigation planting	The role of mitigation planting in moderating the magnitude of effects over time is an important factor in the assessment as is a realistic understanding of growth rates for new planting in the East of Suffolk. It needs to be understood that erratic and unpredictable rain fall patterns can be a very limiting factor in successfully establishing new tree and shrub planting in this region. Anticipated growth rates within the Landscape and Visual Impact Assessment (LVIA) are an important consideration, informing photomontages/wireframes depicting mitigation planting at Year 1, Year 5, and Year 15 post planting.	<p>The growth rates used within the Year 15 visualisations were developed using information that East Suffolk Council provided for a local tree planting scheme as a reference for local tree growth rates and has been agreed by all stakeholders during the landscape thematic meetings (see <b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]</b>).</p> <p>The commitment to adaptive management is secured in 7.3 of <b>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]</b>, which notes the flexibility to adapt to future climate changes and trends with regard to species selection and maintenance requirements.</p>
7.2 Ecology and Biodiversity			



Reference	Matter	Point Raised	Applicant's Comments
7.2.1.1-7.2.1.2	Ornithology	<p>The Environmental Statement (e.g. Chapter 2 Appendix 2.2.B Suffolk Wintering Bird Survey Report, paragraph 1.5.36 <a href="#">[PDA-025]</a>), recognises that bird surveys have not obtained complete coverage of all of the land within the Order Limits for enough of the survey period.</p> <p>Some species are therefore likely to have been under recorded, which in turn may have led to their importance being categorised at a lower level than should be the case. This is of concern for some species in some locations within the Order Limits, as some of the bird species recorded breeding within the Order Limits, including woodlark, are species of importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act) (2006)) and/or are listed on Schedule 1 of the Wildlife and Countryside Act (1981) (as amended). Paragraphs 5.4.54 and 5.4.55 of <i>NPS EN-1</i> and East Suffolk Council Suffolk Coastal Local Plan policy SCLP10.1 require that such species are protected from the adverse effects of development. It is also acknowledged that the applicant has assessed all bird receptors as being of at least 'Regional' importance, with breeding and wintering species east of Leiston Road being assessed as of 'National' importance and breeding SPA species (woodlark and nightjar) east of Leiston Road being assessed as of 'International' importance. Therefore, the only areas/receptors where a greater significance could potentially be attributed would be breeding and wintering birds west of Leiston Road.</p>	<p>The purpose of the wintering and breeding bird surveys was not to census every field, but to generally characterise the bird populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. Two years of breeding bird survey was undertaken (whereas for many projects only one year is undertaken) while in some areas three seasons of wintering bird survey was undertaken. The geographical and temporal scope of the surveys provided a good understanding of bird assemblages.</p> <p>The Proposed Project ornithologists ensured their transects coincided with the key areas where the Proposed Project activity would be undertaken and/or where habitat of particular interest to breeding or wintering birds would be present. This included paying attention to crop rotations, such that fields that were arable in some years but fallow in others were surveyed and the opportunistic use of those fields by woodlark was noted, along with the change in nesting locations by other Schedule 1 birds such as hobby. Many of the affected fields in particular parts of the survey area have similar features, and the bird assemblage is unlikely to differ radically at an individual field scale.</p> <p>The Applicant is confident that it has good survey coverage of the Order Limits and a good knowledge of the ornithological interest of the area. It is therefore considered highly unlikely that the value assigned to ornithology in <b>Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]</b> (varying between regional and national importance depending on location) would be raised further if additional survey was undertaken and there is no reason to consider that impacts have been missed or downgraded.</p>
7.2.1.3	Ornithology	<p>Based on these assumptions, ESC hopes that the ExA will examine this issue carefully in light of the worrying limitations in survey coverage, particularly if species specific mitigations are proposed. For example, general mitigation to avoid impacts on breeding birds includes clearance of suitable areas of habitat outside of nesting periods considered to be March to August inclusive (Construction Environmental Management Plan Register of Environmental Actions and Commitments (CEMP REAC) [APP-342] Action B02). However, species such as woodlark will start nesting earlier in the year than other species and therefore may begin to utilise areas that have been cleared in late winter before construction activities begin in the spring. Whilst Action B24 in the CEMP REAC [APP-342] seeks to address this, it only applies to works in arable fields or acid grassland areas, not areas of potentially suitable nesting habitat that might be created by other clearance/construction activities. Such impacts, and the need to mitigate for them, must be adequately considered and addressed in the appropriate management plans, including the potential for overlapping measures to conflict such as CEMP REAC Actions B02 (clearance of vegetation outside of bird nesting season) and B05 (clearance of vegetation during reptile active season). As set out in 7.2.1.5 below, the implementation of mitigation measures must be informed by pre-construction surveys and should be deployed in all necessary areas, rather than being potentially limited in scope by constraints on location imposed by CEMP REAC Action B24. The CEMP REAC should be amended to address this so that it is ensured that the necessary mitigation measures are appropriately captured in the plans which will be proposed under DCO Requirement 6.</p>	<p>See the above response.</p>
7.2.1.4	Ornithology	<p>The overall assessments of the importance of bird receptors throughout the Order Limits are sufficiently high to address the significances assigned to the different</p>	<p>The Applicant notes East Suffolk Council's acknowledgement that '<i>The overall assessments of the importance of bird receptors throughout the Order Limits are</i></p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>receptors. However, it is important that the species-specific mitigation measures (for birds and other protected species) secured as part of the project interact with each other appropriately, so that the implementation of one measure does not create the need for either an additional future measure to be implemented or an additional constraint on the delivery of the project. For example, winter clearance of vegetation</p> <p>for nesting birds creating new habitat for ground nesting species like woodlark which may set up territories before construction works then commence the following spring.</p>	<p><i>sufficiently high to address the significances assigned to the different receptors.'</i> This fits with the Applicant's view that for the purposes of establishing a baseline for ecological impact assessment to inform the DCO Application the ornithological survey data are sufficient.</p> <p>The Applicant agrees that pre-construction monitoring (and bird surveys every year) will be needed to ensure steps can be taken to keep areas within the Order Limits clear of nesting Schedule 1 Birds. Section 7.1 of <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> identifies the need for such surveys including specific reference to birds.</p> <p>The Applicant is aware that different species have different clearance seasons. It will be for the Ecological Clerk of Works for the project to provide specific advice to the contractor as to the suitable period for clearance. To avoid conflict between reptiles and nesting birds this will generally be in September/October.</p>
7.2.1.5	Ornithology	<p>As currently presented, the OCEMP [AS-127] and OLEMP [AS-059] do not include firm commitments to pre-construction surveys, which will be required to inform the detail of the necessary construction mitigation measures. Whilst paragraph 7.1.1 of the OLEMP makes reference to pre-construction surveys, no detailed mechanism is included for the scope of these to be agreed with the Local Planning Authority, nor is there a commitment for the results of such surveys and how they have informed detailed mitigation measures to be reported to and agreed by the Local Planning Authority prior to relevant phases of the development commencing. This would help address the concerns set out above and should therefore be secured as a commitment in the OCEMP and OLEMP to be discharged under the relevant DCO requirement (Requirement 6).</p>	<p>See above response. The Applicant can confirm they would expect the results of monitoring surveys and update surveys, including intended responses, to be shared with the Local Planning Authorities as part of the delivery of the LEMP. Paragraph 1.2.4 of <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> states that '<i>This oLEMP is a live document that will continue to be updated and refined based on ongoing discussions between the Applicant, statutory bodies and relevant stakeholders</i>'.</p>
7.2.1.3-7.2.1.4	Hazel Dormouse	<p>Part 2 Chapter 2 (Ecology and Biodiversity) of the Environmental Statement [<a href="#">PDA-017</a>] reports that surveys recorded a potential hazel dormouse nest (comprising one green leaf nest with a partially woven structure) within the Order Limits during the October 2024 survey visit, indicating the possible presence of hazel dormouse within Zone D. This is potentially a significant record as hazel dormouse has not previously been recorded in this part of East Suffolk. The Hazel Dormouse Survey Report [<a href="#">APP-108</a>] recommended that further surveys were undertaken within Zone D prior to vegetation clearance being conducted. However, the ES chapter [<a href="#">PDA-017</a>] contradicts this and notes that a precautionary approach for removal of vegetation suitable for hazel dormouse would be followed. The ES identifies that hazel dormouse is considered to be of negligible importance within the Suffolk Order Limits as none have been identified to be present. The ES concludes that habitat loss impacts for this species are considered to be a negligible impact leading to a negligible effect that is not significant.</p> <p>As well as a failure to undertake further survey for this species which should have been triggered by the find of a potential nest, the survey work undertaken to date in the area where the nest was found does not meet the level effort set out in the best practice guidance which was in place at the time the surveys were undertaken.</p>	<p>The Applicant does not see (or intend) a contradiction between stating that update surveys would be required prior to vegetation clearance and the use of a precautionary method of working. The Applicant's intention is that update surveys for dormice in Zone D prior to construction would be undertaken. A commitment to update surveys is made in paragraph 7.1.1 of <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b>. While this paragraph does not explicitly mention dormice, the use of the phrase 'will include' prior to the list of surveys indicates that list was not intended to be comprehensive. The Applicant is content to add dormice to the list for reassurance.</p> <p>While the approach to dormouse habitat clearance (specifically any need for a license) <u>may</u> need reviewing following the completion of any update pre-construction survey, the risk of this is considered low given (as acknowledged by East Suffolk Council and Suffolk County Council) dormice have not previously been recorded in this part of East Suffolk despite a great deal of survey work for numerous infrastructure projects and only one dormouse tube out of almost 600 tubes (extensive survey effort) had an ambiguous record. It is therefore expected that a precautionary method of working would continue to be appropriate.</p> <p>For the most part the Applicant's dormouse survey exceeded the minimum survey effort in guidance as it existed at the time the survey was undertaken. The scores only come down for D3 because the landowner or occupier unfortunately flailed some tubes which reduced the count. Even if the Applicant accepted East Suffolk</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Council's position that the score for this Zone should actually be below 20, it would only be slightly below by East Suffolk Council's own calculation and given the absence of reliable survey records for dormice in this part of East Suffolk it is unlikely that the relatively small additional survey effort required to bring the score to above 20 points would have clarified the position over the ambiguous nest.</p> <p>The 'possible dormouse' record denotes that the nest was not characteristic, and it was not possible to resolve it to a particular species. Further survey would not necessarily aid this characterisation (since it could well remain unresolvable to species).</p> <p>As a precaution, paragraphs 2.9.87 and 2.9.88 in <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity[APP-049]</b> assumes that dormice could be present (despite the fact the survey did not confirm presence) and a precautionary method of working has been set in measure B14 of <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]</b>. This is a standard way of dealing with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition). Given there is a low expectation of encountering dormice this is considered appropriately precautionary.</p> <p>In the long-term there will be a substantial net increase in the amount of habitat available for dormice.</p>
7.2.2.6	Hazel Dormouse	<p>Given the findings presented to date and the current deficiency in survey effort, ESC considers that it is essential that further surveys are undertaken in order to try to establish confirmed presence and inform the need for species specific mitigation and if necessary, mitigation licensing. These surveys must follow the latest best practice survey methodologies as published in the Dormouse Conservation and Mitigation Handbooks (both March 2025). This should include the use of footprint tunnels which East Suffolk Council previously advised the applicant to utilise, but which have not formed part of the survey methodology to date (as they were not a survey technique required in the previous version of the handbooks). In the absence of this further survey work, it is unclear how the impact and mitigation conclusions presented in the ES can be considered to be accurate enough to be relied upon for the assessment of the DCO, if loss of habitat suitable for dormouse is part of the project in this area. To inform the deployment of appropriate mitigation measures, sufficient further surveys must have been completed prior to construction commencing. This must be committed to in the OLEMP, at present section 7.1 of the OLEMP <a href="#">[AS-059]</a> makes no reference to any further survey work or monitoring for dormice.</p>	<p>See above response. The Applicant is content to agree that the pre-construction update survey would be in line with the most recently published guidance.</p>
7.2.2.7	Hazel Dormouse	<p>It is noted that paragraph 3.4.2 of section 3.4 (Protected Species Licences) in the most recent Outline Landscape and Ecology Management Plan (OLEMP) <a href="#">[AS-059]</a> states that a precautionary method statement for hazel dormice will be followed which will involve supervised clearance of habitat potentially suitable for this species. ESC does not consider that this methodology alone, in the absence of further survey effort, is adequate to address potential ecological or legal impacts on the species. Whilst supervised clearance may avoid killing or injury of individual animals, it will not address impacts arising from habitat loss or habitat</p>	<p>See above response. Regarding the two specific impacts identified:</p> <p>Habitat loss - the Proposed Development will ultimately result in a considerable net increase in suitable habitat for dormice due to woodland, hedgerow and scrub planting at the Converter Station and substation.</p> <p>Habitat fragmentation – in the (currently hypothetical) instance that hazel dormouse was confirmed in pre-construction survey the applicant considers that</p>



Reference	Matter	Point Raised	Applicant's Comments
		fragmentation both in the short and long term. Failure to do so is contrary to paragraph 5.4.35 of EN-1. The potential requirement a Natural England mitigation licence is also relevant to the Secretary of State's decision making in accordance with paragraph 5.4.45 of EN-1. The OLEMP should be updated to include mitigation measures that can be deployed in the construction phase to address impacts arising from short to medium term habitat fragmentation, if the further surveys (as described in 7.2.2.6 above) identify the presence of hazel dormice within the DCO Order Limits. Measures to retain connectivity must ensure that there is no break in linear vegetation to avoid dormice having to cross gaps along the ground. Mitigation measures proposed to retain bat connectivity would not achieve this as permanent gaps would remain for the haul road during the construction phase. An alternative crossing structure, such as an Animex bridge ( <a href="https://ptes.org/campaigns/dormice/hazel-dormouse-conservation/dormouse-bridges/">https://ptes.org/campaigns/dormice/hazel-dormouse-conservation/dormouse-bridges/</a> ) may be appropriate to maintain the necessary connectivity between retained areas of dormouse habitat.	some of the methods to close gaps in hedgerows proposed in <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> for bats would be effective for dormice (such as the instant hedges). However, the Applicant is content to include reference to the Animex bridge into <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> .
7.2.3.1	Red Deer	The ES notes that there has been local feedback that large herds of red deer congregate in the field where the trenchless launch pit is proposed to be located. Red deer have been accorded 'Local' importance. As red deer have large ranges, and the field is considered to be a small part of a much wider area which is used by the deer and so therefore there will be considerable remaining habitat available to them, the ES concludes that the project will result in a negligible impact on a receptor of Local importance, resulting in a negligible effect that is not significant. Whilst ESC does not disagree with the ES conclusion on this species, it should be ensured that the presence of red deer is considered as part of the design of any site fencing, including ensuring that fencing does not direct deer towards roads or other hazards or trap them within confined areas, and adequately protects new landscape planting from deer browsing. This could be achieved through the approval of detailed fencing plans as part of the LEMP, with the commitment for this being included in the OCEMP.	Noted. Paragraph 6.4.2 of <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> , does refer to use of deer fencing to protect planting.
7.2.4.1	Hedgehog	The ES states that hedgehog, a species of importance for conservation (under Section 41 of the Natural Environment and Rural Communities (NERC) Act) (2006)), are difficult to survey for and there is no agreed standard survey methodology. The ES goes on to say that given the prevalence of hedgehog in the east of England and the extent of the Suffolk Onshore Scheme the hedgehog population is of 'District' importance. The ES concludes that subject to the implementation of the identified mitigation, the development will result in a negligible impact on a receptor of 'District' importance resulting in a negligible effect that is not significant. Whilst ESC does not disagree with this conclusion, to ensure that it is accurate, measures to protect hedgehogs during construction vegetation clearance must be included in the OCEMP REAC <a href="#">[APP-342]</a> and OLEMP <a href="#">[AS-059]</a> , with final details discharged as part of the LEMP. These measures should include avoiding clearing areas of habitat suitable for hedgehog hibernation during the hibernation period and outside of the hibernation period inspection of all suitable habitat by an Ecological Clerk of Works prior to any mechanical clearance. This is important as, unlike many other species, hedgehogs will not normally disperse when disturbed and instead will curl into a ball making them vulnerable to killing or injury during vegetation clearance.	This will be considered by the Applicant.
7.2.4.2	Hedgehog	There will be temporary hedgerow loss during the Suffolk Onshore Scheme however, these gaps are proposed to be restored. In the long term the ES concludes that permanent habitat gains will arise from woodland and hedgerow	Noted as above.

Reference	Matter	Point Raised	Applicant's Comments
		planting around the Saxmundham Converter Station and Friston Substation and along the permanent access roads. This is therefore assessed as a negligible impact on a receptor of 'District' importance resulting in a negligible effect that is not significant. Notwithstanding this conclusion, ESC considers that it is important that the Construction Environment Management Plan (CEMP) includes mitigation measures for hedgehog when potentially suitable areas of habitat are being cleared for construction.	
7.2.5.3	Bats - activity surveys	<p>As part of the bat activity surveys, nine static bat detectors (along with walked transects) were used, with one static detector deployed per transect route. Each point was surveyed eight times, with all nine detectors experiencing failures at some point during their deployments. In total, less than the best practice minimum survey effort of five nights per survey was encountered on 23 of the 72 surveys (9 detectors for 8 survey periods), which is an approximately 32% failure rate (from [APP-107] Table 1.4). The applicant acknowledges these failures but concludes that an average of 5 nights per survey period was achieved across the whole survey season by all detectors except those at survey points 2, 7 and 9 ([APP-107], paragraph 1.3.24). Based on the data in Table 1.4, ESC agrees that survey effort at points 7 and 9 did not meet best practice minimum, survey point 2 does appear to have met it but survey point 5 does not. In ESC's experience an equipment failure rate of almost a third is higher than would normally be expected but of more concern is that this has resulted in a third of the transects (3 out of 9) being subject to less than sufficient survey effort. It also appears that no effort was made to address equipment failures by redeploying detectors in the same months. Whilst it is acknowledged that this would not have been possible where surveys were undertaken at the end of a month (such as August and September 2023), there is no obvious reason why it couldn't have been done where surveys were initially undertaken at the beginning or in the middle of a month (such as for August and September 2024). Failure of so many detectors to achieve sufficient survey effort at survey points in August and September 2024 (5 of 9 in August and 7 of 9 in September) means that a key part of the bat active season has been missed. In that period young bats born in the summer will have become free-flying and summer maternity roosts will be dispersing, survey effort in these months would therefore be expected to identify routes being used by bats to disperse from maternity roost sites to mating (and later hibernation) roosting areas, along with any areas that form part of important foraging habitat for bats in this period which is a critical part of their lifecycle as they gain weight ahead of hibernation.</p>	<p>Although some localised equipment failures did occur, additional survey effort was deployed to address it by extending the survey period. It should be noted that there were generally no wholesale failures of remote detectors; rather detectors recorded for 3 or 4 nights in some circumstances rather than 5 nights. Across the survey area, the survey exceeded the minimum standard required in guidance at that time. Overall, the bat surveys for the Proposed Project included 339.5 nights of static detector data, which is substantial. Minimum total requirements overall if 5 nights had been achieved on every transect, every month, would be 315 nights, so across the Order Limits as a whole the Applicant has 24.5 nights of extra data upon which conclusions have been based.</p> <p>Redeploying static detectors within the same month was often not possible due to the time taken to undertake the deployment, retrieve and analyse the data, and then provide landowners with two weeks' notice of return visits as required by survey licenses.</p> <p>As explained in paragraph 2.7.48 and 2.7.49 of <b>Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]</b> the Applicant has graded the mosaic of habitats within the survey area as of National or Regional importance for bats (depending on grading method used) and at least nine species were recorded including species often difficult to detect such as barbastelle bat. Therefore, the Applicant does not consider that any further data is necessary to broadly characterise the interest of the Order Limits, and it is very unlikely that a grading above regional/national importance would be appropriate. Note that it was not the purpose of the survey to provide detailed data on bat use for every hedge in order to determine which hedges require mitigation, since all hedgerows were to be treated as being important for commuting and foraging bats. This was not a decision made to make up for the equipment failures but was an embedded part of project mitigation design.</p> <p>As per paragraph 8.2.3 of the 2023 Bat Survey Guidelines '<i>Activity surveys should provide a representative sample of the bat activity in all habitats present at the proposed development site</i>'. The Applicant considers that this representative sample has been gained from the survey undertaken.</p> <p>Moreover, given the nature of the Proposed Project impacts (temporary hedgerow gaps) and the fact all hedgerows are being treated as important for bats (irrespective of bat records on that hedgerow) the Applicant does not consider any further mitigation would be identified or needed.</p>
7.2.5.4	Bats - activity surveys	Survey effort below the best practice minimum may have resulted in the under recording of both the number of bat species present and, more importantly, the amount of bat activity of each species in the affected survey locations. This in turn	See above response. The mitigation methods to be deployed to enable bats to continue to use hedges (as set out in <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> ) were agreed

Reference	Matter	Point Raised	Applicant's Comments
		may result in insufficient avoidance or mitigation measures (e.g. the use of trenchless techniques to avoid removal of important hedgerows) being implemented in some locations, thus resulting in project impacts which are greater than those set out in the ES.	<p>with the Suffolk Councils prior to DCO submission, and some were suggested by the Councils. There is no nationally agreed standard regarding how many bat passes make a hedgerow 'important' for commuting so any attempt to argue that some hedges are not important could be debated. The Applicant therefore determined that connectivity should be preserved for all hedgerows.</p> <p>Whether hedgerows could be subject to trenchless methods was considered during design of the Suffolk Onshore Scheme, but it was decided that the longer construction timescale required to drill beneath a hedge, and greater land take required for the drive and reception pits, would be more potentially disruptive to ecology than trenched crossing. This is discussed in paragraph 2.9.56 of the <b>Application Document 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]</b>.</p>
7.2.5.5	Bats - Hedgerow removal	It is understood that the applicant intends to mitigate all hedgerow crossings as though they are important hedgerows for bats, irrespective of field survey results, and therefore they consider that survey results for individual areas are less relevant. Measures for this are described in the OCEMP REAC action B07 <a href="#">[APP-342]</a> and OLEMP paragraphs 3.3.6 to 3.3.10 <a href="#">[AS-059]</a> , involving temporarily 'bridging' construction gaps with dead hedging, hazel hurdles, Heras fencing or similar. No consideration appears to have been given to avoiding important hedgerow removal through the use of trenchless construction techniques to avoid the need for hedgerow loss. Nor is evidence provided that the identified mitigation measures are technically achievable at all potential hedgerow crossing points. The OCEMP REAC and OLEMP must be updated to provide adequate justification for the mitigation measures proposed and demonstration that they are technically achievable.	See above response. Regarding technical feasibility of the measures proposed, these were all discussed with the project engineers through their review of <b>Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]</b> prior to DCO submission and were deemed technically achievable across the route. They have been deployed on other projects.
7.2.5.6	Bats - activity surveys	It is also understood that the applicant considers that, despite the equipment failure, sufficient survey effort has been achieved across the project area to adequately inform the ES conclusions. Whilst the intention to mitigate all hedgerow crossings as though the hedgerow is important for bats is welcomed, ESC's experience from other NSIPs suggests that this commitment may not always be achievable in practice once detailed construction design work has been undertaken post-consent. Without sufficient survey information it is impossible for the LPA to know which hedgerows are actually important for bats and therefore be able to determine whether any future variations in mitigation for specific crossing points may be appropriate. It is important that the LPA has this information as variations will likely be dealt with via discharge of Requirements which will be an LPA matter to determine.	The Applicant understands that the contractor arguing post-DCO submission that bat crossing measures cannot be deployed, or do not need to be deployed, in specific locations is East Suffolk Council's primary concern. The Applicant's view is that since the survey data was never intended to provide detailed information on every hedgerow (but rather to sample survey the scheme area), and the project engineers have reviewed the proposals, this is not a high risk.
7.2.5.7	Bats - activity surveys	As a subsidiary point, ESC also disagree that sufficient survey effort for the whole project area is an adequate proxy for sufficient survey effort at different locations along the cable route. Whilst it may give an indication of the overall bat assemblage in the area, as set out above it does not allow for a detailed understanding of potential impacts at different points along the route and thus risks compromising the delivery of effective avoidance and mitigation measures as part of the project.	See response to 7.2.5.3 above.
7.2.5.8	Bats - Hedgerow removal	The approach to mitigating impacts on hedgerows used by foraging/commuting bats proposed by the applicant attempts to mask the identified deficiencies in bat survey work. Whilst in principle the proposal to mitigate all hedgerow crossings as	See response to 7.2.5.4 above.



Reference	Matter	Point Raised	Applicant's Comments
		though the hedgerow is important for bats is welcomed, ESC have significant concerns that it is achievable in practice. It also misses the consideration of whether impacts on hedgerows important for bats could be avoided through the use of trenchless construction techniques.	
7.2.5.9	Bats - activity surveys	Further bat activity surveys are required in locations where equipment failures have resulted in survey effort less than that set out in the published best practice guidance (that is, survey points 5, 7 and 9). Dependent on the time which elapses before these are undertaken, they will potentially need to form part of a complete bat activity survey update at all transect locations prior to construction commencing. Whilst section 7.1 of the OLEMP <a href="#">[AS-059]</a> makes reference to updated baseline surveys for bats (amongst other species), it is not explicit in what types of surveys these will involve or what locations will be covered. This should be clarified so that it is clear what pre-construction surveys will be undertaken, how they will be reported to the Local Planning Authority and how their results will be used to inform final details of mitigation measures.	See response to 7.2.5.3 above
7.2.6.1	Reptiles	Whilst the overall conclusion is not disagreed with, ESC considers that due to the size of the area of habitat impacted by these works, trapping and translocation mitigation combined with displacement may be required in place of displacement only. The detail of the necessary mitigation should be secured as part of the OLEMP <a href="#">[AS-059]</a> for discharge as part of a LEMP.	The Applicant considers that the precise method for reptile exclusion could be a matter for agreement in the detailed LEMP secured under requirement 6 of the draft DCO.
7.2.7.4- 7.2.7.5	BNG	<p>ESC considers that for true Biodiversity Net Gain to be delivered as part of the project, it is essential that the offsite delivery portion is secured as part of the consent, either as part of the DCO/Deed of Obligation or a standalone Section 106 agreement with the LPA. This should include securing delivery of the initial habitat creation/enhancement measures, a minimum of 30 years of management of these habitats (although management for the operational life of the development would be preferred), and long-term monitoring of the habitats. Without this information and security, the LPA cannot be confident that the necessary gains will be delivered, nor will ESC know what its role will be in securing, monitoring and enforcing delivery of these gains.</p> <p>Details of how the necessary offsite gains will be secured, delivered, managed and monitored, including whether the LPA needs to enter into any legal agreement with the applicant for this purpose, are therefore required before the close of this examination.</p>	The Applicant is committed to the delivery of BNG through its corporate commitments as outlined in section 1.6 of <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> .
7.2.8.1	Habitats Regulations Assessment (HRA)	<p>The HRA report [AS-007] has screened in a number of impacts for Appropriate Assessment. Whilst ESC primarily defers comment on the Appropriate Assessment process to Natural England, ESC highlights the following point in relation to the assessment of impacts on birds for which the Minsmere-Walberswick Special Protection Area (SPA) is designated:</p> <ul style="list-style-type: none"> <li>Construction/decommissioning phase noise and visual disturbance of nesting woodlark and nightjar at Sandlings SPA, and wintering birds using functionally linked land for Alde-Ore Estuary SPA/Ramsar. The HRA notes from meetings with Natural England that a 60 dB LAmax threshold has been agreed as being a reasonable precautionary threshold for which to assess significant disturbance against. The HRA notes that no mitigation is needed to achieve this, beyond standard noise mitigation methods such as close board fencing. The noise fence</li> </ul>	<p>The Applicant's view is that this has been fully assessed in <b>Application Document 6.6 (C) Habitats Regulations Assessment Report [REP1-071]</b>.</p> <p>Natural England have not raised any issues on these matters.</p>

Reference	Matter	Point Raised	Applicant's Comments
		will also act as a visual screen and thus protect birds in the SPA from visual disturbance. With regards to non-breeding birds of the wetland parts of the RSPB North Warren reserve, the HRA states that the noise modelling identified that the 60 dB Lamax contour will only overlap with the RSPB reserve east of the former railway (the wetland parts of the reserve) to a very small extent. The affected small area of reserve does not support significant numbers of SPA/Ramsar birds. Therefore, no Adverse Effect on Site Integrity (AEoSI) of Minsmere-Walberswick SPA or Alde-Ore Estuary SPA will arise due to noise disturbance impacts of the Proposed Project on functionally linked habitat in RSPB North Warren Reserve. ESC defers detailed comments on this matter to Natural England and the RSPB. Whilst ESC considers the breeding and wintering bird assemblages east of Leiston Road to be of 'National' importance and those associated with the Sandlings SPA to be of 'International' importance, ESC understands that the North Warren site also supports species (such as breeding Marsh Harrier) which are functionally linked to the Minsmere Walberswick SPA population. It must therefore be ensured that impacts on such species, and the designated sites which they are associated with, are fully assessed and addressed.	
7.2.9.1	General approach to avoidance and mitigation measures	Whilst it is acknowledged that the project seeks to embed a number of ecological avoidance and mitigation measures, it is concerning that some of these measures to narrow construction gaps in hedgerows are caveated with the phrase 'where practicable', such as measure B07 in the CEMP (Appendix A - Outline Code of Construction Practice) <a href="#">[APP-341]</a> . It is unclear how this will be determined or what will happen if it is decided that a particular measure is not practicable. These measures are related to avoiding or mitigating impacts on features of high biodiversity importance, and if such measures are deemed not to be practicable then adverse impacts are likely to occur which would go beyond those assessed in the ES.	The Applicant will give further consideration to the wording of such measures; however it is usual to include a reference to the practicability of achieving a measure to cover for situations where there is a previously unknown constraint that means the measure cannot be fully complied with in a specific location.
7.2.9.2	General approach to avoidance and mitigation measures	Also, as raised in pre-application consultation, it is unclear why some construction mitigation measures are being included in the OLEMP <a href="#">[AS-059]</a> rather than the OCEMP and its appendices ( <a href="#">[AS-127]</a> , <a href="#">[APP-341]</a> and <a href="#">[APP-342]</a> ). It is ESC's opinion that all construction mitigation measures should be included within the Construction Environmental Management Plan (CEMP), and all post-construction habitat management and monitoring measures should be included in the Landscape and Ecological Management Plan (LEMP), rather than construction mitigation measures being split across the both the CEMP and LEMP. This will reduce the chance of future confusion when the project moves into the delivery phase and avoid the chance of necessary measures being overlooked as they won't be split between several documents.	The Applicant will give further consideration to whether any measures would benefit from being moved from one document to another.
<b>7.3 Design and Heritage</b>			
7.3.2.4	Archaeology – Neolithic Henge, Friston	ESC was previously unaware of a number of archaeological discoveries and whilst it defers to the SCC Archaeological Service (SCCAS) and Historic England on the management and handling of such archaeological matters, ESC shares SCC's significant concerns. ESC understands that the Neolithic henge is located directly on top of the Applicant's proposed cable corridor and ask that the appropriate level of assessment and mitigation is accorded to this newly identified and significant project constraint.	<p>Noted. Comments regarding archaeology have been received from Historic England and the Suffolk County Archaeological Service with responses provided.</p> <p>Regarding the 'Neolithic henge', additional geophysical survey was undertaken in September and October 2025 of the area associated with proposed Change 3 (Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk) and the results have been shared with Suffolk County</p>

Reference	Matter	Point Raised	Applicant's Comments
			<p>Council and Historic England and submitted as part of <b>Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]</b>. This was focused on the area where a possible prehistoric henge had been identified during the Phase 2b evaluation trenching.</p> <p>The additional geophysical survey confirmed that the feature is a G-shaped enclosure and not a henge (see <b>Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]</b>) and as such it is not considered to be of schedulable quality (see paragraph 7.54 of <b>Application Document 9.35 Local Impact Report (LIR) from Suffolk County Council [REP1-130]</b>. Consultation with SCC and HE has assigned a Late Bronze Age date based on other features that were excavated as part of the Phase 2b evaluation trenching.</p> <p>Further evaluation trenching is currently being undertaken (November/December 2025).</p> <p>Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk, as well as the further evaluation trenching in Friston, will be submitted in due course during Examination</p>
7.3.2.5	Archaeology – Neolithic Henge, Friston	ESC understands that the Applicant is proposing to submit a change request, and ESC has reviewed the proposed changes as summarised in the consultation letter [CR1-004] and detailed in the Change Application Consultation Document [CR1-003]. ESC understands that under Change 3, the Applicant is proposing to adjust the Order Limits in the vicinity of the henge, specifically to exclude the henge, and extend the Order Limits to enable the cable route to be routed either side of the feature. Whilst ESC supports this proposal, it defers to SCCAS on these matters.	<p>As noted in the response to comment 7.3.2.4, additional geophysical survey undertaken in September and October 2025 of the area associated with proposed Change 3 (Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk) has confirmed the possible Neolithic henge is a ‘G-shaped enclosure’. These results have been shared with Suffolk County Council and Historic England and submitted as part of the Change Request application in <b>Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]</b>.</p> <p>Consultation with Suffolk County Council and Historic England has confirmed that it is not considered to be of schedulable quality.</p> <p>Further evaluation trenching is currently being undertaken (November/December 2025).</p> <p>Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk, as well as the further evaluation trenching in Friston, will be submitted in due course during Examination.</p>
7.3.2.7	Archaeology – Neolithic Henge, Friston	Although supporting the principle of the change, ESC does query whether the proposed 30m buffer zone from the Henge to the underground cable and temporary haul route will be sufficient to ensure that no harm will be caused to this heritage asset given that further survey works in the area is still being undertaken. ESC asks that the results of the survey work are reported during the course of examination – and in any case must be reported prior to the end of the examination period - to demonstrate that the proposed 30m buffer zone is indeed sufficient to avoid potential new and unassessed environmental effects. This is particularly important given that the area surrounding the Henge has yet to be investigated and the <i>‘area requiring Preservation in Situ has the potential to be</i>	<p>Consultation with Suffolk County Council and Historic England has confirmed that the asset does not meet the threshold to be considered schedulable quality and as such avoidance is not required. However, SCC have confirmed that if impacts on the asset could not be avoided, partial excavation of the feature would not be appropriate and the full feature would need to be excavated (see paragraphs 7.54-7.56 of <b>Application Document 9.35 Local Impact Report (LIR) from Suffolk County Council [REP1-130]</b>).</p> <p>The final change request reflected the most recent survey information and consultation and is reported in <b>Application Document 9.76.2 (A) Change</b></p>



Reference	Matter	Point Raised	Applicant's Comments
		<i>increased</i> ’ as SCC stated in its representations to PINS dated 18 August 2025 [AS-074]. ESC expects the findings of the ongoing trial trenching (and other GI works) related to the Neolithic Henge to be complete and available for scrutiny in good time within the examination period so to enable the appropriate provisions and or protections to be secured in the DCO by Requirement, in consultation with the relevant stakeholders and planning authorities.	<b>Request Report [CR1-052] and Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</b> This document explains that flexibility has been incorporated into the Order limits to enable both the full excavation or the feature and avoidance of the feature by routing to the east, with the final approach to be informed by trial trenching completed on the site to determine the best approach from an environmental perspective.
7.3.3.1	Heritage Planning Policy	The development is in conflict with Policy SCLP11.4, as it is of a “scale, form height, massing and position” that is incongruent with the setting of Hurts Hall and Hill Farmhouse, thereby causing harm to their significance, which cannot be fully mitigated by new landscape planting. This identified harm is important and should be taken into account in the overall balance.	This issue is given consideration in the planning balance as discussed in section 7 of <b>Application Document 7.1 (C) Planning Statement [AS-057]</b> .
<b>7.4 Environmental Protection</b>			
7.4.1.2 – 7.4.1.5	ESC’s Overarching Position	<p>There has been limited engagement from the Applicant prior to submission but the application as now submitted introduces a large amount of information that has not previously been seen. This conflicts with the fundamental ethos of the NSIP consenting process. During this engagement, the Applicant has relied heavily on the “need” argument for this project and whilst this is accepted as an important factor, it cannot override the need to avoid, prevent, reduce, mitigate and minimise impacts to residents and the environment. ESC wishes to establish a number of <b>Overarching Principles</b> in order to ensure that these impacts are considered and fully addressed.</p> <p><b>First</b> - ESC considers that significant emphasis must be placed on SPR’s East Anglia ONE North and TWO projects as precedents for the Sea Link application. It is ESC’s opinion that they represent the most comparable projects in terms of construction and operation and in terms of representative locations, impacts and issues. These projects have been recently consented after rigorous examination and provide a good model by which to assess Sea Link against.</p> <p><b>Second</b> - ESC considers that a genuine emphasis should be given to likely real-world impacts and their practical reduction. The Applicant has produced a large amount of information in respect to calculated magnitude and significance values. Whilst valuable indicators, they can serve to obscure impacts and how they are felt in a real-world situation. The applicant should concentrate on adopting achievable and practical limits, controls and mitigation with a commitment to Best Practicable Means (BPM) to provide the lowest possible reasonable impacts underlining the principle of providing reassurance to residents in an easy-to-understand way. 1) 1) Any noise limits proposed should be seen as just that, limits to be avoided rather than targets to be achieved and all endeavours to keep noise and vibration to a reasonable minimum are expected to be in line with the principles of BPM.</p> <p><b>Finally</b> - the Applicant has identified that a number of significant impacts are likely without mitigation but with the application of non-specific ‘mitigation’ all of these significant impacts are resolved. ESC will need to see robust evidence for this in all cases, together with the specific details of precisely what mitigation will be available, considered and used, and when delivered, to ensure that not only are significant adverse impacts avoided as required by policy, but that adverse impacts are mitigated and minimised as far as reasonably possible, or preferably avoided entirely. Due to the large number of Nationally Significant Infrastructure Projects in this area, which in context is relatively quiet, rural and residential in nature, expectations are high in terms of these projects being exemplars in local environmental protection regardless of national importance and “need”. All</p>	<ol style="list-style-type: none"><li>1) The Applicant is committed to continuing to seek and secure ways in which impacts can be further addressed, which will include further review of the commitments made by other project including East Anglia ONE North and TWO, to consider their applicability and viability for the Proposed Project.</li><li>2) The Proposed Project has already committed to deploying BPM with regards to potential noise impacts – see measure NV01 in <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]</b>.</li><li>3) In situations where non-specific mitigation is used this is typically where a suite of measures is available to select from, and the measures are tried and tested. This has not been applied to any novel or untested measures. The need for detailed/final versions of the wide range of management plans set out in Requirement 6 to be agreed with ESC provides the mechanism for details of these measures to be agreed.</li></ol>

Reference	Matter	Point Raised	Applicant's Comments
		proposed works associated with these projects should be planned and the infrastructure designed with the lowest reasonable impact in mind.	
7.4.2.2	Working Hours	Throughout the pre-application consultation stages with the Applicant, 0700-1900 Monday to Friday and 0700-1300 Saturday with no activity Sunday or Bank Holidays were the suggested working hours during construction. This aligns with other projects in the district as discussed below and provides residents with a period of respite from construction activity. However, this was changed prior to submission to include Saturday afternoon, Sundays and Bank Holidays (0700-1900). As a result of engagement with ESC, the Applicant has reduced the hours by a small amount in the application (0700-1700 on Sundays and Bank Holidays), however they still propose 7 days a week working which ESC oppose. These amended hours of working are not accepted by ESC.	<p>The Applicant notes the concerns set out by ESC regarding the construction working hours. The Applicant does not consider that it is necessary to amend the drafting of <b>Application Document 3.1 (E) draft Development Consent Order [REP1-036]</b> for the reasons set out in the <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>.</p> <p>The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted.</p> <p>The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>Since publication of the Preliminary Environmental Information Report (PEIR) within Statutory consultation, the proposed construction working hours have changed. The change of these hours was consulted on as part of the Targeted consultation. The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:</p> <p>Monday – Friday: 0700 to 1900; and</p> <p>Saturday, Sunday and Bank Holidays: 0700 to 1700.</p> <p>Details relating to the proposed construction working hours and any associated restrictions are contained in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order [REP1-036]</b>. The impacts of construction work on Saturday afternoons, Sunday and Bank Holidays have been assessed within the EIA and this is reported within the ES within the technical chapters, where relevant. The traffic and transport assessments within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> and <b>6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</b> specifically include an assessment of the Saturday lunchtime period (12pm to 1pm) based on forecast construction traffic movements during the peak period of construction and does not identify the potential for significant effects as a result of the Proposed Project. Construction work, including that undertaken if and where needed on Saturday afternoons, Sundays and Bank Holidays, would be suitably controlled by (for example)</p>

Reference	Matter	Point Raised	Applicant's Comments
			<b>Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102] and Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341].</b>
7.4.2.4	Working Hours	During discussion with the Applicant, it was noted that a reason for 7-day a week working was to ensure programme flexibility. It is vital to note that all of these projects have mechanisms to request working outside of permitted hours which is something that ESC will always support where the need has been justified. ESC would suggest a similar mechanism be employed in the case of Sea Link. Justification of working in these circumstances is a vital step in determining BPM, in that it should always be a case that intrusive works can only take place at that time and cannot reasonably be undertaken at a less sensitive time.	The Applicant has looked to provide greater certainty over specific elements of the works, with percussive piling works limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant planning authority. In addition, HGV deliveries are limited 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant highway authority, to reflect the lower impact works anticipated for Sundays and Bank Holidays. These constraints are listed under paragraph 7 of the draft DCO within <b>Application Document 3.1(E) draft Development Consent Order [REP1-036]</b> . However, the Applicant notes the concern raised.
7.4.2.5	Working Hours	There will also be a list of exceptions to working hours in the DCO, however currently ESC believes the list for Sea Link is too broad and should be more akin to those examples and precedents set out above. Requirement 23 of the EA1N and EA2 DCOs provides the accepted list of exceptions that has been previously agreed (Schedule 1, Part 3, Requirements)15. Justification for exceptions to working hours should be provided.	Paragraph 7 in <b>Application Document 3.1(E) draft Development Consent Order [REP1-036]</b> lists the operations that the Applicant is looking to highlight as potentially taking place outside the core working hours. It should be noted that Requirement 23 and 24 of the EA1N and EA2 DCOs list similar activities and includes catch all statements ' <i>continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring, dewatering, cable pulling, cable jointing and drilling during the operation of a trenchless technique;</i> ' and ' <i>continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths</i> ', whereas the Applicant has listed out these activities as separate elements.
7.4.2.6	Working Hours	It is expected that the precedent being used by NGET in the argument to support 7-day working is that of Bramford to Twinstead (B to T) on account of it being the most recently consented DCO in East Suffolk. It should be noted, however, that these working hours were not supported by the Local Planning Authorities, who argued for shorter working hours, only to be overruled by the ExA's recommendation. It is also important to note that the B to T and Sea Link projects are very different, with the impacts of Sea Link spread over a larger area, and the works not being comparable in terms of the actual construction with no substation included in the B to T consent and, importantly, in terms of cumulative impacts with consented and future projects. The latter is particularly important due to the likely co-location of substations on one site at Saxmundham and the convergence of multiple projects to connect at Friston.	The Applicant highlights that the presence of consented and potential future projects is a driver for greater flexibility within the working hours to enable coordination and cooperation to occur between the projects to limit impacts and gain efficiencies where practicable during construction.
7.4.2.7	Working Hours	With the number of NSIPs in this area and the likely additional impact of Sea Link, residents require respite. Sea Link alone will create a number of significant adverse and adverse effects, although it is noted that the Applicant considers that with mitigation, significant adverse effects are not predicted. This conclusion is yet to be tested and there is limited information on mitigation for construction work. It is crucial that residents get regular breaks in what is a very noise sensitive area and that the proposed development is well managed and controlled. Reasonable hours of work represent one of the key areas of reducing impact to residents and should be seen as such.	A response to this comment can be found in <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b> .



Reference	Matter	Point Raised	Applicant's Comments
7.4.2.8	Working Hours	The Applicant suggests that longer working hours will result in the project's construction being completed sooner. Given the construction impacts of other projects the extended duration of works at the co-location site at Saxmundham, and the convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant in any case if all are consented. These are not small or isolated developments that once over will see the end to impact, they are but part of a wider package of works and must be considered as such. Given all other comparable projects provide this respite (including projects promoted by SPR), it would seem obtuse to now start including these periods and creating impact at times where ESC and other projects have worked hard to prevent it, particularly given the spatial relationship between SPR's projects and the proposed Sea Link project.	The working hours requested will provide greater flexibility for the Applicant to align works with consented and potential future projects. A shorter construction phase for the Applicant would enable greater opportunity for colocation and cooperation with potential future projects such as LionLink.
7.4.4.2	Noise and Vibration – Sea Link Construction (Methodology)	The Applicant has proposed the SOAEL, which in terms of policy is the Noise limit to be avoided and therefore will effectively be the noise limit for construction activities in line with the categories in Table E.1 of BS5228-1 (the 'ABC' Methodology) and this is accepted as appropriate. However, it is ESC's opinion that the LOAEL has been set too high. The LOAEL is the point where the Applicant is required to "mitigate and minimise" noise and vibration and this should be based on the baseline noise environment of the area. The project should be mitigating and minimising their impacts on any level above that which is currently experienced. The current LOAEL would suggest that there is no/low impact below this level that is not worthy of mitigation, and this is disingenuous.	Noted, and agreed in principle. The construction noise LOAEL was set relatively to guidance values from BS 8233 for suitable internal and external conditions (with open windows for internal levels). However, it is conceded that construction noise may still be audible below this level and may therefore constitute an adverse effect. However, the contractor is required to employ best practicable means (BPM) to reduce construction noise and vibration levels for all works irrespective of this threshold.
7.4.4.3	Noise and Vibration – Sea Link Construction (Methodology)	<p>The Applicant places a lot of emphasis on the use of "Temporal Restrictions" as a means to avoid predicted adverse and significant adverse effects. It is unclear from some of the documents what this means however the applicant makes an attempt to clarify this in its response to the ExA's Section 89(3) Letter of 5 September 2025 <a href="#">[AS-106]</a>:</p> <p><i>"Construction noise - temporal restrictions Potential examples of temporal restrictions that could be applied during weekends for works that may exceed the relevant weekend construction noise level threshold1 at nearby noise sensitive receptors include (but are not limited to):</i></p> <ul style="list-style-type: none"> <li><i>• alternate weekend working (e.g. one weekend on, one weekend off);</i></li> <li><i>• alternate weekend day working (e.g. Saturday or Sunday working, but not both on the same weekend);</i></li> <li><i>• no more than two weekends in any consecutive three weekends; or</i></li> <li><i>• no more than four weekends of working in any consecutive eight weekends.</i></li> </ul> <p><i>The appropriateness of which temporal restrictions may be considered at specific locations would be subject to further review. The necessity for such measures would depend upon implications for construction programme and contractor working practices."</i></p>	Noted.
7.4.4.4 – 7.4.4.7	Noise and Vibration – Sea Link Construction (Methodology)	The BS5228-1 'ABC' methodology sets a clear basis for significance of impact and does not ascribe "temporal restrictions" as a basis for the determination of that significance. This methodology is the agreed methodology for the determination of	The Applicant agrees that ideally noise levels would be kept to below the noise level SOAEL thresholds identified, but disagrees with regards to temporal criteria and restrictions. BS 5228 does give reference to numerous examples of temporal criteria, but it is also noted that the BS 5228 criteria are examples only (as

Reference	Matter	Point Raised	Applicant's Comments
		<p>significance and to introduce such a factor as a basis of significance could falsely dilute impact and obfuscate the need for real mitigation.</p> <p>BS5228-1 (and BS5228-2) provide a comprehensive and tested foundation for the control of noise (and vibration) for construction. They embed the wider principles of Best Practicable Means and their use as the guiding standards has been accepted by all other comparable projects.</p> <p>Whilst there are several standards, guidance documents and indeed some legislation that use temporal thresholds as a way to indicate significance, ESC does not accept temporal restrictions in the form presented as an adequate form of mitigation, especially given the reliance on it to remove predicted significant adverse and adverse effects and consider them in direct conflict with the principles and spirit of the 'ABC' methodology and BS5228-1. Just because noise only happens so many days in so many days does not reduce the impact on the days it is happening, hence reliance on temporal restrictions as primary mitigation in this way is not acceptable.</p> <p>The 'ABC' methodology should be the only assessment of significance for construction noise that is practically used for the project. Notwithstanding the use of other guidance to give wider context at this stage, its use should be supported by the complete adoption of the wider principles of the BS5228-1 standard, by Best Practicable Means and supplemented by S.61 Control of Pollution Act applications where deviation is required to ensure that such deviation is necessary, justified and the smallest it can justifiably reasonably be.</p>	<p>previously indicated by East Suffolk Council). Additionally, the 'ABC' thresholds are for <u>potential</u> significant effects. It states that '<i>the assessor then needs to consider other project-specific factors, such as the number of receptors affected and the duration and character of the impact, to determine if there is a significant effect</i>'. Additional guidance in this matter has been taken from the Design Manual for Roads and Bridges LA 111, which provides temporal thresholds for potential significant effects based on the 'ABC' method values.</p> <p>Temporal restrictions are therefore a 'catch-all' for potential situations where, despite the use of best practicable means, noise levels may not be able to be kept below the noise level threshold, thus avoiding significant adverse effects. Such a situation, were it to occur, would still be considered an adverse effect and therefore the requirement to mitigate and minimise potential effects would apply. Hence, temporal restrictions would then form part of that strategy.</p>
7.4.4.8	Noise and Vibration – Sea Link Construction (Methodology)	<p>Furthermore, the discussion on “temporal restrictions” in <a href="#">[AS-106]</a> does not bring comfort and raises further questions given that not only are there a wide choice of said restrictions suggested as examples but it is also stated that they could be potentially in clear exceedance of the BS5228 table E.1 significance thresholds, something that should only occur by prior consent conferred by S.61 Control of Pollution Act. It goes on to state that mitigation would be dependent on programme and contractor working practices, effectively giving free reign to not provide mitigation for situations in relation to programme or contractor preference, making it a tenuous solution to the problem of preventing adverse and serious adverse effects.</p>	<p>Noted. However, temporal restrictions would be a 'catch-all' for situations where exceedance of the thresholds are unavoidable (noting that exceedance of the threshold itself would not necessary indicate a significant adverse effect).</p> <p>The Applicant agrees, in principle, that situations where the noise level threshold may be exceeded may benefit from a Section 61 application for prior consent. These would be undertaken by the contractor through consultation with East Suffolk Council on case-by-case basis.</p>
7.4.4.9	Noise and Vibration – Sea Link Construction (Methodology)	<p>As stated above, the 'ABC' methodology should be the only assessment of significance used in practical application to provide relevant thresholds for noise control for the project as that is its purpose. Mitigation should be designed and working methodologies planned around the relevant threshold, whilst giving due consideration to project specific factors as required, and supported by the wider principles of the standard. Adherence to the principles of Best Practicable Means is essential to ensure that noise levels are as low as reasonably possible whilst not breaching the relevant limit. This can be supplemented by s.61 Control of Pollution Act applications where deviation is required to ensure that such deviation is necessary, justified and again the smallest it can justifiably reasonably be.</p>	<p>Noted. However, there are no statutory noise limits. The principle is to avoid significant adverse effects, and mitigate and minimise adverse effects. The 'ABC' levels are thresholds for potential significant adverse effects, subject to consideration of temporal effects (amongst other considerations).</p> <p>It is agreed in principle that situations where the noise level threshold may be exceeded may benefit from a Section 61 application for prior consent. These would be undertaken by the contractor through consultation with East Suffolk Council on case-by-case basis.</p>
7.4.4.10	Noise and Vibration – Sea Link Construction (Methodology)	<p>Also for consideration in respect to BS5228, irrespective of ESC's opposition to the proposed working hours currently in the application, it should be noted that there are “weekend” criteria in Table E.1 of BS5228-1 (that is to say, Saturday 1300-1900 and Sunday/Bank Holiday) and that these have lower criteria which should not only be applied but should also be factored in the assessment of impact and any assessment of significance in the Applicant's preference of core working hours.</p>	<p>Yes, agreed. The lower threshold would apply during these periods. This is turn would mean that the threshold is more likely to be exceeded and therefore require temporal strictions for such periods to avoid significant adverse effects.</p> <p>It is noted, however, that BS 5228 does not explicitly state 'bank holidays' in Table E.1, whereas is it explicitly stated in Table E.2 (threshold for potential eligibility of sound insulation). For clarity and the avoidance of doubt, bank-holidays would be considered the same as 'weekend' periods, as a worst-case.</p>

Reference	Matter	Point Raised	Applicant's Comments
7.4.4.11	Noise and Vibration – Sea Link Construction (Methodology)	ESC has concerns with the reliance on the guidance document “Design Manual for Roads and Bridges” (DMRB). This has already been questioned but is clearly still being relied upon to try and demonstrate impact. Whilst ESC accepts it may be useful as a supplementary indicator, it does not agree with its use as a fundamental piece of guidance to this project and BS5228 should be the primary standard that controls noise and vibration impact in line with other comparable projects in this area and nationally. The calculated magnitude of impact from DMRB could obscure the real world felt impacts of this project and ESC would prefer to rely on the practical noise and vibration control measures and principles of BS5228 as has been agreed.	Noted. Please see response to 7.4.4.4 – 7.4.4.7 above.
7.4.5.1	Noise and Vibration – Sea Link Operation	In terms of Operational Noise and Vibration, it is important to note ESC's fundamental requirements which have been communicated to the Applicant, both verbally and in writing, and appear in their assessment documents. ESC's current stance on noise from developments of this nature in this district may be summed up by the following condition used in Town and Country Planning Act applications, but is equally relevant here and has been stated for this and other DCO projects ESC are involved with:  <i>‘Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified’</i>	Please see response to 6.3.3.6 above.
7.4.5.2	Noise and Vibration – Sea Link Operation	Due to the size of these types of projects the 5dB below background is an aspirational target and one ESC asks developers to consider as the appropriate limit. Deviation from this level will require robust justification and the aim in all cases should be to achieve the lowest possible sound level which will also require robust justification. This should be in line with all relevant standards, guidance and policy. The developer is reminded of the overarching principles of NPS EN-1 and the Noise Policy Statement for England (NPSE) in terms of noise and vibration and particularly the requirement to mitigate and minimise adverse noise impact and avoid significant adverse impact but also that the project should “ <i>where possible, contribute to improvements to health and quality of life through the effective management and control of noise</i> ”.	Please see response to 6.3.3.6 above.
7.4.5.3	Noise and Vibration – Sea Link Operation	It is essential that the design and location of infrastructure is considered in terms of noise assessment; this must be in terms of Sea Link in isolation and cumulatively at the site with future projects dependent on the information available. Noise impacts must be fully considered in relation to not only the co-located converter station site at Saxmundham, but also in terms of overhead lines and the proposed Friston substation (i.e. switchgear noise emissions – being impulsive in character and operation).	Please see response to 6.3.3.6 above.
7.4.6.1	Noise and Vibration – Sea Link Decommissioning	The developer must notify the Local Planning Authority prior to any decommissioning activities commencing, and ESC therefore welcomes this being secured under Requirement 13. A full Noise Management Plan which meets BPM should be submitted in writing to the Local Authority for approval prior to commencement.	Requirement 13 requires that “ <i>a written scheme of decommissioning must be submitted for approval by the relevant planning authority at least six months prior to any decommissioning works</i> ”. It is therefore expected that noise management proposals during decommissioning would be included in this written scheme



Reference	Matter	Point Raised	Applicant's Comments
7.4.7.1	Best Practicable Means (BPM)	The Applicant has committed to Best Practicable Means with respect to work and mitigation for construction works. This is welcomed but mentioned here due to its importance as one of the guiding principles for this project. The expectation is that the Applicant will commit to reducing noise and vibration from construction work to the absolute reasonable minimum by employing Best Practicable Means. This is irrespective of agreed noise and vibration levels which should be seen as the level to avoid not the target to achieve. In terms of precedent, the SPR EA1N and EA2 projects use Control of Pollution Act Section 61 notifications as an ongoing means to demonstrate BPM throughout construction and its use should be considered for this project. This will also provide the opportunity to detail the monitoring that will be in place to verify that impacts are being adequately addressed.	Noted and agreed. It is agreed in principle that some construction activities may benefit from a Section 61 application for prior consent. These would be undertaken by the contractor through consultation with East Suffolk Council on case-by-case basis.
7.4.8.1	Mitigation	Along with the selection and adoption of clear noise and vibration limits for construction, mitigation measures are key for the reduction and prevention of impact. BPM is the standard expected, and this has been committed to, which is welcomed. However, ESC notes that the assessments in Part 2 Suffolk Chapter 9 Noise & Vibration of the ES [AS-109] have identified a number of potential significant impacts, but these significant impacts disappear with mitigation. ESC will need more detail in respect to mitigation including likely attenuation performance in order to be confident that works can be controlled so as to avoid significant adverse effects and minimise adverse effects.	As noted above, there are no statutory noise limits. The principle is to avoid significant adverse effects, and mitigate and minimise adverse effects. Noted with regards to best practicable means (BPM). With regards to receptors where there are potential significant adverse effects, this is without out mitigation. This approach was taken to identify locations ('hot-spot's) where mitigation is <u>required</u> to avoid significant adverse effects. The applicant is confident that significant adverse effects can be avoided at these locations with the implantation of BPM. However, the specific mitigation measures can only be determined by the contractor, informed by their detailed assessments. As noted above, if there are situations where the noise level thresholds are likely to be exceeded despite the use of BPM, temporal restrictions would then be required, as part of BPM, to avoid significant adverse effects.
7.4.8.2	Mitigation	Although Table 9.22 gives examples of mitigation with ranges of likely attenuation, there is some uncertainty in the approach. Ultimately the applicant will be required to comply with appropriate noise and vibration limits, and ESC will need to be confident this is achievable. This is not withstanding the requirement to use BPM to reduce noise and vibration to a reasonable minimum. Table 9.23 attempts to demonstrate predicted noise levels with mitigation, however ESC will require further detail in terms of what mitigation has been applied, what uncertainty there is in the calculations given the wide range of potential attenuation in Table 9.22, and how this represents BPM, in order to be confident that these levels are achievable.	Noted and agreed with regards to further detail being required. Further detailed construction noise and vibration assessments will be undertaken by the contractor, secured though commitment NV03 of <b>Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]</b> . As noted above, there are no statutory noise limits. The principle is to avoid significant adverse effects, and mitigate and minimise adverse effects.
7.4.8.3 – 7.4.8.4	Mitigation	There are also multiple mentions of 'temporal restrictions' that nullify a number of significant impacts. ESC acknowledges the examples of temporal restrictions provided in the Covering Letter to the Applicant's response to the ExA's s89(3) letter of 5 September 2025 [AS-106], including alternate weekend working, alternate weekend day working, working no more than two weekends in any consecutive three weekends, and no more than four weekends of working in any consecutive eight weekends. Although ESC acknowledges that the Applicant is proposing a range of mitigation measures in addition to these temporal restrictions, including screening and the use of quieter plant, ESC is concerned that the ES places considerable reliance on temporal restrictions to avoid effects being assessed as significant. Whilst these temporal restrictions are welcomed by ESC, it should be emphasised that the magnitude of noise and vibration effects must be reduced to a reasonable minimum at the times when work is being carried out, rather than relying on mitigation of alternate weekend working or similar to reduce impacts. Given the prominence of these 'temporal restrictions' in the mitigation scheme, ESC considers that further detail is required.	Noted. Please see response to 7.4.4.4 – 7.4.4.7 above.

Reference	Matter	Point Raised	Applicant's Comments
		<p>Noting that significant effects are ruled out during weekend working due to 'temporal restrictions', notwithstanding ESC's opposition to weekend working (as defined by BS5228-1), any assessment of significance in this period should be based on the weekend criteria of the table E.1 of BS5228-1. ESC will expect a robust and detailed monitoring strategy to be developed to verify the predictions made in this application and to ensure that noise and vibration limits are being complied with.</p>	
7.4.10.1	Contaminated Land	<p>The developer has undertaken a Preliminary Contamination Risk Assessment [APP-116], Generic Quantitative Risk Assessment [APP-120] and Ground Investigation Report [APP-119]. These reports have not indicated any locations where contamination is likely to exist beyond a low risk to human health. Assessments have been carried out in line with the principles of the Environment Agency's Land Contamination Risk Management (LCRM) – this is the applicable guidance in this respect. Whilst the current risk of contamination is low, and ESC accepts the point that much of the route is isolated and agricultural or wild in nature, this does not preclude the possibility of unknown contamination that may be encountered during the development given the amount of excavation required.</p> <p>ESC notes that measure GH08 listed in Appendix A – Outline Code of Construction Practice of the Outline CEMP [APP-341] states that a protocol will be developed for managing any unexpected contaminated land. This plan should contain a robust discovery strategy and procedures for managing contamination. This procedure must include consultation and agreement with the Local Planning Authority in respect of investigation and remediation required in the event this scenario occurs. For clarity, East Suffolk Council's usual Condition for 'unexpected contamination' is provided below:</p> <p><i>“Unexpected Contamination Condition: In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks and relic structures) shall take place until this condition has been complied with in its entirety. An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons (see Annex 2 of the National Planning Policy Framework) and conform with prevailing guidance (including BS8485:2015+A1:2019, BS 10175:2011+A2:2017 and Land Contamination Risk Management) and a written report of the findings must be produced. The written report is subject to the review and confirmation in writing by the Local Planning Authority that likely risks have been identified and will be investigated accordingly. Where remediation is necessary a detailed Remediation Strategy (RS) must be prepared, and is subject to the review and confirmation in writing by the Local Planning Authority as likely to address the risks identified. The RS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The RS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works. Following completion of the remediation strategy a verification report that demonstrates the effectiveness of</i></p>	<p>Commitment GH08 listed in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b>, will be updated to add further detail to the commitment following consultation with the Environment Agency further to their Relevant Representation</p>

Reference	Matter	Point Raised	Applicant's Comments
		<i>the remediation must be submitted to, reviewed by and confirmed in writing by the LPA as likely to have addressed the risks identified."</i>	
7.4.10.3	Contaminated Land	ESC understands that the former RAF Leiston Airfield is within the scoping boundary. Any ground works on the site, or in close proximity, should test for the presence of PFAS.	The former RAF Leiston Airfield is not located within the study area for contaminated land of 250m now that the Order Limits have been refined.
7.4.10.5	Contaminated Land	Any Material Management Plans (MMPs) should be submitted to the Local Authority for approval prior to excavations commencing. Records of any soils removed and/or disposed of from the site shall be retained and made available to the Local Authority on request.	Noted
7.4.11.1	Private Water Supplies	The district has numerous Private Water Supplies that could be sensitive to some of the construction methods likely to be employed by the project (such as trenchless ducting and dewatering if required). The developer should engage with ESC to ensure that these Private Water Supplies are considered, and where necessary, measures are taken to ensure that the supplies are not affected by works associated with the proposed Sea Link project.	Private Water Supply information has previously been obtained from East Suffolk Council, the locations of which are shown on <b>Application Document 6.4.2.5.3 Groundwater Receptors [APP-232]</b> and the information included within <b>Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]</b> . Commitment W08 included within <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b> , also requires that active private water supplies will be identified with landowners through landowner discussions.
7.4.12.2	Air Quality	<p>ESC notes that suggested control measure GG12 listed in Table 1.1 of Appendix A – Outline Code of Construction Practice of the Outline CEMP <a href="#">[APP-341]</a> has been weakened. The IAQM guidance requires that ‘all vehicles switch off engines when stationary - no idling vehicles’, but control measure GG12 has been changed to ‘when not in use’. ESC would like to see any idling or stationary engines switched off where this will reduce emissions (considering impact on start-up and length of idling).</p> <p>ESC will also require a commitment to projected weather forecasts to take account of any predicted periods of particularly dry or windy weather so that extra mitigation can be planned and delivered.</p>	<p>Measure GG12 included within <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b> is based on the Institute of Air Quality Management construction dust guidance. For health and safety purposes, it has been re-worded from ‘no idling vehicles’ to ‘ensure all vehicles switch off engines when not in use and when it is safe to do so’, as there may be rare occasions where switching off a vehicle engine could compromise safety. For example, emergency situations, maintaining essential vehicle systems (such as lighting or climate control in extreme conditions), or when rapid vehicle movement is required. The revised wording maintains a strong commitment to minimising unnecessary idling, whilst allowing for exceptions only when safety would otherwise be at risk.</p> <p><b>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</b> already includes commitments to increase visual dust assessments and review mitigation measures in periods of dry weather. <b>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</b> will be updated at a later deadline to include a requirement for weather forecasts to be checked on a daily basis. Should periods of particularly dry or windy weather be forecast, dust mitigation measures would be reviewed and where possible high-risk activities will be rescheduled to minimise air quality impacts on sensitive receptors.</p>
7.4.12.3	Air Quality	<p>With reference to emissions, Air Quality modelling of emissions from vehicles associated with the development has been undertaken <a href="#">[APP-133]</a>. Comparison of the input data for the air quality modelling to traffic data within the transport/traffic documents is difficult and requires further justification.</p> <p>Several commitments to vehicle emission standards (Euro standards) and Stage IV/V NRMM have been proposed, and these are welcomed, but will require further justification and discussion.</p> <p>It is important that monitoring of these commitments is agreed with the local authorities, and a reporting mechanism decided. It would seem sensible for this to be combined with the monitoring and reporting requirements listed within the</p>	<p>As outlined in <b>Application Document 6.3.2.8.B ES Appendix 2.8.B Air Quality Modelling Methodology [APP-133]</b>, the traffic data used for the assessment was provided by the AECOM transport planning team. It should be noted that the data format and structure required for air quality modelling differs from those used in transport and traffic assessments. The traffic modelling as detailed within the transport documents is the basis of the information used to inform the air quality assessment.</p> <p>In relation to the proposed emission standards for vehicles, Euro VI is currently the most stringent standard for Heavy Goods Vehicles (HGVs) in the UK.</p>



Reference	Matter	Point Raised	Applicant's Comments
		Outline Construction Traffic and Management and Travel Plan – Suffolk <a href="#">[AS-008]</a> , through the Traffic Management and Monitoring system.	<p>For Non-Road Mobile Machinery (NRMM), the use of Stage IV/V compliant equipment has been proposed. These standards are currently mandated for NRMM operating within London and represent a more stringent requirement than those applicable in other parts of the UK.</p> <p>In terms of monitoring vehicles, monitoring would be undertaken using a Traffic Management and Monitoring System (TMMS), as detailed in <b>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]</b>. The TMMS will be developed to provide details of the technologies and other means employed to monitor vehicle movements to/from the site. The data from the TMMS would be used to confirm that all HGVs entering the Site meet the Euro VI standard and would be recorded in detailed site logs by the contractor, as specified in <b>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</b>.</p> <p>In regards to monitoring NRMM, <b>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</b> 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>
7.4.12.4	Air Quality	Control measure AQ01 listed in Table 1.1 of Appendix A – Outline Code of Construction Practice of the Outline CEMP [APP-341] commits the applicant to develop and implement an Air Quality Management Plan (AQMP), to be approved by the Local Authority. This gives reassurance that should any matters arise through the process of examination or beyond, these can be incorporated into the control document. There should be a commitment to update this document throughout the lifetime of the project if required, as determined by either the applicant or Local Authority. Consideration should be given to the production of separate AQMPs for each stage of the onshore works.	<p><b>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</b> states that the document will be updated if required. This text will be updated at a later deadline to explicitly confirm that the Air Quality Management Plan (AQMP) will be reviewed and updated throughout the construction phase of the project as necessary, based on monitoring results.</p> <p>Having a single AQMP covering the entire construction period is considered the most effective approach. This ensures continuity, avoids gaps in air quality management, and provides a consistent framework for monitoring and implementing mitigation measures across all phases. Should specific requirements arise for particular stages, these can be addressed by updating the AQMP as needed.</p>
7.4.12.5	Air Quality	It should be noted that ESC has now revoked the Stratford St Andrew Air Quality Management Area (AQMA). Consideration of the impacts of construction site traffic on this area (and others) is still important and the control measures proposed should still be implemented. The National Planning Policy Framework requires opportunities to improve air quality or mitigate impacts to be identified and taken forward, and NPS EN-1 section 5.2 clearly communicates the importance of energy infrastructure schemes considering measures to mitigate emissions.	<p>Acknowledgement is given to the revocation of the Stratford St Andrew Air Quality Management Area (AQMA); however, the continued importance of controlling and minimising air quality impacts from construction traffic in this and other sensitive areas is recognised. Several measures have been proposed to minimise emissions including GG12, AQ04, AQ09, as outlined in <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b>. Measures including encouraging the construction staff to use sustainable transport and monitoring HGV movements and compliance with HGV routes are also included in <b>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]</b>.</p>
7.4.13.1	Light	All lighting will need to be designed and installed with the prevention of nuisance in mind, be this temporary task lighting, semi-permanent compound lighting or permanent operational lighting. Lighting should be kept to a practical minimum to satisfy the task and health and safety requirements. Given that in many cases complaints of light nuisance can be easily and quickly resolved, a clear and robust complaints procedure should be developed to address concerns regarding light nuisance, and this should include rapid investigation and, where appropriate, resolution of the matter.	<p>The Applicant is committed to conserving and enhancing the natural beauty of the landscape, including a dark skies policy pertaining to use of lighting on the new infrastructure and maintenance activities. This is noted within <b>Application Document 7.12.1 Design Principles – Suffolk [APP-366]</b> at N.4 within Table 3.1.</p>
7.4.14.1	Complaint Procedure	There are various references within the Applicant's submission documents regarding the recording of complaints, and the proposals for public communication	<p>The Applicant acknowledges this request and will, during the course of ongoing engagement, discuss appropriate mechanisms and timings for relaying complaints to the local authority.</p>

Reference	Matter	Point Raised	Applicant's Comments
		appear reasonable. Details of public complaint response times, method of recording, and reporting to the local authority should be considered further.	
<b>7.5 Health and Wellbeing</b>			
7.5.1	Working hours	As discussed earlier in the Environmental Protection section of this LIR, Section 3.3 of the Environmental Statement Non-Technical Summary [AS-016] states that <i>‘the core construction working hours would be...07:00 to 19:00 Mondays to Fridays; and 07:00 to 17:00 on Saturdays, Sundays and Bank Holidays... this excludes start up and close down activities, which can take place for up to one hour either side of the core working hours.’</i> It is also noted that <i>‘there are operations that may take place outside of the core working hours including operations commencing during the core working hours which cannot safely be stopped; surveys or monitoring; and operations requested by a third party, for example highway works to avoid disruption to the local road network at peak times.’</i> This is unacceptable. It cannot be stressed overmuch that increases in working hours can have significant adverse effects on people’s health and wellbeing. ESC has continually stressed throughout the pre-application engagement with the Applicant that the East Suffolk district is home to multiple consented, planned, and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which will compound the effects on people’s health and wellbeing.	A response to this comment can be found in Table 1.10 (References <i>ESC – Working Hours</i> ) and Table 1.11 (References <i>ESC – Mental Health and Wellbeing</i> ) of <b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b> .
7.5.2	Engagement	It is essential that NGET genuinely engages with the local communities and parish and town councils on these issues – which has not been the case hitherto. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to the impacts created by a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the Sea Link proposals will further exacerbate these existing issues.	A response to this comment can be found in Table 2.11 (References <i>ESC – Mental Health and Wellbeing</i> ) of <b>Application Document 9.34.1 Applicant’s Responses to Relevant Representations: East Suffolk Council [REP1A-043]</b> .
7.5.4	Mental health	Suffolk Mind published a report titled ‘Wellbeing in Aldeburgh, Leiston & Saxmundham’, exploring the impact of the many NSIPs facing the area on the local population’s mental wellbeing using data collected in collaboration with East Suffolk Council <sup>2</sup> . The study found that “57% of residents [in the Aldeburgh, Leiston and Saxmundham area] feel that local energy projects are a barrier to their mental wellbeing to some extent”. This is an alarming statistic which evidences the real impact NSIPs, including Sea Link, are having on the mental health of residents of East Suffolk. Four key themes in relation to NSIPs were identified as negatively affecting wellbeing: <ul style="list-style-type: none"><li>• perceived poor communication with NSIP developers;</li><li>• the change and loss of habitats and green spaces in the local area;</li><li>• feelings of insecurity, including financial insecurity, regarding the impacts of the NSIPs; and</li><li>• increased anxiety and stress, including due to concerns about their housing situation and impacts on the local environment.</li></ul>	The Applicant acknowledges the comment raised. Further detailed response will be provided at a later deadline.

<sup>2</sup> <https://www.suffolkmind.org.uk/wp-content/uploads/2025/08/Aldeburgh-Leiston-and-Saxmundham-Wellbeing-Report.pdf>

Reference	Matter	Point Raised	Applicant's Comments
<b>7.6 Public Rights of Way</b>			
7.6.1	PRoW	<p>The Outline Public Rights of Way (PRoW) Management Plan – Suffolk <a href="#">[APP-352]</a> also sets out additional PRoW that will be affected by associated infrastructure works. Public enjoyment and amenity value are key considerations for PRoW. It is important that the quality of the user experience is not diminished and instead PRoW are protected and enhanced (where practicable). Key routes should be identified and considerations given to prevent loss of amenity value and to prevent disruption to sustainable transport options surrounding popular travel destinations, employment and education. The health and wellbeing of local communities is also an important consideration. Popular local routes should be considered just as important as promoted routes.</p>	<p>Responses to comments relating to Public Rights of Way (PRoW) and <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> have previously been provided within Table 2.10 SCC - Public Rights of Way in response to SCC's RR (<b>Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP1A-043]</b>). Further details have also been provided further below for ease of reference.</p> <p>The proposed management and mitigation relating to PRoW is set out within <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> 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 (including potential disruption to PRoW users). This has been developed in consultation with the relevant Local Highways Authorities and PRoW officers and provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases of the Proposed Project.</p> <p><b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> assesses the likely significant effects on amenity of PRoW users and access to open space, drawing on assessment from of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> and <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b>. The cumulative impact is also assessed in <b>Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>. No significant adverse effects are identified with regards to human health and wellbeing.</p> <p>The LVIA has provided an assessment on appropriate users of Public Rights of Way and the recreational receptors are set out within Table 1.9 of <b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b>. The detailed assessment should be referred to within <b>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</b>. This includes a summary of likely effects on visual receptor groups at 1.1, including recreational receptors.</p>
7.6.2	PRoW	<p>Where permanent or temporary diversions are required, consideration must be given to the relevant user groups (defined by the status), recorded widths, vulnerable users, user enjoyment and surface condition. Diversions should not be considered in isolation to prevent network fragmentation and loss of enjoyment/amenity value. The overriding objective should be to prevent disruption. Temporary closures should be considered as a last resort if no other options to ensure public safety are possible. Options should be explored with SCC and ESC in the first instance.</p>	<p>The comment is noted and agreed, as per the response provided to 7.6.1 above. One of the key aims, set out in <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]</b> will be to maintain the connectivity between routes when any temporary or permanent closures and diversions are in place, to allow PRoW users to use alternative routes if desired.</p> <p>Consideration has been given to users of the permanently diverted Public Right of Way through the proposed Saxmundham Converter Station site. This is noted within the Embedded Mitigation Section (1.7) in the Landscape and Visual chapter (<b>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</b>).</p>



Reference	Matter	Point Raised	Applicant's Comments
<b>7.7 Community Benefits and Compensation</b>			
7.7.1 – 7.7.3	Community Benefits and Compensation	<p>The benefits of security of electricity supply are felt nationally, but the impacts of hosting such large infrastructure are felt by communities closest to it. These impacts are felt during the lifetimes of these projects, from construction, operation, to decommissioning. It should be noted that these impacts are created in a context where no significant economic benefit in the immediate area once the construction phase is over is provided.</p> <p>It was noted that at the webinars held early in the pre-application stage that there were questions from the public about potential financial and community benefits for local communities affected by the construction of the project. If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. ESC would welcome further engagement with the Applicant on this matter.</p> <p>It is important that community benefits remain distinctly separate from the need to adhere to the mitigation hierarchy, first to avoid, then to mitigate, and only if mitigation is not adequate, to compensate. As part of this process, it is important that long-term enhancement and legacy opportunities are maximised.</p>	<p>The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country.</p> <p>In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. The Applicant is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner</p>
7.7.4 – 7.7.5	Mitigation hierarchy	<p>Where residual harm is identified across the onshore order limits following the application of the mitigation hierarchy, ESC expects NGET first to look to mitigate the effects, and then where appropriate to look at compensation for residual impacts. ESC requires further discussion with the Applicant as to how to compensate the residual impacts.</p> <p>ESC understands that some communities may have their own ideas on how to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that Sea Link is not being developed in isolation - there are multiple other projects proposing compensatory measures so there is potential for NGET to co-ordinate compensation associated with Sea Link with other measures agreed with other project promoters. In this context, ESC draws the ExA's attention to the details contained within the Section 111 agreements with ESC for the SPR East Anglia ONE North and TWO offshore wind farms<sup>18</sup></p>	<p>In developing the Proposed Project, the mitigation hierarchy has been rigorously applied by the Applicant, as part of the approach to consenting set out in <b>Application Document 7.3 Design Development Report [APP-321]</b> and as part of the iterative process of EIA. The avoidance of environmental designations and other environmental constraints is an important factor which informs the Applicant's site selection process.</p>
<b>7.8 Socioeconomics, Leisure and Tourism</b>			
7.8.3.1 – 7.8.3.7	Baseline Conditions and Assessment	<p>ESC is deeply concerned that the assessment of baseline conditions fails to account for an increasingly dynamic economic environment in East Suffolk.</p> <p>Whilst the Applicant's assessment [APP-057] is considered to meet existing requirements and guidance, ESC considers that the assessment needs to go further. A baseline is simply that, a reference point or snapshot of conditions at a single point in time, and without ongoing monitoring and evaluation, changes in baseline conditions cannot be assessed and the effects on socioeconomic, leisure and tourism receptors cannot be determined.</p> <p>East Suffolk is unusual, and perhaps unique, in the number and scale of energy NSIPs and other major developments either being constructed or planned for</p>	<p>The baseline conditions presented in Section 10.7 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> set out the existing socio-economic characteristics of the Study Area, benchmarked against regional and national indicators. The baseline covers population and deprivation, employment, the local economy and labour market, and the existing characteristics of the site and its surroundings.</p> <p>To account for potential future changes, Section 10.7 also defines a future baseline, incorporating projected demographic trends and planned development land. The level of detail, structure and content applied is consistent with the approach used for other comparable NSIPs.</p>

Reference	Matter	Point Raised	Applicant's Comments
		<p>construction over the next decade. Many of these have been shortlisted and described within Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].</p> <p>The impacts resulting from these developments means that it is difficult to predict future baseline conditions out to 2031 with any degree of accuracy. Equally, it is difficult to disaggregate certain impacts of the proposed Sea Link project from other significant infrastructure projects locally.</p> <p>ESC considers it essential to understand the changing baseline conditions during the construction period of the Suffolk Onshore Scheme, especially the direct and indirect impacts, positive and negative, affecting employment and labour supply, supply chain activity, local accommodation facilities, impacts on PRow and recreational routes, key sectors such as tourism, and individual receptors including businesses and local visitor and high street destinations.</p> <p>ESC is firmly of the view that the desk-based methodology is insufficient for the conditions described, and requires the applicant to work with ESC and commit to the following:</p> <ol style="list-style-type: none"><li>1. To review and update their assessment of baseline conditions immediately prior to commencement of construction of the Suffolk Onshore Scheme, thereby ensuring that baseline conditions are current.</li><li>2. To discuss and agree the scope and frequency of ongoing monitoring and reporting of socioeconomic conditions during the construction phase of the project.</li></ol>	<p>The Applicant recognises that East Suffolk is set to host a number of major infrastructure projects. By outlining an existing and future baseline, supported by the cumulative assessment in <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>, the Applicant is confident that this approach provides an appropriate and proportionate basis for assessing likely significant effects. The baseline and future baseline together allow the assessment to take account of foreseeable change without requiring ongoing monitoring, which is not typically a requirement for baseline characterisation in NSIPs.</p> <p>The Applicant will give consideration to ESCs proposal to undertake monitoring of socio-economic receptors during construction and will respond in due course.</p>
7.8.4.4 – 7.8.4.5	Cumulative impacts	<p>In Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] and Appendix 2.13.A to this chapter [APP-141], the Applicant shortlists 28 developments for the inter-project cumulative effects assessment. Of these, only six developments were identified as having potentially cumulative effects upon shared socio-economic, recreation and tourism receptors.</p> <p>Ultimately, the published conclusion is that no significant cumulative effects on socioeconomics, recreation and tourism are expected because of the Suffolk Onshore Scheme. ESC finds the Applicant's conclusions surprising, dismissive and entirely unacceptable. It is simply not credible to assert that the Suffolk Onshore Scheme, when considered in combination with other developments, including Sizewell C, perhaps the largest civil construction project in the UK, will not result in any significant inter-project cumulative effects on socio-economic, recreation and tourism receptors, whether positive or negative.</p>	<p>The Applicant acknowledges the importance of East Suffolk's tourism economy and the concerns raised by the Council regarding potential cumulative impacts from multiple Nationally Significant Infrastructure Projects.</p> <p><b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b> of the Environmental Statement assesses the inter-project cumulative impact of Sea Link in addition to other projects including Nationally Significant Infrastructure Projects. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in inter-project 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. These study areas have been determined in line with comparable DCO applications and relevant guidance such as the DMRB (LA112). 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 <b>Application Document 7.5.3.1 CEMP Appendix</b></p>
7.8.4.7 – 7.8.4.9	Cumulative impacts	<p>ESC notes that when establishing the 'zone of influence', or study area, the Applicant has indicated that professional judgement was necessary in assessing economic impacts within a 60-minute travel area from the Suffolk Onshore Scheme Boundary, and that combined effects on individual businesses and attractions were only measured out to 500m from the Suffolk Onshore Boundary. Measuring combined effects within 500m of the boundary will not reflect the true</p>	

Reference	Matter	Point Raised	Applicant's Comments
		<p>extent of the socioeconomic influence, especially in rural areas where businesses and accommodation providers often service wider catchment areas.</p> <p>There is no doubt that there is a spatial and temporal overlap between the two projects and ESC believes that the limitations inherent within the area of study, combined with the subjective nature of professional judgement, have underestimated the potential for cumulative effects within the assessment.</p> <p>As a consequence, ESC requests that the Applicant commits to ongoing monitoring and reporting on the condition of socioeconomic receptors throughout the construction period. This would enable meaningful comparison against an up-to-date baseline and support proactive planning for worst case scenarios, particularly those arising from the overlapping peak construction phases of the Suffolk Onshore Scheme, Sizewell C, and other major developments that may collectively impact local socioeconomic, recreational, and tourism assets.</p>	<p><b>A Outline Code of Construction Practice [APP-341]</b>, 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 will give consideration to ESCs proposal to undertake monitoring of socio-economic receptors during construction and will respond in due course.</p>
7.8.5.4	Construction Phase: Economic Impact	<p>ESC welcomes the opportunity that Sea Link presents in generating direct and indirect employment, training, and apprenticeship opportunities, both on site and in the supply chain. However, ESC would like to be reassured that any direct or indirect employment opportunities are accessible to the resident population of East Suffolk, and that any potentially negative effects on employment, such as displacement, continue to be suitably assessed and mitigated.</p>	<p>The Applicant notes the Council's encouragement to recruit the construction workforce locally. The home-based workers assessment is set out in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b>. As set out in Table 10.20, in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage; the proportion of jobs taken-up by people who live inside of the Study Area, here defined as a 60-minute travel area. This Study Area is based on research by the Chartered Institute of Personnel and Development (CIPD) which found that 90% of national employees commuted for 60 minutes or less each way. The leakage rate has been estimated to be 30%, given the specialised nature of the construction roles which may require sourcing labour from outside the local area. This figure has been determined using professional judgement and is informed by assumptions used in other comparable Nationally Significant Infrastructure Projects. Applying the 30% leakage rate to the average net additional employment, it is estimated that approximately 20 construction jobs per annum would be taken up by residents within the Study Area.</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>
7.8.5.5	Construction Phase: Economic Impact	<p>The Applicant is proposing construction activity on Sundays and bank holidays. This remains a serious concern. These are peak trading days for the visitor economy and are essential for sustaining the viability of many small businesses.</p>	<p>A response to this comment regarding the impact of construction working hours on businesses can be found in Table 13 of <b>Application Document 9.34.6 Applicant's Thematic Responses to Relevant Representations [REP1-116]</b>.</p>
7.8.5.6	Construction Phase: Economic Impact	<p>ESC urges a firm commitment to avoid core tourism periods and prioritise coordination with local events calendars.</p>	<p>The Applicant will give consideration to ESC's proposal,</p>



Reference	Matter	Point Raised	Applicant's Comments
7.8.5.7	Construction Phase: Economic Impact	ESC notes the opportunities to improve awareness of the wider energy sector across East Suffolk and the high value/high skill employment and apprenticeship opportunities available. The decision maker needs to be able to balance the potential benefits which may result from the temporary employment, training and apprenticeship opportunities created against the disbenefits of the project.	See response to reference 7.8.5.4
7.8.6.1 – 7.8.6.8	Accommodation	<p>Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] suggests that in a 'worst case scenario' where the peak construction workforce for the Suffolk Onshore Scheme and the construction of other developments, including Sizewell C, coincide, there would be negligible impact on the hotel, bed and breakfast, and inns accommodation sector.</p> <p>However, ESC is concerned that these conclusions are premature and that the impacts cannot be adequately assessed until such time that the timings of peak construction for Sizewell C and the Suffolk Onshore Scheme are confirmed.</p> <p>Sizewell C is expected to have a peak construction workforce of 7,900 workers, of which an estimated 2,900 of the non-home-based workers are expected to live off site. This requirement when combined with an estimated workforce accommodation requirement for the Suffolk Onshore Scheme of 86 workers, although relatively small, could adversely affect an overstretched private sector rental and visitor accommodation sector.</p> <p>The utilisation of a 60-minute Drive Time Catchment Area, whilst sensible, fails to factor in the potential consequences of human behaviour where workers gravitate towards accommodation that is closer to their place of work in the first instance, and then radiate outwards and towards the limits of the assessed Catchment Area.</p> <p>In this scenario, private sector rental and visitor accommodation within east Suffolk would be utilised by workers first, potentially distorting the market, displacing residents, and reducing the availability of accommodation for visitors.</p> <p>The influx of workers, not just from those directly employed by developers but also indirectly through supply chains is unprecedented and estimates of numbers is an imprecise science.</p> <p>ESC is sufficiently concerned that the Suffolk Onshore Scheme could adversely tip the balance of accommodation availability, even if the worst-case scenario of peak construction for SZC and Sea Link coinciding does not materialise, that internal working groups are independently assessing the existing accommodation stock and testing availability under various scenarios. This work is ongoing, and the outcomes are yet to be published.</p> <p>ESC would welcome the Applicant's ongoing monitoring and publication of workforce projections throughout the construction period.</p>	<p>The Applicant notes the Council's concern regarding the potential for adverse impacts on tourist accommodation. <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> conducts an assessment to evaluate whether existing hotel, bed and breakfast, and inn accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]</b> also assesses the inter-project cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor.</p> <p>The Applicant will give consideration to ESCs proposal to undertake monitoring of socio-economic receptors during construction and will respond in due course</p>
7.8.7.3	Tourism	ESC strongly disagrees with the conclusions drawn in Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057] and Part 2 Suffolk Chapter	A response to this comment can be found in Table 1.13 (References <i>ESC – Socio-economics, Leisure and Tourism</i> ) of <b>Application Document 9.34.1 Applicant's</b>

Reference	Matter	Point Raised	Applicant's Comments
		13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] that there will be no significant effects, cumulative or otherwise, caused by the Suffolk Onshore Scheme on socioeconomic, leisure and tourism receptors within the Study Area.	<b>Detailed Responses to Relevant Representations: East Suffolk Council [REP1A-043].</b>
7.8.7.5 – 7.8.7.6	Tourism	<p>ESC considers that the assessment methodology used is insufficient and fails to account for the complexities and interdependency of socioeconomic receptors in a successful visitor economy. For example, limiting the Study Area to 500m from the Onshore Scheme Boundary does not adequately assess the impacts of construction on a bed and breakfast receptor located beyond the Study Area, despite its dependence on its guests having unhindered access to local destinations such as Thorpeness and Aldeburgh, and to then visit an attraction such as The Scallop at Aldeburgh Beach.</p> <p>Chiefly, the combination of impacts resulting from the Suffolk Onshore Scheme and other developments in East Suffolk are considered to have significant effects on visitor perception and experience.</p>	<p><b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> assesses impacts on private, recreation, community and tourism assets within a 500m study area from the Proposed Project's Order Limits, which is in line with recognised guidance (such as DMRB LA112). In addition, any receptors beyond 500 m which were impacted by the Proposed Project were assessed. Economic impacts (employment generation, GVA and visitor and tourism accommodation) were assessed within a 60-minute drive time of the Suffolk Onshore Scheme, in line with research by the Chartered Institute of Personnel and Development (CIPD), which found that 90% of national employees commuted for 60 minutes or less each way.</p> <p>The assessment of visitor and tourism accommodations shows that the construction workforce could be accommodated within the visitor and tourist accommodation sector, comprising hotels, bed and breakfasts, inns and private rental properties. Under a worst-case scenario where the total peak construction workforce (327 FTE) required accommodation, there would still be approximately 1,331 rooms available, equating to 17.7% spare capacity. Therefore, the assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme and no additional mitigation will be required.</p>
7.8.7.3 – 7.8.7-7	Tourism	<p>ESC strongly disagrees with the conclusions drawn in Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057] and Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme InterProject Cumulative Effects [APP-060] that there will be no significant effects, cumulative or otherwise, caused by the Suffolk Onshore Scheme on socioeconomic, leisure and tourism receptors within the Study Area.</p> <p>The visitor economy is a complex system of interdependent factors which includes the natural environment, high quality destinations such as historic towns and villages, local attractions, restaurants, cafes, and accommodation providers. Together, these factors attract visitors and provide an exceptional visitor experience.</p> <p>ESC considers that the assessment methodology used is insufficient and fails to account for the complexities and interdependency of socioeconomic receptors in a successful visitor economy. For example, limiting the Study Area to 500m from the Onshore Scheme Boundary does not adequately assess the impacts of construction on a bed and breakfast receptor located beyond the Study Area, despite its dependence on its guests having unhindered access to local destinations such as Thorpeness and Aldeburgh, and to then visit an attraction such as The Scallop at Aldeburgh Beach.</p> <p>Chiefly, the combination of impacts resulting from the Suffolk Onshore Scheme and other developments in East Suffolk are considered to have significant effects on visitor perception and experience.</p> <p>Induced negative perceptions of the Suffolk Coast will deter visitors to East Suffolk, and for visitors there is a risk that their experience will also be impaired with a consequent reduction in repeat tourism, long-term reputational damage, and economic decline.</p>	<p>The Applicant notes that the Council has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. The Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b>.</p>
7.8.7.9 – 7.8.7.10	Tourism	ESC asks the Applicant to re-consider its assessment and the conclusions drawn. ESC believes this could be achieved by a considered holistic approach that	The Applicant notes that the Council has expressed concerns about the assessment methodology for assessing potential impact of the Proposed Project

Reference	Matter	Point Raised	Applicant's Comments
		<p>systematically evaluates the broader aspects of the visitor economy. One that extends beyond desk-based assessments, using mixed methodologies such as surveys, interviews, and additional tourism data to understand the key strengths and vulnerabilities of the visitor economy.</p> <p>ESC is sufficiently concerned about the possible inter-project cumulative effects of development locally that it is commissioning data driven tools to assess the following: 1. Visitor Perception 2. Visitor Experience 3. Accommodation Studies 4. Retail Spend Data</p>	<p>on visitor perceptions of the local area. The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. The Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b>.</p>
7.8.7.19	Tourism	<p>Should this project proceed, it is essential that the potential for negative impacts is appropriately considered, and sufficient mitigation is provided to support the continued success of the visitor economy.</p>	<p>A complete assessment of socio-economic effects has been undertaken. This is set out in <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> and concludes that there are no anticipated significant effects as a result of the Proposed Project. Therefore no mitigation is required.</p>
7.8.8.1 – 7.8.8.2	Local Business Disruption and Infrastructure Proximity	<p>The Suffolk Onshore Scheme is likely to affect numerous sensitive business premises located within 500m of the order limits. These include:</p> <ol style="list-style-type: none"><li>1. Visitor attractions</li><li>2. Small accommodation providers (B&amp;Bs, inns)</li><li>3. Hospitality venues</li><li>4. Retail outlets, including units within Saxmundham's core shopping area.</li></ol> <p>These assets are critical to the viability and vibrancy of town centres and rural visitor destinations. The Suffolk Onshore Scheme infrastructure and associated access works, both permanent and temporary, are substantial in scale, and their proximity to businesses presents real risk of:</p> <ol style="list-style-type: none"><li>1. Reduced footfall and turnover</li><li>2. Visual intrusion and reputational harm</li><li>3. Decreased property and asset value.</li><li>4. Temporary or permanent operational disruption</li></ol> <p>The potential for long-term impacts on Saxmundham's high street economy is especially concerning, given the town's role as a local service centre and its alignment with ESC's ambitions for economic growth.</p>	<p>Section 10.9 of <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> of the Environmental Statement assesses potential effects of the Proposed Project on private and community assets, recreation and tourism within 500m of the Order Limits. The assessment identified no significant effects on businesses and visitor attraction receptors.</p> <p>The Applicant also notes concerns regarding the potential for adverse impacts on visitor and tourism accommodation. <b>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</b> undertakes an assessment to evaluate whether existing visitor and tourism accommodation within a 60 minute drive of the Suffolk Onshore Scheme could meet demand from the construction workforce. The assessment shows that the construction workforce could be accommodated within the visitor and tourist accommodation sector, comprising hotels, bed and breakfasts, inns and private rental properties. Under a worst-case scenario where the total peak construction workforce (327 FTE) required accommodation, there would still be approximately 1,331 rooms available, equating to 17.7% spare capacity. Therefore, the assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme and no additional mitigation will be required.</p> <p>The Applicant recognises that there is potential for effects arising from construction of the Suffolk Onshore Scheme to impact on the visual amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Visual amenity impacts on these receptors are assessed in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b>. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant</p>
7.8.8.6 – 7.8.8.8	Local Business Disruption and Infrastructure Proximity	<p>Several retailers, including Waitrose, Tesco and Costa are located within 500m of the Suffolk Onshore Scheme Order Limits, and these, in turn, are adjacent to the main shopping thoroughfare.</p>	



Reference	Matter	Point Raised	Applicant's Comments
		<p>High Street economies are fragile, and Saxmundham is dependent on local trade as well as an influx of visitors exploring the Suffolk Coast. Whilst Saxmundham may benefit from a temporary influx of workers during NSIP construction, there are concerns that the legacy for Saxmundham could be one of boom and bust and where the character of the town, its attraction, is permanently changed.</p> <p>ESC needs to be reassured that sufficient effort will be made to mitigate the visual impacts of the Converter Station on Saxmundham, and that economic health of the town will be monitored.</p> <p>ESC remains committed to ensuring that the Suffolk Onshore Scheme suitably mitigates the potential impacts and provides suitable compensation where appropriate.</p>	<p>effect on business and tourism assets arising from construction of the Suffolk Onshore Scheme, and therefore no mitigation is required.</p>
7.8.9.4 – 7.8.9.7	Socioeconomic Summary	<p>Baselines change and the effects of NSIP development need ongoing monitoring to facilitate the development of appropriate strategies and plans to mitigate both identified and unexpected eventualities.</p> <p>Monitoring can include:</p> <ol style="list-style-type: none"> <li>1. A Tourism specific Economic Impact Assessment.</li> <li>2. Ongoing mixed methodology assessments that include quantitative and qualitative research that helps understand visitor perception and experience, including the surveying of individual economic receptors that could include monitoring of accommodation capacity and occupancy, for example.</li> </ol> <p>ESC is also mindful of the potential for beneficial socio-economic impacts and encourages the Applicant to support initiatives that support economic growth locally.</p> <p>Initiatives could include:</p> <ol style="list-style-type: none"> <li>1. An Employment and Skills Plan that supports outreach to schools, apprenticeships and local employment either directly or indirectly on the Suffolk Onshore Scheme.</li> <li>2. A Supply Chain Plan that helps local businesses identify opportunities for gaining contracts within the supply chain during the construction, operation, and decommissioning phases of the Suffolk Onshore Scheme.</li> </ol>	<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 submission it is noted that 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.</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>

# 8. Applicant's Comments on Chapter 8: Draft Development Consent Order

## 8.1 Introduction

8.1.1 This section provides the Applicant’s comments on Chapter 8: Draft Development Consent Order.

## 8.2 Comments Table

Table 88-1 Applicants Comments on Chapter 8: Draft Development Consent Order

Reference	Matter	Point Raised	Applicant’s Comments
8.1 and 8.2	Draft DCO	ESC has reviewed the Applicant’s submitted draft DCO [AS-087], having regard to the LPA’s responsibilities for enforcing and discharging the requirements for the Sea Link project, should it be granted consent by the Secretary of State.  Detailed comments on the draft DCO will be provided in due course and ESC will participate in the relevant Issue Specific Hearing.	The Applicant notes ESC’s position and welcomes ESC’s future participation in the relevant Issue Specific Hearing.

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

9.1 Introduction

9.1.1 This section provides the Applicant’s comments on Appendix A: ESC Comments on Sea Link Outline Construction Noise and Vibration Management Plan (Outline CNVMP) – Suffolk [AS-131].

9.2 Comments Table

Table 9-1 Applicant’s Comments on Appendix A: ESC Comments on Sea Link Outline Construction Noise and Vibration Management Plan

Reference	Matter	Point Raised	Applicant’s Comments
Paragraph 2.5.1	Construction hours	Construction working hours are not accepted. The full justification for this position has been stated in detail in previous responses and is also provided in Section 7.4.2 of ESC’s LIR. For reasons of providing respite to residents, the “Weekday” hours of BS5228-1 ‘ABC’ Methodology are deemed to be appropriate core working hours. This has been accepted by all other comparable projects in the district and will be the standard required by any others to follow. ESC will, however, reiterate that it accepts that there will be times that the project requires flexibility and needs to work outside consented hours and, as with other consented DCOs, ESC will accept a process whereby the project can request the ability to do so with justification of necessity for approval by ESC. This process works very well with other projects and there is no reason to believe it cannot do so here.	<p>Since publication of the Preliminary Environmental Information Report (PEIR) within Statutory consultation, the proposed construction working hours have changed. The change of these hours was consulted on as part of the Targeted consultation. The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are:</p> <ul style="list-style-type: none"><li>Monday – Friday: 0700 to 1900; and</li><li>Saturday, Sunday and Bank Holidays: 0700 to 1700.</li></ul> <p>Details relating to the proposed construction working hours and any associated restrictions are contained in <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]</b>. The working hours are secured through Requirement 7 of Schedule 3 of <b>Application Document 3.1 draft Development Consent Order [REP1-036]</b>. The impacts of construction work on Saturday afternoons, Sunday and Bank Holidays have been assessed within the EIA and this is reported within the ES within the technical chapters, where relevant. The traffic and transport assessments within <b>Application Document 6.2.2.7 Part 2 Chapter 7 Suffolk Traffic and Transport [APP-054]</b> and <b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</b> specifically include an assessment of the Saturday lunchtime period (12pm to 1pm) based on forecast construction traffic movements during the peak period of construction and does not identify the potential for significant effects as a result of the Proposed Project. Construction work, including that undertaken if and where needed on Saturday afternoons, Sundays and Bank Holidays, would be suitably controlled by (for example) <b>Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]</b>, <b>Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]</b> and <b>Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]</b>.</p>



Reference	Matter	Point Raised	Applicant's Comments
Paragraph 2.5.3	Construction hours	The list of reasons that outside consented hours work appears generally reasonable, with the exception of those delayed by weather – this should be a situation that uses a request to work outside consented hours process in order to show that it cannot be achieved another way within consented hours.	The Applicant welcomes the comment on the rationale for the works that may need to take place outside the core working hours. With respect to undertaking works delayed by weather, it is often necessary to react quickly to weather impacted work, where delays due to a protracted approvals process may result in deteriorating conditions and escalating workload. For example, exposed formations should be covered to prevent deterioration in quality as a result of being exposed to certain weather conditions.
Paragraphs 2.5.4 and 2.5.5	Construction hours	Time limitations for percussive piling and deliveries make no mention of Sundays. The CNVMP will need to reference whether these activities are included or excluded on Sundays. For reference, ESC's preference in line with its broader requirement for working hours is that they are excluded.	Paragraph 7 in <b>Application Document 3.1 draft Development Consent Order [REP1-036]</b> states that percussive piling works are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays. Therefore, percussive piling is excluded on Sundays.
Section 2.5	Construction hours	As a general comment and regardless of the specific examples above, it is suggested that the Applicant include a mechanism to request and agree outside consented hours works to provide flexibility. This is particularly important given ESC's position on core working hours but would allow for the possibility of these activities taking place outside of the circumstances given in the CNVMP.	Where works require approval prior to being undertaken these have been included within the draft DCO. With requirements to agree any percussive piling outside the restricted hours with the relevant planning authority, the movement of HGVs outside the restricted hours needing to be agreed with the relevant highway authority and any highways works outside core hours only being undertaken where requested by the highway authority. The Applicant does not consider a mechanism to request and agree all works outside the consented hours as providing the flexibility and responsiveness required for these potential works.
Paragraph 4.1.2	Role of ESC	This makes provision for contractor-led noise and vibration assessments and updates to the CNVMP but does not make reference to the role of ESC. These assessments and updates should be provided to ESC for information and agreement.	<p>Noted. The applicant proposes that the Noise and Vibration Management Plan will function as a live document, updated throughout the course of the works as assessments are completed and mitigation measures identified. All updates will be made available to East Suffolk Council.</p> <p>It is agreed in principle that situations where the noise level threshold may be exceeded may benefit from a Section 61 application for prior consent. These would be undertaken by the contractor through consultation with East Suffolk Council on case-by-case basis.</p>
Section 4.2	Control measures	The commitment to the general control measures of BS 5228-1, BS 5228-2, and Best Practicable Means (BPM) is welcomed. However, it should be made clear in this section that the stated examples of BPM are not exhaustive, and all reasonable measures will be considered. ESC suggests that a more comprehensive table of possible BPM should be added to ensure that all parties can see the scope of BPM, but it would also request that provision for a BPM review process be made so that in the event of a complaint or upon a reasonable request from ESC, this may be reviewed to ensure that BPM is being implemented for a piece of work and to identify opportunities for further mitigation or better methodology in response.	Noted and agreed with regards that the examples are not exhaustive. It is not considered feasible to provide an exhaustive list at this time, and this is best undertaken by the contractor. Please also see response to 4.1.2 above.
Section 4.3	Specific Mitigation Measures	This section refers to "Specific Mitigation Measures", but the examples listed not only reflect Section 4.2 of the Outline CNVMP but are in fact just examples of BPM. For example, if screening can be reasonably used then that is BPM, if quieter plant is available and it can reasonably be used then that is BPM, and if better alternative construction methods are available and can reasonably be used then that is also BPM. This does not appear to reflect specific mitigation	Noted and agreed. The purpose of this section to date is to detail the outline findings of the ES so that the 'hot-spots' are documented. It is the intention that this section will be updated (from paragraph 4.3.8 under the heading 'Specific Mitigation Measures Identified by the Contractor' with specific mitigation measures. This will therefore form the main section of the plan, and be updated throughout the works.

Reference	Matter	Point Raised	Applicant's Comments
		measures but what is the general expectation for projects of this nature and the CNVMP should reflect that.	
Table 4.1	Temporal Restrictions	This table refers to “temporal restrictions”. As discussed in Section 7.4.8 – Mitigation of ESC’s LIR, ESC notes that these ‘temporal restrictions’ have been relied on heavily in other documents to reduce adverse impact, and considers further detail is required. If this means avoiding triggering the number of days of noise in a number of calendar days, then this is a guidance/standard compliance measure and whilst is accepted that these standards and guidance are designed to categorise impact, simply reducing the number of days of that impact in a period of time does not in itself reflect real world mitigation. ESC accepts that it is a vital part of defining the impact on Noise Sensitive Receptors (NSRs), but this should not be at the expense of practical noise reduction measures which should form the primary mitigation for noise and vibration.	Noted and agreed. As in various responses above, the temporal restrictions are intended as a ‘catch-all’ for situations where the noise level thresholds may be exceeded, despite the implementation of best practicable means.
Paragraph 4.3.7	Vibration assessments	As with noise, further vibration assessments should be shared with ESC. Although damage caused by vibration is not specifically within ESC’s remit, ESC suggests to the Applicant that where significant vibration levels are predicted, pre-commencement property condition surveys should be carried out for the benefit of all parties to ensure that allegations of damage have a baseline and it is clear whether or not the project is or is not responsible.	Noted and agreed.
Paragraph 4.3.7 Table 4.2	Standoff distances	This lists several reasonable and sensible mitigation measures for vibration. Consideration should be given to calculation of standoff distances for the startup of vibratory rollers which are often one of the most significant contributors to vibration issues. Impact is usually more significant at startup as opposed to ‘steady state’ running of vibratory rollers, and consideration of this can form useful mitigation.	Noted and agreed.
Section 4.4	Construction Hours	Section 61 Control of Pollution Act (CoPA) is accepted as a suitable means to provide ongoing regulatory oversight and input into construction and is used as such on EA1N and EA2 with success. That said, although one of the reasons for using S.61 in this instance is to work outside core hours, it may still be useful to have a separate process for outside consented hours working as with the other projects. In reality, one of the conditions of a S.61 for a DCO consented project will be that full compliance with the CNVMP is required – this closes the circle between the DCO and S.61 and intrinsically links the two. If outside consented hours works are required but, in a timescale, quicker than the 28 days allowed for a S.61, or the need becomes apparent after the grant of a S.61, a separate process under the CNVMP can be used more expediently than a S.61 application whilst also working with S.61 if appropriate.	Noted, and potential for further discussion.
Paragraph 4.6.1	Monitoring	As routine noise and vibration monitoring is not proposed, it is vital that it forms part of any S.61 applications. There should be a mechanism for ESC to reasonably request monitoring in the event that compliance with the levels of the BS 5228-1 ABC methodology needs to be established outside of the S.61 process, or in the event that complaints are received.	Noted, and potential for further discussion. Although routine noise and vibration monitoring is not proposed, it may form part of the mitigation process under best practicable means for certain activities. Monitoring may also form part of requirements for Section 61 consents though liaison between the contractor and East Suffolk Council.

Reference	Matter	Point Raised	Applicant’s Comments
Paragraph 4.6.9	Threshold for vibration	The threshold for general vibration or 1 mm/s PPV is accepted as appropriate, being the level where complaints are likely.	Noted.
Paragraph 4.6.11	Threshold for vibration	ESC is concerned with the adoption of 12.5 mm/s PPV as an upper threshold in respect to building. Whilst this is acceptable with respect to being below the 15-50 mm/s PPV (dependent on frequency) thresholds where cosmetic damage may be possible in domestic structures, it is above the level of tolerability. The adoption of the 1 mm/s PPV in Paragraph 4.6.9 should be the primary threshold of compliance.	Noted and agreed. The 1.0 mm/s PPV threshold is the primary threshold and is applicable for buildings and structures where there are people (in relation to potential annoyance and complaint). This threshold is an order of magnitude lower than the threshold for potential risk of building damage. The higher 12.5 mm/s threshold is therefore principally to capture potential risk of damage to other ‘non-habited’ buildings and structures, such as industrial and agricultural buildings, bridges, flood defences, etc.
Section 5.6	Review process	This section should include a review process that can be requested by ESC, acting reasonably, to ensure that the CNVMP and its contents may be reviewed and amended by agreement as a result of a significant complaint or new information in respect to the works and areas in which it is taking place.	Noted. The Applicant will consider and respond on this matter at a future deadline and in ongoing discussions with ESC.



## Appendix 1: View of Hill Farmhouse from Location of Landscape VP5



**Plate A.1 View of Hill Farmhouse from Location of Landscape VP5**

The image above is taken from photography captured in order to create Landscape VP5 in **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**. It shows an adjusted field of view that includes the Grade II listed Hill Farmhouse. This image shows the farmhouse largely screened by trees in this view and demonstrates that the view is not a key view of the asset where its heritage value is conveyed. Change to this view, through the introduction of the Saxmundham Converter Station behind the modern agricultural buildings, is therefore not considered by Applicant to result in an impact upon its heritage value.