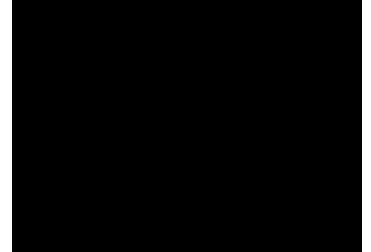


**By: File transfer system**

Sarah Holmes  
Lead Member of the Examining Authority Sea Link  
DCO  
The Planning Inspectorate  
c/o QUADIENT  
69 Buckingham Avenue  
Slough  
SL1 4PN



Our Ref  
BG/CMW/10740813

Your Ref  
EN020026

Date  
9 January 2026

Dear Ms Holmes

**Sea Link Project**

**Application Reference: EN020026**

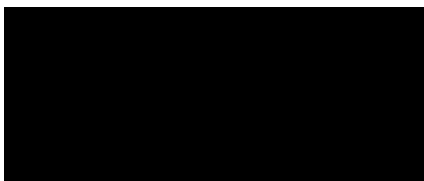
**IP Reference: FA3A16664**

We write on behalf of our client, East Suffolk Council ('ESC'), to confirm submission of the following documents at Deadline 3 (9th January) in accordance with the Examination Timetable set out at Annex A of the Rule 8 Letter dated 10 November 2025 [PD-013].

1. Updated version of the Principal Areas of Disagreement Summary Statement (PADSS) – attached with this letter; and
2. ESC Response to ExQ1 – separately via the file transfer system.

In the context of this Deadline generally, the ExA should be aware that our client has provided an update - at paragraph 1.5 of the PADSS - regarding the status of the draft Statement of Common Ground (SoCG) between ESC and the Applicant. In brief, whilst ESC has sought to assist the Applicant in its preparation of the document, for the reasons stated ESC unfortunately must, at this time, reserve its position as to the content of the draft SoCG which we understand is being submitted by the Applicant for Deadline 3.

As a consequence, ESC asks that the ExA note at this stage that, as far as our client is concerned, the draft SOCG is purely iterative in form and remains subject to comprehensive review and clarification by ESC during the course of this DCO examination.



Clyde & Co LLP

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# **Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the Sea Link Project.**

**East Suffolk Council – Updated Principal Areas of Disagreement Summary Statement (PADSS)**

**Deadline 3 (9<sup>th</sup> January 2026)**

**Application Reference: EN020026**

**East Suffolk Council IP Reference:** [REDACTED]



<p>The Planning Inspectorate National Infrastructure Planning Temple Quay House 2 The Square Bristol BS1 6PN</p> <p>Email: <a href="mailto:SouthEastAngliaLink@planninginspectorate.gov.uk">SouthEastAngliaLink@planninginspectorate.gov.uk</a></p>	<p>Application Reference: EN020026 ESC Reference: ESC Principal Areas of Disagreement Summary Statement – Sea Link – D3 Date: 09/01/2026 Please ask for: [REDACTED] BSc (Hons) MSc MRTPI – Principal Planner - Energy Projects / Solar Lead [REDACTED] – Assistant Planner Energy Projects Customer Services: [REDACTED] [REDACTED] <a href="mailto:eley@eastsoffolk.gov.uk">eley@eastsoffolk.gov.uk</a> [REDACTED] <a href="mailto:[REDACTED]@eastsoffolk.gov.uk">[REDACTED]@eastsoffolk.gov.uk</a></p>
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# Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the Sea Link Project – East Suffolk Council’s Updated Principal Areas of Disagreement Summary Statement (PADSS)

## **1. Introduction**

- 1.1 East Suffolk Council (ESC) submitted a Principal Areas of Disagreement Summary Statement to the Planning Inspectorate’s Sea Link Case Team on 26<sup>th</sup> August 2025. This was in response to the Examining Authority’s (ExA’s) “procedural decision to request from each named local authority, Marine Management Organisation and the Environment Agency a principal areas of disagreement summary statement (PADSS)” in its letter issued under s89(3) of the Planning Act 2008, dated 8 July 2025 [[PD-005](#)].
- 1.2 ESC produced its PADSS using the sample table provided in Annex A of [[PD-005](#)], and in accordance with the additional requests from the ExA for the PADSS to address, for each area of disagreement:
  - the principal issue in question;
  - a brief explanation of the concerns held by the party which they will report on in full in their Local Impact Report/ Written Representation;
  - on a without prejudice basis what, in that party’s view, needs to change/ be amended/ included so as to overcome the disagreement; and
  - in the opinion of that party, the likelihood of the concern being addressed during the examination stage.
- 1.3 This updated PADSS is being submitted by ESC in response to the ExA’s request in the Examination timetable (Annex A to the Rule 8 Letter [[PD-013](#)]) for updated versions of principal areas of disagreement summary statements (PADSS) to be submitted at Deadline 3.
- 1.4 Where matters which were included in the previous version of ESC’s PADSS have been resolved, this has been identified for clarity. Such matters will be moved to an annex of resolved issues in the next version of ESC’s PADSS, due to be submitted into the Examination at Deadline 5.
- 1.5 Whilst preparing the updated PADSS, the ExA should be aware that ESC was provided with an updated draft Statement of Common Ground (SoCG) by the Applicant on 8<sup>th</sup> December 2025 with a request that comments be returned by ESC to the Applicant by 22<sup>nd</sup> December 2025 to enable submission by the Applicant for Deadline 3 (9<sup>th</sup> January 2026) in accordance with the examination timetable as per Annex A to the Rule 8 Letter [[PD-013](#)]. ESC highlights that the revised SoCG was

split away from that of SCC to simplify the ongoing review and update process, as the combined document was becoming overly complex and cumbersome for each party to revise. The principal amendments therefore reflect the updated formatting associated with the document being split, and bringing the revised document up to date in correlation with ESC's submitted LIR [[REP1-128](#)], noting the initial SoCG submitted to the ExA was prepared solely by the Applicant and based on ESC's Relevant Representation [[RR-1420](#)]. Whilst ESC assisted the Applicant by meeting the tight document restructuring deadline before the Christmas period, enabling their submission of the revised SoCG in time for Deadline 3, ESC highlights that this did not allow sufficient time for a full and detailed legal review. It is however noted that the revised document is iterative and not final, and that there remains further legal review and clarifications to be made over the remainder of the course of this DCO examination. That review is currently being undertaken now but ESC asks the ExA to note that in the circumstances, ESC has no option but to reserve its position as to the content of the draft SoCG submitted by the Applicant for Deadline 3.

- 1.6 ESC is very conscious that both the ExA and the IPs have been commenting on the wording of the draft DCO. ESC has no wish simply to repeat the comments/questions already raised by in particular the ExA and SCC, but it does have additional points to make – or underline – which it intends to include in the next version of the draft SoCG at Deadline 5 (10<sup>th</sup> March 2026).

## 2. Updated Principal Areas of Disagreement Summary Statement (PADSS)

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
<b>Need Case</b>				
1.01	Need for the Project	<p>See Section 4 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC does not question the overarching need for the reinforcement of the existing transmission network infrastructure within East Anglia and the South East of England. However, it is extremely concerned as to the timing of the delivery of Sea Link and its relationship with the timing of other NSIPs being delivered within the East Suffolk District, in light of the anticipated onshore impacts collectively introduced by these projects. The need case is predicated on the Sizewell Generation Group. However, Sizewell C is approximately 10 years away from generating power. Nautilus is no longer proposed to connect into Suffolk and LionLink has been materially delayed as compared to the assumptions in the needs case and will be 6-7 years away from completion if and when consented. Given the completion timeframes of Sizewell C and LionLink, the project is considered to be premature and, importantly, as a result has missed opportunities for real coordination with future projects.</p> <p>Further, 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.</p>	<p>ESC and the Applicant fundamentally disagree on the need case presented for Sea Link. Agreement on need is therefore unlikely to be reached. This is confirmed by the Applicant's dismissal of ESC's concerns in its response to ESC's LIR <a href="#">[REP2-027]</a>. It is therefore clear to ESC that agreement will not be reached on need case.</p> <p>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 LionLink. Sea Link is being delivered at pace due to the overarching 'top-down' need case narrative which appears to trump any and all local impacts being introduced.</p> <p>This is apparent in the Applicant's response to ESC's LIR <a href="#">[REP2-027]</a> where NGET highlights that Sea Link is a Critical National Priority (CNP) project, being cited in National Policy and having the strong support of Government. NGET highlight '<i>NPS EN-1 further states (at paragraph</i></p>	Very unlikely

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		As stated, this is significant because 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.	<p>3.3.63) that “Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible”.</p> <p>Sea Link’s lack of meaningful coordination with LionLink’s proposed infrastructure will only result in a far greater and longer duration of community and environmental impacts during the construction phases, in an area already experiencing material impacts.</p> <p>Given the completion timeframes of Sizewell C and LionLink, the Sea Link project is considered locally to be premature despite what the Applicant has said on overarching need, and as a result, NGET has missed opportunities for real coordination (as set out in ESC’s LIR <a href="#">[REP1-128]</a>).</p> <p>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 other consented and proposed large scale infrastructure across the district.</p> <p>ESC objects to this project given the impacts it will introduce on local communities, whether alone or cumulatively with other projects. Should the Secretary of State grant consent for the project, in</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>light of the concerns raised, ESC will expect compensation to be agreed with the Applicant to offset the impacts and disruption introduced.</p> <p>The wellbeing of East Suffolk's local communities is ESC's primary concern given the significant volume of NSIP works anticipated over the next decade within the East Suffolk District.</p>	
<b>Landfall</b>				
2.01	Depth of cable burial	<p>See Section 6.1.4 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>In its LIR submitted at Deadline 1, ESC requested a scaled, cross-sectional diagram of the HDD profile from the offshore cable joint to the onshore TJB. The cable must be buried at a sufficient depth to avoid exposure 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. ESC considers a depth of between 25m and 30m under present foreshore levels to be adequate for the long-term avoidance of cable exposure.</p> <p>Following review of the Applicant's submitted commentary on ESC's LIR <a href="#">[REP2-027]</a>, ESC understands that <i>'the cable will be installed in ducts at 16-25m depth below the nearshore' and 'in ducts at 19-25m depth beneath the foreshore'</i>. The Applicant also identified that <i>'the conceptual HDD design drawing in Application Document 7.3 Design Development Report – Appendix A Landfall</i></p>	<p>ESC has reviewed Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note <a href="#">[APP-321]</a> and is satisfied that the drawing shows a 25m coverage beneath the beach surface height, which is reasonable and just meets the lower end of ESC's desired depth.</p> <p>However, it is considered that the Applicant has not provided adequate detail regarding the type of mitigation it proposes in the eventuality that cables are exposed on the foreshore (irrespective of how unlikely it deems this to be). ESC requests that further detail of mitigation measures is provided in the Outline Offshore Construction Environmental Management Plan, with further detail able to be approved post-consent through a discharge of Requirement 6. ESC is keen to avoid cable exposures occurring, given the uncertainties of climate change and noting that Thorpeness is</p>	Possible



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<i>HDD Feasibility Technical Note [APP-321]...shows the proposed depths of cable installation’.</i>	<p>widely considered as one of the most rapidly eroding coastal areas in the UK.</p> <p>ESC would expect the Applicant to share the Final HDD proposed profiles with ESC (as a Coast Risk Management Authority under the Coast Protection Act 1949 and Flood and Water Management Act 2010) for approval as part of the approval of the Offshore and Onshore CEMPs through a discharge of Requirement 6.</p>	
2.02	Post-installation survey reports	<p>See Paragraph 6.1.4.12 of ESC’s LIR [REP1-128]. The Outline Offshore CEMP [APP-339] commits to post-installation survey reporting of the HVDC link, but does not appear to require that these survey reports be provided to ESC, and other relevant stakeholders. ESC requested in Paragraph 6.1.4.12 of its LIR [REP1-128] that the Outline Offshore CEMP be amended to commit the Applicant to giving ESC, along with other relevant stakeholders, sight of post-installation survey reports. ESC notes that the Applicant does not appear to have provided a response on this matter in its comments on ESC’s LIR [REP2-027].</p>	<p>ESC expects that it, along with other relevant stakeholders, are given sight of post-installation survey reports. This should be secured in the Outline Offshore CEMP [APP-339]. Other energy infrastructure projects share this information with ESC as part of the consented monitoring plan. ESC’s Coastal Management Team would take a keen interest in the ultimate depth of cable burial beneath nearshore, foreshore and backshore. ESC would expect the surveys to show the burial of the cable at the depth proposed on the design drawings in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321].</p>	TBC

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
2.03	Risk of frac-out	<p>See Section 6.1.7 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>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). ESC previously raised its concerns that the Outline Construction Environmental Management Plan (OCEMP) Register of Environmental Actions and Commitments (REAC) does not address this risk satisfactorily. Following changes made to the OCEMP REAC <a href="#">[CR1-043]</a>, ESC is now largely satisfied, but requests that ESC is included in mitigation measure B59 of the OCEMP REAC as a stakeholder that will receive copies of plans/notifications, alongside Natural England.</p>	<p>ESC has previously requested that the OCEMP REAC be updated to include appropriate mitigation measures to address its concerns about frac-out. ESC noted that 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 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.</p> <p>Following review of the Applicant's submitted commentary on ESC's LIR <a href="#">[REP2-027]</a>, ESC understands that the potential hydrological impacts of HDD have been assessed, and ESC welcomes amendments made to mitigation measures GH10 and B59 of the OCEMP REAC <a href="#">[CR1-043]</a>.</p> <p>Measure GH10 secures a '<i>drilling fluid management plan, that includes drilling fluid breakout mitigation measures</i>'.</p>	Likely

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>Measure B59 commits to engagement with Natural England, including via sharing the Plan with them for information. As previously stated, ESC considers engagement with relevant stakeholders essential in the event of frac outs to manage impacts. ESC therefore welcomes the commitment to engage with Natural England, but requests that mitigation measure B59 is amended to include ESC, alongside Natural England, as a stakeholder to receive copies of plans/notifications in relation to the trenchless landfall works. If this amendment is made, ESC will be satisfied that the risk of frac-out has been adequately acknowledged by the Applicant, and suitable mitigation measures have been proposed, and will therefore be content to consider this matter resolved.</p> <p>ESC also wishes to reiterate the importance of engagement with the Environment Agency and RSPB where appropriate, and welcomes the Applicant stating that these stakeholders will be engaged where required in its comments on ESC's LIR [<a href="#">REP2-027</a>].</p> <p>ESC also notes that from the Applicant's comments on its LIR [<a href="#">REP2-027</a>] that <i>'the project is committed to a trenchless installation for the landfall at Suffolk'</i>. ESC supports this commitment.</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
2.04	Access to the landfall	<p>See Section 6.1.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC defers all highway and traffic matters to SCC as the Local Highway Authority. ESC does, however, wish to note its concern that access to the landfall area by large vehicles is very limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular tourist seaside destinations, and ESC is concerned about the difficulties of large vehicles using the A1094/B1122 roundabout at the entrance to Aldeburgh, which was considered in the SPR examinations. Consideration must also be given to potential impacts on the tourism industry resulting from landfall access and associated activities.</p>	<p>ESC requests that comprehensive information is provided in relation to access to the landfall area between Aldeburgh and Thorpeness, and consideration must also be given to potential impacts on the tourism industry resulting from landfall access and associated activities. Given that the Sea Link project proposes a landfall directly adjacent to the B1122, ESC recommends that NGET revisits the constraints pertaining to the proposed use of narrow roads, as highlighted in the SPR examinations, and limits HGV movements as far as practicable, putting the lessons learned from the SPR projects into practice for Sea Link. ESC expects such controls to be contained within the Outline Construction Traffic Management Plan (OCTMP). ESC's position remains unchanged at Deadline 3. The Applicant has stated in its comments on ESC's LIR <a href="#">[REP2-027]</a> that construction traffic through Aldeburgh will be limited to 10 HGVs daily. ESC requests that the Applicant identify where this commitment is secured, as ESC cannot find reference to this constraint in the OCTMP or OCEMP REAC.</p>	TBC



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
2.05	Noise and vibration	<p>ESC raised concerns in its initial PADSS submitted to the ExA in August 2025 regarding the western end of the landfall and cabling corridor being in close proximity to residential properties. There is potential for noise and vibration disturbance resulting from landfall activities, and ESC stated that this must be fully considered and assessed in relation to nearby residential properties and where appropriate mitigated.</p> <p>ESC is satisfied with the Applicant's assessment of impacts at the landfall and therefore does not consider that this matter requires a separate line in this PADSS. ESC's concerns regarding the mitigation of construction impacts discussed in rows 9.01-9.03 of this PADSS table apply to the project as a whole, including noise and vibration impacts at the landfall site.</p>	<p>ESC previously requested that noise and vibration disturbance to residential receptors near landfall is fully considered and mitigated. ESC is satisfied with the Applicant's assessment of noise and vibration effects at the landfall site. It remains concerned about the Applicant's approach to mitigation, but these concerns are laid out more fully in rows 9.01-9.03 of this PADSS table.</p> <p>Therefore, as ESC's disagreement with the Applicant in relation to noise and vibration mitigation are project-wide, ESC does not consider it useful to the ExA for noise and vibration at the landfall to be given its own row in this PADSS table. This matter is therefore not 'resolved', but will not appear in the PADSS table submitted at future deadlines.</p>	N/A
<b>Saxmundham Converter Station and River Fromus Crossing</b>				
3.01	Heritage impacts – general	<p>See Section 6.3.6 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>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.</p> <p>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.</p>	<p>Whilst ESC appreciates the need for compliance with the Water Framework Directive, ESC requires that the scale of the bridge is minimised to mitigate impacts introduced on nearby heritage assets.</p> <p>The height of the bridge will affect the visual impact of the bridge and retaining walls, as well as the size of the required ramps and bunding. The residual visual impact of the bridge itself will be limited following the establishment of the</p>	<p>Possible that preferred 4m bridge option will be selected, but agreement on acceptability of the River Fromus Crossing is highly unlikely</p>

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<p>The movement of the River Fromus Crossing 40m north along the river will make it more prominent in views towards these heritage assets, and the Saxmundham Conservation Area. The mitigation planting around the bridge and access where there are currently open views towards those assets may obstruct these views and affect their significance.</p>	<p>landscape mitigation planting, however the scale and height of the new landscaping will differ depending on the required ground levels around the bridge. This landscaping and the changes to the ground levels are unrelated to the historic form and layout of the former parkland to Hurts Hall and will be intrusive in views toward Hurts Hall. They will also (to a lesser extent) be intrusive in the landscape setting to Saxmundham Conservation Area.</p> <p>Regardless of the height of the bridge, this part of the development is considered to detract from the setting of Hurts Hall and from the setting of the Saxmundham Conservation Area. To minimise the visual intrusion in views to these heritage assets, the height of the bridge, and consequently the size of the ramps, should be minimised. ESC therefore considers that the lowest bridge option would be preferable.</p> <p>Although the significant adverse heritage effects will be reduced if the preferred 4m bridge height option is selected by the Applicant, there will remain a significant adverse effect to be carried forward into the planning balance. ESC's view that this aspect of the scheme is unacceptable is therefore very unlikely to be resolved.</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
3.02	Impacts on designated heritage assets	<p>See Section 6.3.6 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC disagrees with the Applicant's assessment of impacts and effects on designated heritage assets.</p> <p>ESC considers that the landscape planting to mitigate the harm to Hurts Hall would not reduce the magnitude of the adverse impact, and so the residual effect would be moderate adverse (significant).</p> <p>For Hill Farmhouse, ESC disagrees that there would be no impact, and instead considers that there would be a moderate adverse (significant) effect on Hill Farmhouse.</p>	<p>ESC requests that the Applicant reconsiders its assessment of heritage impacts on Hurts Hall and Hill Farmhouse, taking into account the Landscape Viewpoints – particularly Updated Landscape Viewpoint 2 <a href="#">[REP1-298]</a> and Additional River Fromus Viewpoint B <a href="#">[REP1-300]</a> for Hurts Hall, and Landscape Viewpoint 5 <a href="#">[APP-209]</a> for Hill Farmhouse.</p> <p>ESC has reviewed the Applicant's comments on its LIR <a href="#">[REP2-027]</a> and disagrees with the statement at Section 6.3.6.9 that "views of the asset [Hill Farmhouse] in the surrounding landscape are not a feature of its setting that contributes to significance". As a historic farmhouse, the rural agricultural setting of the listed building contributes to the historic interest of the building, and the development would detract from this setting.</p> <p>Plate A.1 in Appendix 1 to the Applicant's comments <a href="#">[REP2-027]</a> is also useful as it shows that the trees to the north of Hill Farmhouse are not a dense woodland, especially in winter.</p> <p>In relation to the Applicant's comment at Section 6.3.6.10 of <a href="#">[REP2-027]</a>, ESC does not disagree with the statement that the Cultural Heritage Viewpoints are most relevant to the heritage assessment, however ESC retains the view that</p>	TBC

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>the Landscape Viewpoints are also important, as they demonstrate that Hurts Hall is widely visible in the surrounding area, which is an aspect of its setting that contributes to its significance.</p> <p>ESC notes the Applicant's comments, but considers the disagreement regarding the impact on Hurts Hall and Hill Farmhouse is not resolved.</p>	
3.03	Landscape and visual impacts	<p>See Paragraph 6.3.11.7 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>The removal of vegetation to facilitate the construction of the bridge will open up views toward the converter station site and increase the focus towards this activity. These impacts have been exacerbated by the increase in scale of the bridge proposed in response to concerns from the Environment Agency regarding impacts on aquatic invertebrates and compliance with the Water Framework Directive. This construction activity would be within a parkland landscape, which is of a special quality and a feature of the Fromus Valley Landscape Character Area.</p>	ESC is now satisfied that the removal of the willow trees along the Fromus will not open up views to the converter station to any significant extent. ESC therefore no longer wishes to pursue this point.	Matter closed
3.04	Landscape planting	<p>See Section 6.3.8 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>New planting around the Converter Station will be a necessary addition to local green infrastructure and wildlife connectivity. ESC expects the Applicant 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. Provision should represent the maximum possible given the national significance and scale of this Project which contrasts with the introduction of local community</p>	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. ESC acknowledges that a commitment to adaptive management has been	Unlikely



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<p>impacts (i.e. national benefits, local impacts). This justifies an over and above 'exemplar' provision of mitigation planting.</p> <p>ESC largely agrees with the conclusions presented in Tables 1.11 and 1.12 of <a href="#">[APP-048]</a>, with the following exceptions:</p> <ul style="list-style-type: none"> <li>• VP1: Could be better mitigated with the addition of additional screening along the length of the PRoW running south from the B1119 towards the site as illustrated by additional tree planting area B in Fig.2 within <a href="#">[REP1-128]</a>;</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>included in the Outline Landscape and Ecological Management Plan (OLEMP) <a href="#">[CR1-045]</a>.</p> <p>ESC will also expect the Applicant to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. ESC acknowledges that the OLEMP <a href="#">[CR1-045]</a> contains a commitment at Paragraph 5.8.1 to advanced planting in the first available planting season prior to construction commencing where planting areas do not conflict with construction compounds and activities. ESC is satisfied with the OLEMP wording committing the Applicant to undertake early planting, with further detail able to be dealt with via the detailed LEMP to be submitted to ESC for approval for a discharge of Requirement 6, should the project be granted development consent.</p> <p>ESC is therefore satisfied with the Applicant's commitments to early planting and an adaptive landscape maintenance programme, and considers these matters to be resolved.</p> <p>ESC considers that additional landscape planting areas could have been included which would have achieved enhanced screening at key viewpoints including Viewpoint 1 and viewpoints along the B1119. ESC has suggested three areas of additional planting (see Figure 2 of ESC's LIR</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p><a href="#">[REP1-128]</a>) that it considers would achieve this enhanced screening.</p> <p>ESC has reviewed the Applicant's response to ESC's LIR <a href="#">[REP2-027]</a>.</p> <p>With regards to Area A in Figure 2 of <a href="#">[REP1-128]</a>, ESC agrees with the Applicant's assertion that <i>"additional mitigation planting in location 'A', would result in adverse cultural heritage effects'</i>. Such an addition would change the historic setting of Hurts Hall. ESC notes that the introduction of landscaping for screening can in itself have a negative impact on the setting of listed buildings, because it changes its character or blocks views. Hurts Hall Park no longer has many parkland features, but the eastern edge between the park and Wood Farm still has the general shape of treelines visible on historic maps, which is valuable. ESC is therefore satisfied that its suggestion for additional mitigation planting in area A in Figure 2 of <a href="#">[REP1-128]</a> no longer needs to be pursued.</p> <p>The Applicant states that additional planting in Area B shown on Figure 2 of ESC's LIR <a href="#">[REP1-128]</a> <i>'would entirely enclose views along the existing Public Right of Way (PRoW) and restrict views to the wider landscape'</i> <a href="#">[REP2-027]</a>. Whilst ESC acknowledges this argument, it would welcome</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>the views of SCC, as the local highway authority responsible for Suffolk's PRow network, on this matter. It is noted that SCC stated in its Deadline 2 submission <a href="#">[REP2-062]</a> that it '<i>fully supports</i>' ESC's proposed areas for additional planting around the converter station site. Should SCC share NGET's concerns regarding the impacts of additional planting area B on users of the PRow, ESC would be content to no longer pursue this matter.</p> <p>However, ESC continues to request that the Applicant considers additional planting in Area C of Figure 2 of ESC's LIR <a href="#">[REP1-128]</a>, now being even more important given the removal of area A. ESC considers the Applicant's justification for dismissing Area C inadequate. ESC disagrees that the planting proposals from the Applicant are "adequate", and ESC requires further evidence demonstrating that multi-species tree belts cannot be accommodated along the B1119, whilst still retaining sufficient space for future projects. It should also be noted that the area north of the converter station site is at a relatively high elevation in the District compared to the converter station site itself, effectively presenting receptors with views down and across the field towards the converter station site and associated works, hence the new development will be both very visible and intrusive. This location demands</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>comprehensive landscaping which ESC suggests should comprise intensive tree cover.</p> <p>ESC also requests that the Year 15 assessment for Viewpoint 21 is reconsidered by the Applicant. In Section 6.3.8.4 of its comments on ESC's LIR <a href="#">[REP2-027]</a>, the Applicant states that 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. As stated in Paragraph 7.1.4 of ESC's LIR <a href="#">[REP1-128]</a>, realistic anticipated growth rates for new planting in East Suffolk are an essential factor informing the Landscape and Visual Assessment. ESC maintains that erratic and unpredictable rain fall patterns can be a very limiting factor in successfully establishing new tree and shrub planting in this region. ESC considers that the Year 15 assessment for Viewpoint 21 should be revised to be a major adverse effect, as unless the mitigation planting establishes very quickly, ESC does not consider that it will lessen the effect to moderate adverse by Year 15.</p> <p>For Viewpoint 5, ESC noted in Paragraph 6.3.8.4 of its LIR <a href="#">[REP1-128]</a> that it considers that more mitigation planting could have achieved enhanced screening of this viewpoint. ESC acknowledges that there are limited opportunities given the area</p>	



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>of land available, but considers that the Applicant could have included more land within the Order Limits to allow for planting closer to the receptor. This would have achieved enhanced screening compared to only planting around the converter station itself. ESC accepts that the Applicant is unlikely to amend the Order Limits to address this at this stage.</p> <p>For Viewpoint 20, again, ESC noted in its LIR <a href="#">[REP1-128]</a> that it considers that more mitigation planting could have achieved enhanced screening of this viewpoint. ESC acknowledges that there are limited opportunities given the area of land available, and that planting near the receptor would block views towards Hurts Hall. Therefore, this is not a matter that ESC wishes to pursue.</p>	
3.05	Assessment of trees and hedgerows near the River Fromus Crossing	A new edition of BS 5837 Trees in Relation to Design, Demolition and Construction is due to be published in the near future (at the time of writing (January 2026) the new BS has not been published – this is expected in 2025 following the earlier consultation which closed in October 2024). This has significantly greater protection recommendations for Veteran and Ancient trees, and could create a potentially unsurmountable constraint for the Crossing. 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. This will be particularly relevant to the Veteran Horse Chestnut	<p>Previously, ESC advised the ExA that it expects the Applicant to re-submit all tree survey information in compliance with the new BS 5837 guidance once it has been published. This was expected within the examination period; however ESC now understands that this revised guidance will be published in November 2026 as set out within 6.2.2.2 of <a href="#">[REP2-027]</a>.</p> <p>ESC understands that any revised assessment will not be possible within the examination period as</p>	Matter closed

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<p>(T871S) which stands close to the Fromus crossing point and which the Council considers may have been under assessed in terms of its cumulative stem diameter, given its multi-stemmed layered form.</p> <p>ESC will expect all tree survey information to be re-submitted according to the new guidance.</p> <p>It should be noted that prior to submission, ESC had not seen any detailed tree survey and Arboricultural Impact Assessment information, including what other important trees could be lost as a result of efforts to avoid the Horse Chestnut.</p>	this closes prior to the revised guidance being published. This matter is therefore closed.	
3.06	Impacts on woodland vegetation	The removal of the mature woodland vegetation along a section of the River Fromus will alter the vegetation network. There are significant concerns in the community – which are shared by ESC – about the potential loss of veteran trees and ancient woodland.	Veteran trees along the River Fromus have been avoided. The veteran Horse Chestnut is being given a 40m wide berth and other veteran trees near the Fromus crossing have been avoided and will be protected during construction. ESC's former concerns on this matter have been addressed. ESC no longer wishes to pursue this matter.	Matter closed
3.07	Design	<p>See Paragraph 6.3.11.5 of ESC's LIR [<a href="#">REP1-128</a>], and ESC's response to Question 1GEN47 of ExQ1, submitted at Deadline 3.</p> <p>The need for the DCO to include an appropriate consenting mechanism to secure the most appropriate bridge design, including genuine engagement with key stakeholders.</p>	As discussed in ESC's response to Question 1GEN47 of ExQ1, ESC requires that comprehensive and detailed provision is included within the DCO, via a Requirement, to ensure that the proposed Fromus Bridge design is submitted to and approved by ESC's Design team (in consultation with relevant stakeholders such as the relevant Highways Authority) before any works on the bridge can be commenced.	TBC

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
3.08	Operational noise	<p>See Section 6.3.7 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>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. The Applicant has not, at present, proposed operational noise rating levels for noise sensitive receptors near the converter station site, nor an operational noise limit DCO requirement. It is worth noting that East Anglia ONE North (EA1N) and East Anglia TWO (EA2) committed to 31 dBA and 32 dBA noise rating levels at the three Noise Sensitive Receptors closest to the Friston substation site (see Requirement 27 of the EA1N and EA2 DCOs). This demonstrates that ESC's request for the Sea Link Applicant to propose operational noise rating levels for noise sensitive receptors near the converter station site prior to the detailed design stage is precedented and not unreasonable.</p> <p>The co-location of the converter station site with LionLink and a possible third project makes it even more important that the lowest possible operational noise rating level is committed to. This will help to prevent unacceptable noise creep, ensuring that noise levels are not sequentially and cumulatively increased significantly whilst being accepted under policy due to the individually less significant increase, thus helping to protect the residents and acoustic character of the area.</p> <p>Following review of the Applicant's submitted commentary on ESC's LIR <a href="#">[REP2-027]</a>, ESC notes that the Applicant is proposing a</p>	<p>ESC requests that appropriate noise rating levels are 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. At least 5dB below background should be the target, if this is not possible then the Applicant needs to propose an operational noise rating level that is the lowest that can reasonably be achieved with full justification as to why that is the case. Even with rating levels agreed, ESC will expect a commitment to go lower, if possible, in the final detailed design.</p> <p>Following review of the Applicant's submitted commentary on ESC's LIR <a href="#">[REP2-027]</a>, ESC notes that the Applicant <i>'acknowledges the comment raised'</i> by ESC on the need for operational noise rating levels and an operational noise limit requirement, and that a <i>'further detailed response will be provided at a later deadline'</i>.</p> <p>Regarding ESC's concerns about noise creep, particularly if the noise rating level is expressed as a LOAEL, the Applicant states in its comments on ESC's LIR <a href="#">[REP2-027]</a> that it <i>'considers that the ≤34 dBA noise rating level threshold should apply cumulatively to this Project and future projects'</i>. ESC is not aware of a mechanism that could place a noise rating level on the site as a whole, making</p>	TBC once the Applicant has provided a detailed response at a later deadline

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<p>noise rating level of <math>\leq 34</math> dBA as the Lowest Observable Adverse Effect Level (LOAEL) for the converter station site, meaning that operational noise levels would not necessarily be kept at or below this level. ESC queries how this 34 dBA level has been determined to be a reasonable level, noting that the agreed night time representative background sound levels are low (the lowest being 20 dBA). Previous projects have used BS4142 significance levels as a basis of determining the LOAEL and the Significant Observable Adverse Effect Level (SOAEL), with <math>&gt;5</math> dB indicating an adverse effect and <math>&gt;10</math> dB indicating a significant adverse effect. On this basis, the Applicant's stated rating level is firmly in the significant adverse effect category. ESC is particularly concerned about the proposed noise rating level of <math>\leq 34</math> dBA in the context of its concerns about noise creep at the co-located site. Furthermore, as a LOAEL this will only require projects to mitigate and minimise impact and allow projects, including Sea Link, to exceed this level, therefore any noise limit should be expressed as the SOAEL and avoided in line with policy. A noise rating level expressed as a LOAEL would not provide adequate protection against this noise creep.</p> <p>If the applicant is using Absolute levels to determine the operational noise limit it should be explained as to why this is as or more protective in terms of impact to Noise Sensitive Receptors as it does not generally take into account any acoustic penalties that a rating would. Given the types of plant to be used, tonality, impulsivity and intermittency are all likely to be considerations. Again, any operational noise limit should be expressed in the form of a SOAEL and represent the level that will not be exceeded and therefore the actual practical operational</p>	<p>it a site constraint which future projects (one of which (LionLink) is only in the pre-application stage of the DCO process, and the other of which is not yet known) would have to conform to. Whilst ESC would very much welcome a discussion of the principle of this and considers it may be worth exploring, ESC requests further information regarding how this would work in practice. ESC is particularly sceptical of the Applicant's suggestion that this rating level could be applied cumulatively to all projects at the site given it has emphasised throughout <a href="#">[REP2-027]</a> (for example in Section 3.0.4) that NGET and NGV are '<i>legally separate entities</i>' and that they have '<i>no influence or control over the decisions made</i>' by one another.</p>	



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		noise limit and not the level at which it will be mitigated and minimised.		
3.09	The use of Benhall Railway Bridge on the B1121 for access to the converter station site, including construction of an overbridge.	<p>See Paragraph 6.3.11.12 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>ESC has concerns regarding the proposed use of Benhall Railway Bridge for access to the converter station site. The bridge has a weight restriction of approximately 46 tonnes, and so the Applicant has proposed to construct an overbridge for Abnormal Indivisible Load (AIL) movements.</p> <p>ESC largely defers to Suffolk County Council as the Local Highway Authority, but wishes to note its concerns regarding the lack of certainty in relation to the disruption created for the community by the works.</p>	ESC defers to SCC but will expect to be fully consulted on this element on the Project considering the genuine concerns of the local community as well as the practicality.	ESC defers to SCC's judgement regarding the likelihood of resolution – subject to the caveat sounded.
3.10	Surface water drainage and flood risk	It is essential that surface water drainage and flood risk at the site is comprehensively and appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. The Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation, and the ExA should satisfy themselves that this is indeed the case.	Whilst supporting their concerns, ESC defers to SCC as Lead Local Flood Authority and so does not consider it necessary for this matter to be included in ESC's PADSS moving forward.	Matter closed – ESC defers to SCC's judgement regarding the likelihood of resolution

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
3.11	Assessment of alternative access options for the converter station site	<p>See Paragraph 6.3.11.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>The proposed Fromus crossing on the currently proposed western access route remains a concern for ESC as it will require significant intrusive engineering and design work.</p> <p>ESC considers that robust justification is required for ruling out the alternative accesses.</p>	<p>ESC previously requested that the Applicant provide an options appraisal report detailing the alternative options for access to the converter station site that were considered, and justification for selection of the western River Fromus Crossing as the preferred access into the co-located converter station site.</p> <p>ESC has reviewed the Applicant's comments on its LIR <a href="#">[REP2-027]</a> together with the Applicant's access assessment summary for the Main Alternatives Considered within Part 1 Introduction Chapter 3 <a href="#">[APP-044]</a>. Noting ESC's concerns, it is acknowledged that the Western Access represents the 'least-worst' option assessed, noting that none of the Applicant's proposed access options were free of constraints. Given the current stage of the DCO examination, the dialogue undertaken to date between ESC and the Applicant on this matter, and noting the works already undertaken which now focus on the western access option, ESC considers it holds little merit pursuing the issue any further given the many other pressing areas of disagreement which require a resolution as set out in this PADSS. This matter is therefore closed as no desirable alternative for converter station site access is available.</p>	Matter closed

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
<b>Land for mitigation</b>				
4.01	Reductions applied to the proposed order limits over the pre-application stage	<p>See Paragraph 6.3.8.9 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC is concerned about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119.</p> <p>The ExA has accepted the Applicant's Change Request Consultation Report <a href="#">[CR1-069]</a>. ESC understands that the Applicant will be widening the strip of land south of the B1119 (north of the converter station site). This is intended to provide additional space to plant the proposed new hedge and subsequently maintain the hedge and ditch, but ESC notes that additional mitigation planting is not proposed.</p>	<p>As discussed in 3.04 above, ESC considers that wholesale revisions to the B1119 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. The Applicant has responded to this request in its comments on ESC's LIR <a href="#">[REP2-027]</a>, stating that <i>'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'</i>. ESC considers the Applicant's justification is inadequate as it stands, as it is stated that the approach is <i>'proportionate and reflects the need to provide sufficient space for co-location of other projects'</i>, but no evidence is provided to demonstrate that additional planting cannot be accommodated along the B1119, whilst still retaining sufficient space for future projects. ESC maintains its view that mitigation planting along the B1119 requires enhancement, and considers it unlikely that this</p>	Unlikely

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			matter will be resolved over the course of the Examination. This is discussed in more detail in 3.04 above.	
4.02	Discrepancies in the order limits with those of SPR	<p>See Section 6.5.5 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>There are discrepancies between the Project's Order Limits around Friston when compared to the Order Limits consented by SPR, including the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed should Sea Link deliver Friston substation under the project alone Scenario 2.</p>	<p>ESC previously requested that the Applicant provides evidence that the proposed Order Limits around Friston substation are adequate for the necessary mitigation measures for Sea Link, in light of the mitigations already secured for SPR as part of their own DCOs for EA1N and EA2. The Applicant should be using the SPR consents as the starting point for their own proposed embedded mitigation under a Scenario 2 connection, especially given the sensitivity of the location and its local communities.</p> <p>ESC welcomes the Applicant updating the Works Plans <a href="#">[CR1-007]</a> so that they clearly identify where drainage works are proposed. Given that the requested further detail has been provided, ESC defers to SCC as the LLFA regarding the adequacy of the proposed drainage areas, and considers this matter between ESC and the Applicant closed.</p>	Matter closed – ESC defers to SCC LLFA regarding the adequacy of the areas identified for drainage on the updated Works Plans
<b>Construction Working Hours</b>				

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
5.01	Core working hours	<p>See Section 7.4.2 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>The proposed 7 days a week working are considered unacceptable by ESC. This is due to significant concerns regarding the lack of respite impacting local residents' mental health and wellbeing (particularly given the number of projects in the district), impacts on socio-economic activity and East Suffolk's tourism industry, and noise and vibration impacts in a noise sensitive area. ESC rejects the Applicant's suggestion in its comments on ESC's LIR <a href="#">[REP2-027]</a> that the identification of Sea Link as critical for the achievement of the Clean Power 2030 target justifies the unacceptable disruption and lack of respite for East Suffolk's communities that would be caused by the proposed working hours.</p> <p>In addition, operations allowed outside the core working hours as proposed in the draft Requirements of the DCO are too wide in scope as they effectively allow working to continue outside core working hours, and could have impacts in terms of noise and vibration, dust, light and other environmental impacts. The Applicant suggests that the list of exceptions to working hours in the DCO is comparable to those for EA1N and EA2 <a href="#">[REP2-027]</a>. ESC disagrees and maintains its view that the scope of exceptions to the core working hours is too broad in the Sea Link draft DCO <a href="#">[CR1-027]</a>.</p>	<p>ESC requires the Applicant to remove Saturday afternoons, Sundays and Bank Holidays from the core working hours in the DCO, to align with the working hours previously examined and agreed for other associated and consented NSIPs, namely SPR's EA1N/EA2 consents. These projects share aspects of the Sea Link infrastructure at Friston and have additional overlap in geospatial terms, together with a similar landfall area. Operations outside of core working hours must be restricted unless otherwise approved by ESC as responsible local planning authority. ESC will not support the currently proposed working hours.</p> <p>ESC notes that other NSIPs in East Suffolk have mechanisms to request working outside of permitted hours. ESC will always support this 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 Best Practicable Means, 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. ESC does not consider the Applicant's justification for not pursuing this approach in its comments on ESC's LIR <a href="#">[REP2-027]</a> satisfactory.</p>	Possible, but currently a significant area of disagreement

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
5.02	Working hours - coordination	<p>See Section 7.4.2 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>The Applicant suggests that longer working hours will result in the Project's construction being completed sooner. Whilst ESC appreciates that there is a balance to be struck, considering the construction impacts of other projects, and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant if all are consented. Therefore, respite in these extended durations must be given full consideration. Given all other comparable projects provide this respite (including projects promoted by SPR), ESC considers it entirely inappropriate to now start including these periods and creating impact at times where ESC and other projects have deliberately prevented it, particularly given the spatial relationship between SPR's projects and the proposed Sea Link project.</p> <p>The Applicant also states in its comments on ESC's LIR <a href="#">[REP2-027]</a> that a shorter construction phase would allow for greater colocation and cooperation between projects. ESC would request further explanation of this assertion from the Applicant as it is unclear how this conclusion has been reached.</p>	As above, ESC requires the Applicant to remove Saturday afternoons, Sundays and Bank Holidays from the core working hours, and thereby following the approach that was taken in SPR's EA1N/EA2 consents. ESC will not support the currently proposed working hours.	Possible, but currently a significant area of disagreement

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
<b>Friston substation</b>				
6.01	Historic Surface Water Flooding	<p>See Section 6.5.5 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>Friston has been subject to surface water flooding on multiple occasions, and so it is important that there is sufficient space on site to accommodate a suitable and acceptable construction drainage design. Understanding the implications of the operational drainage design for the Project and its interaction with the drainage proposals consented under the East Anglia ONE North and East Anglia TWO projects is also extremely important. ESC defers to the LLFA and Environment Agency (EA) on flood matters.</p>	ESC defers to SCC as the LLFA and the EA, and supports their concerns. ESC therefore does not consider it necessary for this matter to be retained in future versions of its PADSS.	Matter closed – ESC defers to SCC and the EA for their judgement regarding the likelihood of resolution.
6.02	Legacy benefits associated with reduction in flood risk	<p>See Section 6.5.5 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>If the Project is consented, ESC strongly suggests that reducing existing and known flooding issues in the village of Friston presents a hugely beneficial legacy project opportunity.</p> <p>However, any such legacy benefit would need to be balanced against any other impacts introduced by the Project.</p>	ESC requests that the Applicant assesses the possibility of a legacy project to improve flooding issues in the village of Friston. The existing watercourse in proximity to the substations area and village experiences well-known and regular problems due to silting and lack of maintenance. This presents an opportunity for the Applicant and other project promoters to plan and implement a solution benefiting the local community over and above the needs of the NSIP projects within the area.	Unknown



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>ESC accepts that the wider watercourse maintenance issue extends beyond the order limits for the project. ESC has raised this matter more than once with the Applicant in project meetings (and with NGV regarding LionLink) as it presents a valuable opportunity for developers to implement a much-needed legacy benefit within the village of Friston.</p> <p>The Applicant had the opportunity to avail itself of this opportunity but has not done so and now relies on the Order limits which it identified and selected.</p>	
6.03	Operational noise	<p>See Section 6.5.6 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>ESC notes that the Applicant has scoped operational noise of the proposed Friston Substation out from assessment in the ES. The Applicant states in Part 2 Suffolk Chapter 9 Noise and Vibration (Version B) [<a href="#">AS-109</a>] that <i>'although potential operational noise from the Friston substation was originally proposed to be included in the scope of the ES...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)'</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 further or different equipment will not impact that constraint.</p>	<p>The Applicant stated in its comments on ESC's LIR [<a href="#">REP2-027</a>] that it has noted these points, but no further justification was provided, nor were any suggestions to address ESC's concerns made. ESC requests that the Applicant provides evidence demonstrating that the additional infrastructure required to connect into Friston substation will not result in the site rating level at the site being exceeded.</p>	Likely

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
<b>Project-wide: Socio-economics, leisure and tourism</b>				
7.01	Baseline conditions and request for ongoing monitoring	<p>See Section 7.8.3, 7.8.4 and 7.8.6 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <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>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 construction over the next decade.</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>The impacts resulting from the many major infrastructure developments facing East Suffolk 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. 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>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 and workforce projections during the construction phase of the project. This would also support proactive planning for worst-case scenarios, particularly those arising from the overlapping peak construction phases of Sea Link, Sizewell C, and other major developments that may collectively impact local socio-economic, recreational and tourism assets.</li> </ol> <p>With regards to the first of ESC's requests, the Applicant has stated in its comments on ESC's LIR <a href="#">[REP2-027]</a> that Section 10.7 of Part 2 Suffolk Chapter 10 Socio-economics, Recreation and</p>	Possible

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			<p>Tourism <a href="#">[REP1A-005]</a> defines a future baseline, incorporating projected demographic trends and planned development land.</p> <p>ESC considers that this future baseline cannot be relied upon. Given the number and scale of energy NSIPs and other major developments either being constructed or planned for construction in East Suffolk, ESC is strongly of the view that a review of the baseline conditions is needed prior to construction commencing to ensure that the predicted 'future baseline' is accurate.</p> <p>In relation to ESC's second request for ongoing monitoring and reporting of socioeconomic conditions during the construction phase, the Applicant has stated in its comments on ESC's LIR <a href="#">[REP2-027]</a> that it will consider this proposal and respond in due course. ESC looks forward to engaging further with the Applicant on this matter once a response to ESC's request has been received.</p>	
7.02	Assessment methodology	<p>See Section 7.8.7 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC strongly disagrees with the Applicant's conclusions 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>ESC requests that the Applicant re-considers its assessment and the conclusions drawn.</p> <p>East Suffolk's visitor economy needs to be recognised as a complex system, where the success of the whole is greater than the sum of its individual parts. Adverse impacts on one part of</p>	Unlikely

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
		<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.</p> <p>ESC considers that the combination of impacts resulting from the Suffolk Onshore Scheme and other developments in East Suffolk would have significant effects on visitor perception and experience, resulting in a reduction in repeat tourism, long-term reputational damage, and economic decline.</p>	<p>the system can adversely affect others, potentially causing detrimental system-wide effects on this important economic sector.</p> <p>In the case of the visitor economy, the impacts of the Suffolk Onshore Scheme on individual receptors should not be measured in isolation, and without consideration of the wider effects on the visitor economy. The receptors, or factors, are interdependent and collectively contribute towards a successful visitor economy. These include a mix of tangible assets such as local infrastructure, attractions, accommodation, and amenities; as well as intangible assets such as the perception and reputation of a destination; all of which contribute to the overall visitor experience. Collectively, these factors are indicators of system health and should be measured and evaluated during the construction period, and into the operational period. ESC recommends a broader and more comprehensive approach to monitoring impacts on the visitor economy. One that extends research methodologies beyond desk-based assessments and draws on mixed methodologies such as surveys, interviews, and other primary data to understand the key strengths, vulnerabilities, and health of the visitor economy.</p>	

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			ESC acknowledges that the Applicant has stated in its comments on ESC's LIR <a href="#">[REP2-027]</a> that there is <i>'limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism'</i> . ESC maintains its view that the Applicant has failed to recognise the visitor economy as a complex system, and ESC therefore remains concerned about the Applicant's assessment.	
7.03	Potential for beneficial socio-economic impacts	<p>See Section 7.8.9 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <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>ESC welcomes the Applicant's statement in its comments on ESC's LIR <a href="#">[REP2-027]</a> that it is willing to work collaboratively with ESC. ESC acknowledges the Applicant's commitments to <i>'develop and implement a Social Value strategy'</i> and to explore coordination with Sizewell C's</p>	Possible

Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			‘College on the Coast’. ESC requests that further details are provided regarding the aims and contents of this Social Value Strategy, how these commitments will be secured, and how stakeholders will be engaged to assist in developing the Strategy. ESC continues to request an Employment and Skills Plan (or similar), and a Supply Chain Plan for the reasons outlined above, and in its response to ExQ1 1SERT7 submitted at Deadline 3.	
7.04	Impacts on the visitor economy, particularly for coastal communities at the landfall	<p>ESC is concerned that the cumulative impact of Sea Link in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s).</p> <p>There is a high degree of interdependency between visitor destinations, employment, and supply chains within East Suffolk. Visitors move from destination to destination, employees need to access their employment, and the potential for the displacement of visitors during construction should not be ignored. Should this project proceed, it is essential that this impact is appropriately considered, and appropriate mitigation and compensation is provided to support the continued success of the visitor economy.</p>	<p>ESC would expect to see that impacts on individual receptors across the District of East Suffolk, including holiday rentals, tourist accommodation, farms and businesses directly affected by the changes resulting from the cumulative impacts of the Project with other proposed/consented projects in the area, be appropriately mitigated and compensated. ESC requests that these mitigation and compensation measures should be developed in collaboration with ESC and the businesses themselves to maximise the effectiveness of the proposed strategies.</p> <p>Following review of the Applicant’s submitted commentary on ESC’s LIR <a href="#">[REP2-027]</a>, it is apparent that the Applicant and ESC will not agree on the magnitude of anticipated impacts due to be introduced on the coastal communities</p>	Unlikely

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			at the landfall (Thorpeness and Aldeburgh). ESC's position remains unchanged. As explained in the LIR <a href="#">[REP1-128]</a> , the coastal communities in this region have limited access routes in and out and they rely on the visitor/tourism economy. There is no doubt that there will be residual impacts felt on the tourism economy. ESC is concerned that the perception of the area is already changing as evidenced in the first round of open floor hearings i.e. district-wide NSIP construction works are deterring visitors. Each successive NSIP consented in this region will add to this impact. Even before consent is granted, perception of a once popular tourist destination can be altered as visitors don't want to have their fond memories of these locations tainted. ESC holds similar concerns across the rest of the District, especially in the market town of Saxmundham. The Applicant's view that there will be 'no residual significant effects' is therefore not supported by ESC or the local communities it represents.	
<b>Project-wide: Ecology</b>				
8.01	Survey coverage	ESC has previously raised concerns about a lack of survey coverage in relation to Breeding and Wintering Birds.	ESC no longer wishes to pursue its concerns around survey coverage for breeding and wintering birds. Whilst it maintains that the survey effort was inadequate, it is not considered that further surveys would change the outcome of the assessment of significance presented in the	Matter closed



Ref	Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
			Environmental Statement Chapter 2 (Suffolk) Ecology and Biodiversity <a href="#">[REP1-047]</a> .	
8.02	Hazel dormice	<p>See Section 7.2.2 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC is concerned with what it considers to be a lack of survey coverage in relation to Hazel Dormice, and the subsequent impacts.</p>	<p>ESC is pleased to see that the Applicant is now committing to undertaking pre-construction surveys for hazel dormouse. These must be based on the most recent best practice guidance. The Applicant has recognised in its comments on ESC's LIR <a href="#">[REP2-027]</a> that the OLEMP <a href="#">[CR1-045]</a> does not refer to pre-construction surveys for this species being planned, and has now committed to updating the OLEMP to address this. ESC looks forward to commenting on the updated document in due course. With regard to the use of a precautionary method of working to clear the vegetation, this is different to pre-construction surveys and the OLEMP should have been clear that pre-construction surveys were required, followed by precautionary vegetation clearance if no dormice were recorded.</p> <p>Notwithstanding this new commitment to pre-construction surveys, ESC maintains its position that the surveys undertaken to date fall below the standard set by the best practice guidance in place at the time that they were carried out. The Applicant's assertion that this deficiency is immaterial because it was only minor ignores the</p>	TBC

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			<p>point of there being minimum survey effort levels included in best practice guidance – if dropping slightly below the minimum effort wasn't important, then the minimum effort level wouldn't be set where it is. Also, the Applicant's statement that the survey effort in Zone D was only below the minimum amount due to landowner activity is considered to be incorrect. As set out in Paragraph 7.2.2.4 of ESC's LIR [<a href="#">REP1-128</a>], ESC consider that the month in which the nest tubes were put out (October 2023) is also included in the calculation even though they were not installed until the end of the month and therefore were not available for animals to locate and use in that month.</p> <p>ESC also queries the Applicant's assertion in Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Version C) [<a href="#">REP1-047</a>] (referenced in its comments on ESC's LIR [<a href="#">REP2-027</a>]) that there would be a moderate beneficial long-term (significant) impact on dormice due to habitat creation. ESC queries this finding and considers that the proposed landscape planting cannot be of benefit to a species which is claimed by the Applicant to be absent. ESC considers that this benefit should be downgraded to 'negligible' (i.e. 'not significant') if the project maintains that the species is absent from these sites. The</p>	

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			corresponding row of Table 2.11 should also be updated to reflect this.	
8.03	Bats	<p>See Section 7.2.5 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC is concerned that equipment failure during bat surveys has limited the results and resulted in the under-recording of bat species/activity, subsequently resulting in insufficient mitigation measures.</p>	<p>The Applicant's acknowledgement in Section 7.2.5.3 <a href="#">[REP2-027]</a> of bat detector equipment failure is noted. However, ESC maintains that, as set out in Paragraph 7.2.5.7 of its LIR <a href="#">[REP1-128]</a>, survey effort above the minimum requirement in one part of the Order Limits is not a proxy for understanding bat activity in another part of the Order Limits. All it does is add to the amount of bat activity recorded across the whole Order Limits when the results are pooled. The Applicant states in <a href="#">[REP2-027]</a> that the redeployment of detectors in the same month that they failed was often not possible due to notice periods agreed with landowners, however if this was the case then additional months of survey to make up the deficit would have resolved the issue. ESC therefore continues to request that further bat activity surveys are carried out 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</p>	Possible

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			<p>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.</p> <p>ESC maintains its concern set out in Paragraph 7.2.5.6 of its LIR <a href="#">[REP1-128]</a> regarding the practicality and technical feasibility of mitigating every hedgerow crossing as though the hedgerow was important for bats. Whilst it is acknowledged that the Applicant does not consider that this is High Risk, ESC disagrees with this at this time.</p> <p>ESC also notes the Applicant's comment in <a href="#">[REP2-027]</a> Section 7.2.5.4 that Paragraph 2.9.56 of Part 2 Suffolk Chapter 2 Ecology and Biodiversity <a href="#">[REP1-047]</a> considers crossing hedgerows using other techniques including trenchless techniques but that "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." As a point of clarification, it should be</p>	

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			noted that Paragraph 2.9.56 of <a href="#">[REP1-047]</a> does not rule out other crossing methods for ecological reasons, instead it states that other measures would be “impractical due to the need for large construction compounds at either side of any ditch or hedge to send and receive the drill, and the fact that such crossing methods would take significantly longer (given the number of hedges to be traversed) than the open cut trenching method and therefore extend the overall construction programme and duration of disruption.” Ecological considerations do not therefore appear to have formed part of the decision not to use other hedgerow crossing methods, only matters of land use and project programme.	
8.04	Reptiles	<p>See Section 7.2.6 of ESC’s LIR <a href="#">[REP1-128]</a>.</p> <p>ESC considers that trapping and translocation of reptiles from the larger square/rectangular shape of the acid grassland area at the proposed Landfall HDD location (specifically Survey Area B- Land Parcel Reference 152 and 193) is likely to be necessary as “flushing” of animals through vegetation manipulation is likely to be considerably more difficult than in the longer, narrower sections of the cable route. In these larger areas, reptiles are more likely to double back or flee in unintended directions, potentially remaining within the cleared zone. Also, slow worm (which were recorded in this area) unlike other reptile species such as common lizard, grass snake, or adder, are harder to</p>	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. It is noted that ‘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’ ( <a href="#">[REP2-027]</a> Paragraph 7.2.6.1). Whilst ESC agrees that this could be acceptable, the OLEMP will need to be updated to reflect this.	Likely

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		displace though vegetation manipulation alone due to their tendency to burrow deep into vegetation or loose soil when disturbed. Because slow worms tend to shelter in place rather than fleeing, standard vegetation manipulation (such as using a flail or hand trimmer) can be less effective as a mitigation strategy. This behaviour significantly increases the risk of accidental injury or mortality as the animals remain hidden during mechanical clearing operations. We therefore maintain the opinion that trapping and translocation mitigation combined with displacement is likely to be required in areas which are either of a large area or have known slow worm populations.		
8.05	Hedgehog	<p>See Section 7.2.4 of ESC's LIR [<a href="#">REP1-128</a>].</p> <p>The ES concludes that subject to the implementation of the identified mitigation, the development will result in a negligible impact on hedgehog, 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="#">CR1-043</a>] and OLEMP [<a href="#">CR1-045</a>], with final details discharged as part of the LEMP.</p>	ESC requests that measures to protect hedgehogs during construction vegetation clearance are included in the OCEMP REAC [ <a href="#">CR1-043</a> ] and OLEMP [ <a href="#">CR1-045</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. Outside of the hibernation period, inspection of all suitable habitat by an Ecological Clerk of Works prior to any mechanical clearance should be conducted. 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.	Possible

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			ESC acknowledges that the Applicant has stated that it will consider these points at Section 7.2.4.1 of <a href="#">[REP2-027]</a> , and ESC looks forward to commenting on this matter further once the Applicant has provided this additional consideration.	
8.06	Red deer	<p>See Section 7.2.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>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.</p>	<p>ESC requests that the OCEMP REAC <a href="#">[REP1-102]</a> includes a commitment to the Applicant submitting detailed fencing plans for approval as part of the approval of the CEMP through a discharge of DCO Requirement 6.</p> <p>The Applicant has stated in its comments on ESC's LIR <a href="#">[REP2-027]</a> that the OLEMP <a href="#">[AS-059]</a> '<i>does refer to use of deer fencing to protect planting</i>'. ESC considers that this response fails to address the point ESC was making in its LIR. ESC acknowledges that deer fencing is proposed, but is requesting that the OCEMP REAC commits to detailed fencing plans being submitted for approval as part of the LEMP, preventing fencing directing deer towards hazards or trapping them within confined areas. As this is a construction mitigation measure ESC considers that it should form part of the CEMP, not the LEMP which deals with landscape planting mitigation post-construction.</p>	Possible



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8.07	Biodiversity net gain (BNG)	<p>See Section 7.2.7 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC is of the view that more information is needed on how the project is going to achieve its minimum 10% BNG commitment in Suffolk, and how that is going to be secured and monitored in line with National Grid's commitment to managing and maintaining BNG for at least 30 years.</p>	<p>Whilst ESC recognises and supports the Applicant's intention to deliver a minimum of 10% BNG, ESC maintains that further information on the mechanism to secure and achieve this is required as part of the DCO examination as set out in ESC's LIR <a href="#">[REP1-128]</a>, Paragraphs 7.2.7.4 and 7.2.7.5.</p> <p>ESC notes that Sections 7.2.7.4-7.2.7.5 of <a href="#">[REP2-027]</a> include some white hidden text stating that "The Applicant welcomes discussions around a legal agreement securing the delivery of BNG on-site and off-site." Whilst it is unclear why this text was not made visible in the final document, ESC welcomes the Applicant's intention to discuss this matter further and encourages this to happen as soon as possible.</p>	Possible
8.08	Requirement 9 (Reinstatement schemes)	<p>See Paragraph 7.1.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>Requirement 9(2) within the draft DCO (Version E) <a href="#">[CR1-027]</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.</p>	<p>ESC requires this aspect of Requirement 9 to be removed. The Applicant justifies the inclusion of this exemption in its comments on ESC's LIR <a href="#">[REP2-027]</a>, stating that it <i>'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.'</i> Additionally, the Applicant notes that the REAC <a href="#">[CR1-043]</a> Measure GG07 includes a commitment to <i>'hedgerows, fences and walls...[being] reinstated to a similar style and quality to those</i></p>	Possible

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			<p><i>that were removed where possible, with landowner consultation.'</i></p> <p>The assessment set out in the Suffolk Ecology and Biodiversity Chapter (Chapter 2) of the Environmental Statement <a href="#">[REP1-047]</a> (Table 2.10) concludes that residual impacts arising from the development on species such as foraging/commuting bats are reduced to 'Minor Adverse', 'Not Significant' in part following the reinstatement of hedgerows removed as part of the development. However, if there is no certainty that these features will be reinstated - and indeed the drafting of Requirement 9 provides a clear indication that they will not be in full - then ESC considers that these conclusions cannot be relied upon and the project therefore has the potential to result in greater residual ecological impacts than those set out in ES Chapter 2.</p>	
<b>Project-wide: Environmental Protection</b>				
9.01	Construction noise Lowest Observable Adverse Effect Level (LOAEL)	<p>See Paragraph 7.4.4.2 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC considers 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</p>	<p>ESC requests that the LOAEL is amended to accurately reflect the baseline noise environment of the area.</p> <p>In response to concerns raised by ESC in its LIR, the Applicant has stated in <a href="#">[REP2-027]</a> that it agrees that <i>'construction noise may still be audible below this level and may therefore constitute an adverse effect'</i>, but that <i>'the contractor is required</i></p>	Possible

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		that there is no/low impact below this level that is not worthy of mitigation, and this is disingenuous.	<i>to employ best practicable means (BPM) to reduce construction noise and vibration levels for all works irrespective of this threshold'. ESC does not consider that the requirement on contractors to implement BPM should be used as an alternative to determining a meaningful and realistic LOAEL. Setting an appropriate LOAEL is crucial for identifying the point where noise levels may start to have a detrimental impact on people's quality of life. The use of BPM cannot be used as a substitute for setting the LOAEL, but is of course a welcomed mechanism for reducing impacts as far as practicably possible.</i>	
9.02	Temporal restrictions	<p>See Section 7.4.4 of ESC's LIR [<a href="#">REP1-128</a>].</p> <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.</p> <p>The Applicant has attempted to clarify what it means by 'temporal restrictions' 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 threshold 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> </ul>	<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>ESC notes that the Applicant states in [<a href="#">REP2-027</a>] that <i>'temporal restrictions are...a 'catch-all' for potential situations where,</i></p>	Possible

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		<ul style="list-style-type: none"> <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> <p>ESC note that the Applicant refers to the Design Manual For Roads and Bridges in its comments on ESC's LIR <a href="#">[REP2-027]</a>. Whilst accepting this may be potentially useful supplementary guidance in some cases, ESC questions its scope for a project of this sort which is remarkably short of roads and bridges. BS5228 is the relevant guidance and should be the one that informs the assessment and control of impact. 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 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>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</p>	<p><i>despite the use of best practicable means, noise levels may not be able to be kept below the noise level threshold' and 'temporal restrictions would form part of [the] strategy' to 'mitigate and minimise' the potential adverse effect. ESC acknowledges that temporal restrictions can help reduce impacts, however it should be noted that simply stating the noise will not occur all the time does not constitute robust mitigation as adverse impacts may still be encountered during phases of the construction. The temporal restriction argument should therefore not be relied upon to remove predicted significant adverse and adverse effects, as is currently the case in the Applicant's assessment. Temporal restriction is not a "catch all" to avoid significant adverse effects without the support of significant justification. It is noted that exceedance of the significant adverse effect level will be unavoidable at times and this should at least be quantified before being justified given the policy tests in NPS EN-1 regarding significant adverse effects.</i></p> <p>The Applicant's response to Section 7.4.4.10 of ESC's LIR <a href="#">[REP2-027]</a> suggests that the application of the lower 'ABC' weekend thresholds will increase the likelihood of exceedances and therefore the potential for significant effects that the Applicant is then proposing to mitigate</p>	

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		<p>given the reliance on it to remove predicted significant adverse and adverse effects. ESC considers that this is 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>through temporal restrictions. Effectively this means the requested longer working hours will trigger the need for temporal restriction to avoid significant impact.</p> <p>ESC therefore finds the Applicant's reliance on temporal restrictions puzzling. It appears that the Applicant wants to be able to work for the maximum amount of time, but to then restrict working time as their primary source of mitigation to avoid significant adverse effects. ESC considers that these two positions are in direct conflict with one another.</p> <p>The Applicant may suggest that the increased core working hours allow for the inclusion of temporal restrictions, but given many of the predicted significant effects that occur are as a result of the extended working hours, ESC would consider such a justification inadequate.</p> <p>Further to this, the Applicant states in its response to Section 7.4.4.8 of ESC's LIR <a href="#">[REP2-027]</a>:</p> <p><i>"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 necessarily indicate a significant adverse effect). The Applicant agrees, in principle, that situations</i></p>	

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			<p><i>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."</i></p> <p>S.61 absolutely should be used in a situation where a threshold may be exceeded, and an exceedance should only occur when the assessment of "other project specific factors' in BS-5228 'ABC' methodology concludes that this will not result in the significant effect that it has the potential to indicate. S.61 would be a reasonable way to demonstrate this, notwithstanding ESC's current preference for S.61 to be used for all works.</p> <p>This is particularly pertinent here as the project specific factor that is relied significantly upon to prevent the potential significant adverse effect of a threshold exceedance caused by the extended hours is temporal restrictions, again demonstrating the conflict between requesting longer core hours and then mitigating their effect by restricting working time.</p> <p>Paragraph 5.12.17 of NPS EN-1 must also therefore be considered in respect to the viability of granting consent for the project, as the Secretary of State must consider whether the</p>	

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			<p>proposals adequately “avoid significant adverse impacts on health and quality of life from noise”.</p> <p>Whilst much of this discussion considers exceedance of the construction noise threshold and SOAEL in the extended core hours period, it must also be considered for any exceedance of the thresholds where temporal restrictions are used to mitigate a significant adverse effect.</p> <p>The Applicant must be very confident that significant adverse effects can be avoided. ESC currently does not think this has been demonstrated given the reliance on temporal restrictions, particularly given the lack of detail and wide scope of the definition of temporal restrictions provided by the Applicant in its response to the ExA’s s89(3) letter of 5 September 2025 <a href="#">[AS-106]</a>.</p>	
9.03	Noise and vibration mitigation	<p>See Section 7.4.8 of ESC’s LIR <a href="#">[REP1-128]</a>.</p> <p>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. standard expected, and this has been committed to, which is welcomed. However, ESC notes that the Applicant has identified that a number of significant impacts are likely to arise 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</p>	<p>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.</p> <p>The Applicant has stated in <a href="#">[REP2-027]</a> that it is <i>‘confident that significant adverse effects can be avoided at these locations with the implantation of BPM’</i>. They go on to state that <i>‘specific</i></p>	Possible



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		this in all cases along with the specific details of 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.	<i>mitigation measures can only be determined by the contractor, informed by their detailed assessments</i> '. Whilst ESC acknowledges that greater detail would be provided by the contractor pre-construction, should the project be consented, ESC considers that further detail is required at this stage. In any case, non-specific mitigation, and temporal restrictions as discussed in 9.02 above, cannot be relied upon to remove predicted significant adverse effects.	
<b>Project-wide: Lack of coordination</b>				
10.01	Lack of coordination and introduction of cumulative and/or in combination effects	<p>See concerns raised throughout ESC's LIR <a href="#">[REP1-128]</a>, including in Sections 3.0, 5.3, 6.3.2, and 6.4.2.</p> <p>ESC is disappointed by the lack of meaningful engagement by the Applicant with other NSIP promoters locally. This has resulted in opportunities for coordination, including with the proposed LionLink project, being missed, limiting opportunities to minimise and avoid cumulative and in-combination impacts. It is ESC's view that the Project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination between schemes.</p> <p>Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in the East Suffolk region over the next decade have been missed. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects with little regard being paid to the consequential long-lasting damage that so</p>	<p>ESC has had to face and deal with numerous nationally significant energy 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 East Suffolk's environment and communities. The succession of individual proposals impacting East Suffolk's communities without visible strategic over-sight, or collaboration to minimise impacts, creates a very challenging, unsustainable and unacceptable situation.</p> <p>It is imperative, given the pressures this area of East Suffolk is facing from these projects, that the cumulative and in-combination effects of the Project with other proposed and consented</p>	Unlikely

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		<p>much onshore infrastructure proposed within the East Suffolk District is causing and will continue to cause to its local communities and the environment. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken place, nor has any thought been given to mitigating the impacts of delivery of future energy infrastructure in this region. Instead, East Suffolk's local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another whilst being in close proximity, and resulting in cumulative and in-combination impacts that are being forced upon the District. This is unsustainable.</p> <p>ESC is of the view that an opportunity for coordination has been missed by both the Applicant and NGV. If the Applicant laid cable ducts for the other project (such as those for HVAC cables running between the Saxmundham converter station site and the Friston substations site) at the same time as laying the ducts for the Sea Link project, this would meaningfully reduce the significant environmental impacts of both projects.</p>	<p>projects are fully taken into account, considered and all opportunities for coordination identified and maximised. This is necessary and essential so as to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environments and the local communities, who have been hit by a constant barrage of energy infrastructure projects and will be subject to years of disruption from associated construction works, if they are consented and implemented.</p> <p>The Applicant dismisses ESC's concerns in its response to ESC's LIR <a href="#">[REP2-027]</a>, and asserts that coordination has indeed taken place and has '<i>had a profound influence</i>' on the development of the Sea Link project. ESC maintains the points previously raised on this matter. There is virtually no real coordination being proposed between Sea Link and the proposed LionLink project other than colocation at Saxmundham (which in itself is not coordination). This is evident by the missed opportunity for NGET to install cable ducts for LionLink's proposed HVAC links to Friston Kiln Lane. This means that each project, if consented, will need to install its own HVAC cables in isolation, successively, and in the same area. This unnecessarily elongates the construction works period for host and neighbouring local communities and the environment.</p>	

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			<p>ESC requests that the Applicant includes the ability within their DCO to provide the ducting for the LionLink project. Leaving space within the same area of land (i.e. HVAC routing options) is not sufficient and does not amount to meaningful coordination between projects as it still requires two consents and two lots of cable installation disruption in the same area. The benefits of coordination, to significantly reduce environmental impacts, have therefore been missed. Given the likely close alignment of the two projects' HVAC cable swathes in this area, coordination has not been built into the project, and this demonstrates that opportunities for real coordination have been missed.</p>	
10.02	Interaction with offshore wind energy generation	ESC previously raised concerns about the possibility of Sea Link providing the North Falls Offshore Wind Farm project with an offshore electrical connection requiring additional onshore infrastructure at Friston Kiln Lane, within East Suffolk.	<p>The Applicant highlights within <a href="#">[REP2-027]</a> that <i>'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.'</i></p> <p>In light of the points raised within the Applicant's response summarised above, ESC is no longer</p>	Matter closed

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			pursuing this matter as neither the North Falls or Sea Link projects currently include any provision for an offshore interface between the projects (as of the time of writing).	
10.03	Construction Compounds	<p>See Paragraph 6.6.1.2 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC requests that the Applicant seeks to coordinate construction compounds with NGV's LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site.</p>	<p>ESC requests that the Applicant engages with NGV to consult and agree coordination of construction compounds during construction to reduce otherwise unnecessary and entirely avoidable impacts.</p> <p>ESC notes and supports the Applicant's commitment at 6.6.1.2 within <a href="#">[REP2-027]</a>: <i>'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.'</i></p>	Unlikely
10.04	Masterplan for Saxmundham Converter Station site	<p>See Section 6.3.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station site is 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 still achieve long-term</p>	<p>ESC notes and supports the Applicant's commitments set out at 6.3.3.4 within <a href="#">[REP2-027]</a>.</p> <p>ESC requests that the Applicant continues to work in collaboration with other NSIP promoters and other stakeholders to ensure the converter station site continues to be genuinely master-planned in order to achieve long-term good design.</p> <p>ESC welcomes the update noting that <i>'The Sea Link project team has been consulted by the LionLink team on the updated version of the</i></p>	Likely

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		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.	<i>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.'</i>	
10.05	Friston Substation – impact on landscape planting	<p>See Section 6.4.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>There is a risk that the HVAC cable corridor entering the proposed Friston Kiln Lane substation site will reduce the effectiveness of the landscape mitigation consented under East Anglia ONE North and East Anglia TWO's consents if open cut trenching methods of installation are used by Sea Link (and future projects looking to connect at this location). ESC considers it unacceptable for multiple successive projects to come forward which have the potential to diminish and damage that mitigation planting - this situation would be made worse by the project promoters not coordinating cable installation/routes between projects requiring multiple routes into the Friston Kiln Lane substation site.</p> <p>ESC maintains a strong preference for the Applicant to use Horizontal Directional Drilling (HDD) to minimise adverse impacts on this landscape mitigation. ESC understands, however, that NGET are reluctant to use HDD for this purpose. ESC is also concerned that this would subsequently restrict NGV's ability to use HDD methods for the LionLink project in the future, with Sea Link's open cut installation effectively setting a precedent for future works given the current lack of HVAC coordination. This is unacceptable given the damage that could be caused through</p>	<p>ESC requests that the Applicant is strongly encouraged to use HDD to minimise impacts on SPR's landscape mitigation around the Friston Kiln Lane substation. Cutting a swathe of land for HVAC cable corridors through the previously consented landscape mitigation areas surrounding the substations would result in detriment to the previously approved landscape mitigation efforts for the SPR projects, which must be avoided at all costs.</p> <p>ESC does however acknowledge the positive engagement efforts between NGET, NGV and SPR undertaken to date on early discussions related to how HVAC cables will transit consented SPR mitigation areas at Friston Kiln Lane. ESC maintains that HDD is the favourable option for HVAC cable transit in these areas, noting Sea Link's preference is open cut and fill trenching. However, ESC is aware of the ongoing dialogue between parties currently and appreciates that all options are being explored to minimise future disruption at this early stage.</p>	Likely

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		<p>open cut trenching installation methods, if HDD is not used in these areas.</p> <p>ESC notes the Applicant's comments within <a href="#">[REP2-027]</a> in response to its LIR submitted at Deadline 1. Section 6.4.3.5 also highlights that <i>'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.'</i> This is a welcome addition from the Applicant, and one which ESC will continue to monitor closely.</p>	<p>ESC acknowledges and strongly supports the Applicant's comments at 6.4.3.1 within <a href="#">[REP2-027]</a>, confirming that <i>'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'</i> and at 6.4.3.2 <i>'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.'</i></p> <p>ESC also notes the Applicant's commitments in 6.4.3.4 which state <i>'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.'</i></p> <p>Therefore, in summary at Deadline 3, ESC is encouraged by recent efforts by the project promoters in order to avoid future disruption to consented landscape mitigation at Friston Kiln Lane. This is a positive step. Whichever method of HVAC installation is taken forwards on the advice of the ExA should consent be granted for the Sea</p>	

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			Link project, ESC's primary concern remains the effectiveness of the consented SPR mitigation at Friston Kiln Lane. ESC is encouraged by the Applicant's responses expressed in <a href="#">[REP2-027]</a> and will continue to closely monitor and engage on this matter over the remainder of the DCO examination period, working proactively with all parties as required.	
10.06	Friston Substation - Embedded mitigation in Scenario 2	<p>See Section 6.4.3 of ESC's LIR <a href="#">[REP1-128]</a>.</p> <p>ESC considers that, should the substation at Friston Kiln Lane be delivered by the Sea Link project rather than under SPR's existing consents, the level of mitigation surrounding the substation site should not be watered down given the existing sensitivities of the local communities in that area. ESC wishes to emphasise that the agreed mitigation across the projects were found to only just be sufficient. This reinforces ESC's view that the Applicant should be using the SPR consent as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston.</p>	<p>ESC now understands that the Applicant has embedded all of SPR's approved landscape mitigation as the starting point for their own proposed embedded mitigation which is strongly supported. ESC therefore considers this matter to be closed.</p> <p>ESC does however wish to reiterate that it maintains concerns raised above in 10.05 that if open cut is selected for HVAC installation over HDD methods (if the project is consented), this would introduce gaps in planting which should be given sufficient consideration by the ExA.</p>	Matter closed