

# SEA LINK

EN020026

## Answers to Examining Authority Questions Round 1

Suffolk County Council



Deadline 3

9 January 2026

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## Glossary of Acronyms

AI	<i>Artificial Intelligence</i>
CA	<i>Compulsory Acquisition</i>
CEMP	<i>Construction Environmental Management Plan</i>
CIL	<i>Community Infrastructure Levy</i>
DCO	<i>Development Consent Order</i>
ES	<i>Environmental Statement</i>
ExQ1	<i>Examining Authority's First Round of Written Questions</i>
NSIP	<i>Nationally Significant Infrastructure Project</i>
PINS	<i>The Planning Inspectorate</i>
PPA	<i>Planning Performance Agreement</i>
SCCAS	<i>Suffolk County Council Archaeological Service</i>
SECHNLP	<i>Suffolk &amp; Essex Coast and Heaths National Landscape Partnership</i>

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

## Purpose of this Submission

The document has been prepared by Suffolk County Council to answer to the Examining Authority's First Round of Written Questions (ExQ1). The response format is based on the template provided by the Planning Inspectorate case team. For ease of reference, questions which are not addressed to Suffolk County Council have been deleted. Where another Local Authority is the lead authority, this has been attributed. Examination Library references are used throughout to assist readers.

## Answers to Examining Authority's First Round of Written Questions (ExQ1)

ExQ1	Question to:	Question:	SCC Answer:
<b>1 General and Cross-topic Questions (GEN)</b>			
<b>1.1 Artificial Intelligence</b>			
1GEN1	All parties	<ul style="list-style-type: none"><li>• The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information, or data? This does not include basic spell-check or grammar tools. If yes.</li><li>• detail what material you have submitted which has been created using AI.</li><li>• what systems or tools you used.</li><li>• what the source of the information the AI based its content on was; and</li><li>• what information or material the AI has been used to create or alter. In addition, if you have used AI, you should do the following:</li></ul>	<p>Suffolk County Council has not utilised AI to create or amend this or any document submitted during the Sea Link Examination up to Deadline 3.</p> <p>If AI is used in the preparation of future documents, the Council will ensure these are accompanied by the information requested by the ExA in this question.</p>

ExQ1	Question to:	Question:	SCC Answer:
		<ul style="list-style-type: none"><li>• clearly label where you have used AI in the body of the content that AI has created or altered and clearly state that AI has been used in that content in any references to it elsewhere in your documentation.</li><li>• tell us whether any images or video of people, property, objects, or places have been created or altered using AI.</li><li>• tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image)</li><li>• tell us the date that you used the AI.</li><li>• declare your responsibility for the factual accuracy of the content.</li><li>• declare your use of AI is responsible and lawful.</li><li>• declare that you have appropriate permissions to disclose and share any personal information and that its use</li></ul>	

ExQ1	Question to:	Question:	SCC Answer:
		<p>complies with data protection and copyright legislation.</p> <p>If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.</p>	

## 2 Draft Development Consent Order (DCO)

### 2.1 Articles Part 2 (Interpretation) “construction environmental management plan” (CEMP) and all other plans listed in Schedule 3 requirement 6

1GEN14	Applicant Local Authorities	<p>Explain whether it is the applicant's intention to produce final detailed versions of plans to be certified by the Secretary of State, as described in article 2, or to produce outline plans to be certified by the Secretary of State with the final version being approved by the relevant planning authority as implied by the wording of Requirement 6 and Schedule 19?</p> <p>Explain who would be the relevant planning authorities for the approval of such documents and for the discharge of Schedule 3 requirements in all locations and how this would work in practice with multiple host local</p>	<p>SCC considers the applicant should produce, for each management plan, an outline plan to be certified by the Secretary of State, with the final version being approved by the relevant discharging body. There is enough time in the Examination for an outline plan to be produced and examined.</p> <p>Per the Advice Note cited by the ExA, SCC considers each discharging body should be clearly named in the requirement.</p>
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ExQ1	Question to:	Question:	SCC Answer:
		<p>authorities. Please note, PINS Advice Note on Drafting Development Consent Orders states that “For clarity, such requirements should generally be drafted to identify the relevant planning authority by name.</p> <p>This could be made clear in the definitions, for example when defining ‘the relevant planning authority.’” As there are an onshore CEMP and an offshore CEMP, article 2 should be updated to list both.</p>	
<b>2.2 Article 9 Community Infrastructure Levy</b>			
1GEN26	Applicant Local Authorities	Confirm when CIL is chargeable within the relevant local authorities and therefore whether article 9 is necessary.	In Suffolk, the authorised development would in the district of East Suffolk. CIL is chargeable within that district, and more information can be found on East Suffolk Council’s website <sup>1</sup> .

<sup>1</sup> <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>

ExQ1	Question to:	Question:	SCC Answer:
<b>2.3 Article 11(2), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1)</b>			
1GEN28	Applicant Local Authorities	<p>Explain the reasons for the inclusion of the words “which consent shall not be unreasonably withheld or delayed” and define what is meant by this wording, particularly when article 11(3), article 15(9), article 17(2), article 20(9), article 22(8) and article 50(9) include a 35-day decision period.</p> <p>Provide justification for deemed consent in the absence of a decision.</p> <p>Local authorities to also provide comment.</p>	<p>“which consent shall not be unreasonably withheld or delayed.”</p> <p>SCC explained its position on the inclusion of these words in paragraphs 15.13 and 15.14 of their LIR [REP1-130] in which they state –</p> <p>“15.13 SCC will be receiving considerable numbers of requests for approval and will ensure that they are dealt with as quickly as possible. With the deeming provisions included there is no need to also say that the approvals must not be “unreasonably withheld or delayed” and so these words should be removed from article 11(2).</p> <p>15.14 SCC request that the same amendment is made to the following articles: 14(4) (power to alter layout, etc. of streets), 15(2), 15(5)(b) (temporary closure of streets and public rights of way and permissive paths), 17(1)(b) (access to works), 20(3), 20(4)(a) (discharge of water), 22(5) (authority to survey and investigate the land), 50(2) (traffic regulation), 55(1) (procedure regarding certain approvals etc.)”.</p> <p>SCC maintains its position in respect of this wording.</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>Owing to the inclusion of the deeming provision, the words mentioned above are superfluous, particularly “or delayed.” Since a decision must, in any event, be made within 35 days, SCC does not understand how it could be “unreasonably … delayed”, not least since the applicant has proposed that time limit and must therefore consider it reasonable.</p> <p>SCC notes that Fenwick Solar Project Limited, the applicant for the Fenwick Solar Farm (a DCO application which is currently at determination stage) amended article 45(2) (procedure in relation to certain approvals) during the examination as follows –</p> <p>“(2) Where paragraph (1) applies to any consent, agreement or approval, such consent, agreement or approval must not be unreasonably withheld <b>or delayed</b>”.</p> <p>The change was made at Deadline 1 of that examination on the basis “this drafting is superfluous given there is a deemed approval provision in this Article”. (See the applicant’s Schedule of Changes to the draft Development Consent Order <b>[REP1-046]</b>). SCC agrees with this reasoning.</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>Furthermore, it will be noted that the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 (SI 2009/2265) states in certain provisions – model provisions 14(3) and (4) (discharge of water), 16(4) (authority to survey and investigate land) and 34(3) (railway and navigation undertakings) – that consent (or approval) “shall not be unreasonably withheld” but it does not state consent must not be “unreasonably delayed”.</p> <p>While SCC considers all the text mentioned above should be omitted, at the very least, the words “or delayed” should be.</p> <p><u>Deemed consent in the absence of a decision</u></p> <p>SCC acknowledges that deeming provisions are an established part of the DCO regime and considers they are acceptable provided two safeguards are in place.</p> <p>The first safeguard is that the undertaker, when making the application for consent, must inform the determining authority that the deeming provision applies to that application. This safeguard is included in the draft Order <b>[CR1-029]</b>.</p> <p>The second safeguard is that SCC has a reasonable amount of time to determine the application. While SCC</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>will ensure that any application for consent will be dealt with as quickly as possible – and it has a proven track-record of doing so – it will be remembered that SCC will be receiving, at the same time, a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented (i.e. East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958).</p> <p>Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission's Norwich to Tilbury application and National Grid Interconnector Holdings Limited's LionLink Interconnector application).</p> <p>A 35-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.</p> <p>As mentioned in SCC's LIR <b>[REP1-130]</b> (paragraphs 15.15 to 15.19 and 15.72 to 15.74) SCC considers 56 days would</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>be a more realistic period for determining any application under the Order.</p> <p>Rather than a difficult-to-meet deadline, in SCC's (considerable) experience of determining applications for consent arising from DCOs, the key factor in determining an application expeditiously is the quality of the submission. It is often necessary for (say) SCC in its role as the highway authority to request revised submissions (sometimes several requests are needed) and applicants do not always provide the requested material in good time. There is no question of a local highway authority consenting a submission which is sub-standard because of the risk of compromising highway safety and so, owing to this, and given the deeming provision, SCC would have to refuse such an application within 35 days, unless an extension can be agreed.</p> <p>SCC considers it would be preferable for the parties to have the comfort of a 56-day determining period and changing references in the Order from "... within 35 days (or such other period as agreed by the street authority and the undertaker) beginning with the date on which the application was received ..." to from "... within 56 days (or such other period as agreed by the street authority and the</p>

ExQ1	Question to:	Question:	SCC Answer:
			undertaker) beginning with the date on which the application was received ..." would provide the second safeguard mentioned above.
<b>2.4 Article 11, article 14, article 15 and article 17 consistency of wording</b>			
1GEN29	Applicant Local Authorities	<p>Article 11(3) states “beginning with the date on which the application was received” and article 14(5), article 15(9) and article 17(2) state “beginning with the date on which the application was made”.</p> <p>Explain the inconsistency in wording and provide reasoning for why the 35 days should begin with the date on which the application was received or made. Local authorities to also provide comment. Update the explanatory memorandum and other core documents accordingly.</p>	<p>SCC assumes the inconsistency is an error and that, on each occasion, the 35 days should begin with the day on which SCC received the application.</p> <p>It would make no sense for an order to include an inconsistency of this nature as it risks causing confusion for all affected parties. Internal consistency is therefore essential.</p> <p>Paragraph 4.18.5 of the Explanatory Memorandum <b>[CR1-029]</b> states article 14 (power to alter layout, etc. of streets) is based on the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024. Paragraphs 4.19.2 and 4.21.2 say the same about articles 15 (temporary closure of streets and public rights of way and permissive paths) and 17 (access to works). In the equivalent provisions of the Bramford Order, the 35-day deadline begins “with the date on which the application was received”. Since SCC will be dealing with applications for both the Bramford and instant projects, it makes sense</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>for the calculation of the commencement of deadlines to be the same for both.</p> <p>For the reasons set out in SCC's LIR <b>[REP1-130]</b> (see paragraphs 15.15 to 15.19 and 15.72 to 15.74), SCC does not consider 35 days is enough time to determine these applications and that 56 days should be provided. In that context, if the 35 days began on the day on which the application was made, SCC would have even less time to determine it, which would make an already challenging situation even worse.</p>
<b>2.5 Requirement 3 converter station design</b>			
1GEN47	Applicant Local Authorities	<p>The ExA notes that the requirement does not allow the relevant planning authority to approve the design of the converter station but restricts it to confirming that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles. The ExA notes that this allows considerably greater flexibility than similar DCO requirements such as the ones for the Scottish Power Renewables consents for substations at Friston and in effect stops short of giving the</p>	<p><u>Approval of design of converter station by the relevant planning authority</u></p> <p>The Council considers that the greater flexibility sought by the Applicant is not justified based on what was deemed acceptable for the EA1N and EA2 substation site and is concerned by the proposed weakening of controls.</p> <p>The Council considers it necessary for the design, scale, and layout of the converter station to be approved by the relevant local authority. The Key Design Principles, as currently worded, are vague and include various</p>

	<p>relevant planning authorities the ability to control and approve the layout, scale, and design. Explain why this approach provides sufficient control and why a similar approach to that set out in requirement 12 of the made East Anglia ONE North DCO is not required.</p> <p>The ExA notes that requirement 3 does not stipulate that the development must be conducted in accordance with the details submitted to the relevant planning authority. Explain whether this is an oversight or whether additional wording is required.</p> <p>The ExA notes that there is no requirement in the dDCO in relation to the submission and approval of the layout, scale, or design of the substations in Kent and Suffolk, the River Fromus Bridge, or the new pylons. Is this the applicant's intention or is it an oversight? If intentional provide justification for this approach, in the light of the identified likely significant effects of the infrastructure on landscape and visual receptors.</p> <p>If it is an oversight, additional requirements are necessary and the ExA would expect these to provide robust controls over the designs and the</p>	<p>qualifications based on practicability, cost effectiveness, and efficiency. If there is no approval process for the final design, there would be no accountability for the applicant to seek to minimise, as far as possible, adverse effects through good design as it could be argued that a suboptimal design would generally accord with the design principles due to a lack of detail of the standard of practicability is within the Key Design Principles.</p> <p>An approval process would ensure that the Applicant must justify and demonstrate that it has sought, as far as is reasonably possible, to optimise the design to minimise adverse effects and that where genuine practical limitations apply, this has been demonstrated to the satisfaction of the relevant authority. This would be undertaken through a collaborative approach with the relevant authority which would further benefit the design process through the input of local expertise. In the face of the anticipated significant adverse effects caused by the converter station, the Council considers that an approval process in accordance with the design principles is necessary to minimise these effects as far as possible. The Council has also made representations criticising the Key Design Principles themselves which are not considered to be sufficient design controls as currently worded, and the Council continues to consider that</p>
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	<p>conducting of the development in accordance with approved drawings.</p> <p>Provide an explanation as to why Design Principles - Suffolk [APP-366] and Design Principles - Kent [APP-367] are not included as documents to be certified in Schedule 19 pursuant to article 60 of the dDCO.</p> <p>Local authorities to provide comments on these matters.</p>	<p>redrafting of these principles is necessary for good design to be achieved.</p> <p><b><u>Requirement 3</u></b></p> <p>Requirement 12 of the EA1N DCO (SI 2022/432) stipulates that the development must be conducted in accordance with the details approved by the relevant planning authority. SCC considers that Requirement 3 should also include this wording and assumes its omission is an oversight.</p> <p><b><u>Kiln Lane substation and the River Fromus Bridge</u></b></p> <p>The Council's comments on Requirement 3 in this answer also apply in relation to the designs of the Kiln Lane substation and the River Fromus Bridge. The Council has commented on the impacts of these pieces of infrastructure in its Local Impact Report <b>[REP1-130]</b> and considers that, as with the converter station, the adverse effects identified require robust design principles and a requirement for an approval process to be included in the DCO.</p> <p><b><u>Design Principles – Suffolk and Design Principles – Kent</u></b></p> <p>In paragraphs 15.38 and 15.39 of its LIR, SCC stated as follows in respect of these documents –</p>
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		<p>“15.38 Requirement 3 refers to “the Key Design Principles set out in the Converter Station Design Principles”. What is the status of the documents which include the Design Principles (Suffolk: <b>[APP-366]</b>, Kent: <b>[APP-367]</b>)? Neither is referred to elsewhere in the dDCO and SCC would suggest they should be defined and included in the schedule of certified documents. SCC would therefore suggest that existing requirement 3 is renumbered paragraph (1) and a new paragraph (2) is included in requirement 3 which includes a definition of the document e.g. –</p> <p>“(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60 (certification of documents) by the Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order”.</p> <p>15.39 In Schedule 19 (certified documents) to the dDCO, “Design Principles – Suffolk” and “Design Principles – Kent” should then be added to the list of documents”.</p> <p>respect of these documents.</p>
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### 3 Compulsory acquisition (CA) and temporary possession (TP) ([CR1-003] and [CR1-005] unless otherwise stated)

#### 3.1 Alternatives to CA or temporary possession (TP)

1GEN70	Local Planning Authorities  Local Highways Authorities	<p>Are any of the Councils in their roles as the local planning authority and the highway authority aware of:</p> <ul style="list-style-type: none"><li>• any reasonable alternatives to the CA or the TP which is sought by the applicant?</li><li>• any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed?</li></ul>	<p>SCC is not persuaded, as local highway authority, that there has been an adequate investigation of alternative access routes for the Saxmundham Converter Station. SCC has already set out its concerns over the existing access route and has strongly urged that an alternative route be implemented. SCC's LIR [REP1-130] explained the need for exploration of alternative access options (see, for example, paragraph 5.112 and 11.222 to 11.229) and SCC maintains its position in this regard. Were that issue to be properly addressed, the Applicant would be likely to need different CA or TP powers over land not currently included in the Order limits.</p> <p>At this stage, at the least, an alternative such as use of the consented Sizewell Link Road should be further explored in terms of the likely effects in comparison to the current proposal. Until this exercise has been undertaken, it cannot be determined that a reasonable</p>
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		<p>alternative to the CA/TP sought by the Applicant in relation to the existing access route does not exist. Consequently, if an alternative access is achievable, there would then be no need for the access point on the B1121 or the Fromus bridge crossing or the access route from the B1121 to the Converter station.</p> <p>SCC would also make the following general points regarding CA and TP powers in this context –</p> <ul style="list-style-type: none"><li>• there has been limited discussions with SCC's highways team in respect of the applicant's proposals and SCC would encourage the applicant to begin meaningful engagement with SCC on its CA and TP proposals as a matter of urgency,</li><li>• SCC expects any land subject to temporary possession to be returned to its previous state once it is no longer required, and</li><li>• SCC expects the applicant to ensure that no costs fall on SCC because of the applicant exercising any CA or TP powers in respect of SCC's land.</li></ul>
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## 4 Landscape and Visual

**4.1 Landscape vision**

1LVIA1	Applicant Local Authorities	<p>Local authorities: In view of the major adverse likely significant effects, do you consider that there is a clear vision for the landscape for the whole project?</p> <p>If not, make suggestions for how the landscape vision should be developed.</p>	<p>SCC considers that the high-level statement for landscape (aiming to be responsive and respectful to the character of the local setting), which is contained in the project design vision presented in Section 2.2 of Document 7.12.1 Design Principles – Suffolk [APP-366] has been further developed within the design principles.</p> <p>However, SCC is concerned that only the Key Design Principles in Table 3.1 and Table 4.1 are to be secured [paragraphs 1.3.8-1.3.9, APP-366].</p> <p>The Key Design principles only relate to the converter station at Saxmundham and the substation at Friston and do not cover other areas, such as the approach across the river Fromus, the cable corridor, and the landfall site.</p> <p>SCC considers that design principles need to cover and be secured for the entire DCO area and does not follow the Applicant's reasoning why Overarching and Project Level Design Principles cannot be secured.</p> <p>Regarding the converter station, although it is anticipated that work on its design would continue post-decision, if the Secretary of State granted development consent, SCC (Landscape) is concerned about how little detail has been provided.</p>
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		<p>There is a lack of an integrated approach, which would bring together related natural environment topics such as Landscape and Visual, Ecology, Archaeology, Rights of Way and Floods.</p> <p>Around the converter station site, the proposed landscape and visual mitigation is considered inadequate. The proposed tree belts/woodlands do not match the scale of the development, and it would be difficult to successfully accommodate Rights of Way as shown in the sections at the end of 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348], as the corridors for these rights of way would appear to be too narrow, resulting in the tracks becoming shaded, and therefore muddy and unusable in wetter months of the year. The visual mitigation should be multi-layered, rather than relying on tree belts, which cannot screen the height of the converter station structures. The proposed hedge, with trees, along the B1119, is not considered sufficient to provide the required layered approach to visual screening.</p> <p>There is thus far no clear strategy for replacing trees which are lost within the cable corridor, and which cannot be replaced therein. SCC would welcome a similar commitment to National Grid's Norwich to Tilbury scheme, where lost trees are to be replaced at a ratio of</p>
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			<p>three new trees for every lost tree, within and outside of the DCO boundary.</p> <p>The vision should also include improvements to rights of way with a view to improve connections towards the coast.</p>
1LVIA4	Applicant	<p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Local authorities may also like to comment.</p>	<p>SCC considers that this is a matter for the relevant discharging authority, i.e. East Suffolk, but considers that operational lighting schemes, in particular external lighting, should be agreed with the relevant planning authorities.</p>

#### 4.2 National Landscape (NL) duty

1LVIA7	<p>Natural England, Suffolk &amp; Essex Coast &amp; Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk</p>	<p>Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2.</p> <p>In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.</p>	<p>SCC has commented on this document in its responses to submissions received by Deadline 1 or Deadline 1A – Table B5 of [REP2-062]. There, SCC provided comment on the insufficiency of the proposed measures to meet the requirements of the section 85 (A1) duty (“the duty”). SCC has also questioned the Applicant’s assessment of the likely effects on the SECHNLP’s natural beauty indicators in paragraphs 5.46 to 5.58 of SCC’s LIR [REP1-130].</p> <p>Here, SCC would like to take the opportunity to provide further comment on the Applicant’s approach to the duty and the consideration of the project’s effects and cumulative effects on the natural beauty indicators.</p>
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District Council		<p>It is worth reiterating that the measure of enhancing acid grassland, which is in essence an offsetting measure for individual adverse impact, cannot, in itself, be sufficient to discharge the duty.</p> <p>The measure is intended to remedy the temporary loss of existing acid grassland during the construction phase. In terms of effects on natural beauty, this means that the adverse effects caused by the loss of acid grassland are those being offset by the acid grassland enhancement. However, there are other sources of adverse effect which go beyond just effects on acid grassland such as from the works being done, associated equipment, associated traffic, and the construction compound. No measures are proposed to offset these effects through conservation or enhancement of the National Landscape's natural beauty. Consequently, SCC does not see how there is any real prospect of the purposes of conservation and enhancement of the National Landscape's natural beauty being furthered when considering the totality of harm it will experience, beyond acid grassland loss, as a result of the proposed development.</p> <p>SCC has relayed its concerns over the sufficiency of the measures to adequately further the natural beauty of the SECHNL in terms of the status of acid grassland within and surround the Order Limits in Table B5 of [REP2-062].</p>
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		<p>However, it is worth emphasising and expanding on certain points here.</p> <p>A key concern relates to the fact that only enhancement, rather than creation, of acid grassland is now proposed as indicated in paragraph 3.2.3. This means that there will not be any increase in the area of acid grassland to offset its reduction during construction. The proposal is therefore less robust as an offsetting measure as it does not rectify the temporary decrease in acid grassland provision. Hence, there will be no remedy for acid grassland loss for a substantial period, with restoration of acid grassland removed during construction projected to be completed by Q3 of Year 6. By consequence, net-enhancement of acid grassland is projected to only last 4.25 years due to the 10-year maintenance period.</p> <p>Whilst there is potential for the enhancement of acid grassland to persist beyond the 10-year maintenance period, it is problematic to rely upon this notion in relation to discharging the duty. The Applicant will not have land rights to the area after 10 years meaning the previous landowner would be within their rights to remove or otherwise undermine the enhanced acid grassland. In any case, the quality of the enhancement would begin to deteriorate once the maintenance period is over and the rate of deterioration is not known at this stage.</p>
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		<p>Minor adverse effects are identified beyond the construction period, only being identified as negligible or lower at year 15 of the operational phase. The Applicant's assessment does not indicate what the effects would be at the point upon which the maintenance of the enhanced acid grassland ends which roughly translates to year 5 or 6 of the operational period. As a result, SCC considers that there is a substantial risk of a further period of unmitigated adverse effects on natural beauty during the operational phase with no commitment to offsetting measures.</p> <p>If the sufficiency of this measure in relation to effects on acid grassland (and its associated contributions to natural beauty) is questionable at best, then it is not clear how the measure could be said to be sufficient for the totality of harm on natural beauty caused by the project.</p> <p>Consideration should be given to how the proposed measure will be experienced by people interacting with the natural beauty of the National Landscape. The proposed parcel of land is located within a farmer's field surrounded by shrubbery. Whilst a PRoW is adjacent to the parcel of land, it is relatively tucked away from users of the National Landscape and certainly more so than the bulk of works adversely affecting the National Landscape. The extent to which users of the National Landscape will actually experience enhanced natural beauty in</p>
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		<p>comparison to the extent to which this experience will be adversely affected by the proposed development does not appear to have been considered. It is possible that a different parcel of land, or a different type of measure, would be more noticeable to users of the National Landscape even if the extent to which natural beauty itself is enhanced remains unchanged.</p> <p>The Council is also concerned with the Applicant's approach to cumulative effects in relation to the duty. Significant cumulative effects are identified for several natural beauty indicators and yet no measures are proposed on account of these effects. The Applicant's reasoning for this appears to be based on the "short and temporary" (e.g. para 5.1.7) nature of these effects. However, this consideration is already accounted for when coming to the conclusion of significant effect as duration of effect is a relevant factor when making such a judgement. The Applicant has used consideration of duration of magnitude to justify effects not being significant for cumulative effects on other receptors in [APP-060]. Therefore, it is not clear how the Applicant can both assess effects to be significant in spite of their temporary nature and claim that such effects nevertheless do not require enhancement measures on account of their temporary nature.</p>
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		<p>Acid grassland is not mentioned in the assessments of cumulative effects on Scenic Quality, Relative Wildness and Relative Tranquillity. As a result, it is difficult to see how acid grassland enhancement could conserve and enhance natural beauty in respect of the adverse cumulative effects on these natural beauty indicators.</p> <p>The duty applies in relation to a relevant authority performing a function in relation to, or so as to affect, a designated landscape. The function of consenting the current form of the scheme would either exacerbate existing significant cumulative effects or push existing adverse effects beyond the threshold of significance. SCC does not see how the application could be considered compliant with the duty without additional measures proposed in relation to the identified adverse cumulative effects.</p>
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<b>ExQ1</b>	<b>Question to:</b>	<b>Question:</b>	<b>SCC Answer:</b>
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## 5 Ecology and biodiversity

### 5.1 Tree pruning

1ECOL17	Applicant Local Authorities	Paragraph 1.2.11 of the Arboricultural Impact Assessment [APP-294] states that clearance pruning would be required for the site access. Confirm how the deterioration of ancient and	Ancient and Veteran trees would need to be pruned according to the British Standard (“BS”) 3998 for tree work recommendations and BS 5837 for trees in relation to design, demolition and construction recommendations.
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ExQ1	Question to:	Question:	SCC Answer:
		<p>veteran trees would be avoided if substantial pruning is required? The local authorities may wish to comment on this matter.</p>	<p>The Council notes that the cited BS are currently being reviewed having gone through the consultation process and are due for updates soon. Should the standards be updated prior to commencement, the Applicant's control documents should be updated to reflect this before approval.</p> <p>Details need to be provided of what is happening both below and above ground to ensure the trees are protected in terms of their RPAs as far as possible. Details of the clearance requirements would assist the Council in understanding the likely impacts on these trees and it should be demonstrated that the trees can be retained with these clearance requirements. The Arboricultural method statement must ensure these trees are protected including where incursions into RPAs are required. For instance, if a permanent bellmouth is required within an RPA then a permeable surface should be implemented.</p> <p>The final designs of site accesses should include detail of how the bellmouths would superimpose on affected ancient and veteran trees. The final design of site accesses should also seek to minimise impacts on ancient and veteran trees as far as possible.</p>

ExQ1	Question to:	Question:	SCC Answer:
<b>6 Cultural Heritage</b>			
<b>6.1 Inclusion of heritage assets in ES assessment</b>			
1CH3	Historic England  Kent County Council  Suffolk County Council	Are there any designated or non-designated heritage assets within either county that were not considered within the ES, or that were scoped out for further assessment within the ES, which should have been assessed? Furthermore, were the study areas used sufficient to include all heritage assets which could be impacted by the proposed development?	<p>SCCAS are satisfied that all known undesignated assets within the red line boundary (and immediate vicinity) were considered within the ES and that the programme of archaeological evaluation which has been undertaken so far has, for the vast majority of the red line boundary, enabled an understanding of the below ground undesignated heritage assets which could be impacted by the proposed development.</p> <p>Completion of evaluation works for any remaining areas of the Order Limits where this has not yet been undertaken will ensure that all below ground heritage assets which could be impacted by the scheme will be able to be defined and assessed to enable appropriate mitigation strategies to be determined. It is the Council's understanding that remaining areas of evaluation have not been completed due to environmental and ecological constraints and will be completed post-consent.</p> <p>SCCAS defer to Historic England regarding opinions on any additional designated assets which should be assessed.</p>

ExQ1	Question to:	Question:	SCC Answer:
<b>6.2 Areas not currently assessed</b>			
1CH5	Applicant Historic England Suffolk County Council Kent County Council	<p>SCC in section 7 of its LIR [REP1-130] states that there are areas within the order limits that have not been included in the trenched evaluations undertaken to this point, such as areas around the proposed Friston substation site, which would still need assessing.</p> <p>For the applicant, provide a plan to show areas that still require archaeological assessment and confirm when this will be done. Also, explain why this remaining assessment work has not yet been undertaken.</p> <p>For Historic England, SCC, and KCC: If there are areas where further assessment work is required, should this be done before the close of examination so that the results can be considered along with any necessary mitigation? Or could this be done after any potential consent through secured commitments/requirements?</p>	<p>SCCAs are satisfied that the large majority of the red line boundary has been subject to sufficient archaeological assessment, through desk-based assessment, non-intrusive works such as geophysical survey and intrusive techniques such as trial trenched evaluation.</p> <p>The areas of the scheme where evaluation remains outstanding are fairly limited but include new areas which have been added to the scheme since evaluation work was completed, areas where access was not previously possible or where constraints were present that prevented evaluation works at this stage.</p> <p>As these are relatively small areas which are not currently known to contain, or are immediately adjacent to, designated heritage assets or recorded undesigned heritage assets of high sensitivity, SCCAs do not object to this work being undertaken post- consent and secured through suitable worded Requirements and the OWSI, although it should be completed at the earliest opportunity in order to allow mitigation requirements to be established in a timely manner.</p>

## 7 Water Environment

ExQ1	Question to:	Question:	SCC Answer:
<b>7.1 Sequential and exception test</b>			
1WE1	Environment Agency  Suffolk County Council  Kent County Council	<p>Provide a response with respect to the acceptability and policy compliance of the applicant's sequential and exception test as included in the Flood Risk Assessment [APP-292]?</p> <p>In answering, although the ExA notes that the proposed substations, converter stations and cable transition joint bays are all located in Flood Zone 1, specifically cover the manner in which the Exception Test has been applied by the applicant regarding the presence of some components of the scheme (construction routes and cables etc) being necessarily in Flood Zones 2 and 3.</p>	<p>SCC considers that the linear nature of the Suffolk Onshore Scheme along with the multitude of social and environmental constraints means that it is inevitable that not all parts of the scheme can reasonably be located within areas at the lowest risk of surface water flooding. The Council is satisfied that the most vulnerable parts of the scheme have been sited to avoid areas at high risk of surface water flooding. However, outstanding concerns regarding the adequacy of the DCO and outline management plans in relation to minimising the residual risk for surface water flooding should be addressed. See SCC's deadline 3 submissions, chapter 8 of [REP1-130] and Table A4 of [REP2-062] for more details.</p> <p>For matters relating to the exception test and flood risk aside from surface water, SCC as the LLFA defers the acceptability and policy compliance of the sequential and exception test to the Environment Agency and would fully support their view.</p>

ExQ1	Question to:	Question:	SCC Answer:
<b>8 Traffic and transport</b>			
<b>8.1 Overlapping construction programme</b>			
1TT12	<p>Applicant            Suffolk            County            Council            Kent County            Council</p>	<p><b>Applicant</b></p> <p>In the applicant's response to RR [REP2-014] (specifically responding to SCC comments) it is stated that there could be a minor/moderate cumulative effect which could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the proposed development and other projects (such as Sizewell C and LionLink) overlapped precisely. A possible moderate cumulative impact would potentially be disruptive for people who live in the area, especially if it lasts for nine months. What more can the applicant provide and secure to ensure that this level of cumulative effect is avoided or further mitigated?</p> <p><b>Councils</b></p> <p>What is the local highway authorities view of this potential situation?</p>	<p>The council maintains its previously stated views made in the Relevant Representation paragraphs 31 &amp; 32 [RR-5209] and Local Impact Report [REP1-130] that the cumulative impacts will significantly affect the communities to the south of Saxmundham, including Benhall and Sternfield.</p> <p>The route along this road provides walking facilities in the form of a narrow footway on one side of the road, from Benhall, Sternfield and the WhiteArch Residential Park into Saxmundham, and a continued use of 9 months or more by construction traffic for several projects would create a detrimental environment for non-motorised users. Due to the lack of crossing facilities in this location there will also be severance between Saxmundham, and the previously mentioned communities as increased traffic counts will make crossing the road significantly more dangerous. This route is a potential walking route used by school children attending the primary school in Benhall.</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>There will also be a cumulative impact on the A12 junctions with the B1121 (Benhall) and B1119 (Saxmundham). The A12 will be used by SPR, SZC and Sealink through traffic with additional joining / leaving movements at the A12/B1121 by Sealink (and potentially Lionlink) construction vehicles, the B1121/B1119 junction in Saxmundham and the A12/B1119 by Sealink / Lionlink construction vehicles and local traffic diverted whenever the B1121 at Benhall is closed. In all cases this will cause significant delays to traffic, potentially being hazardous due to the junction geometry and traffic crossing a dual carriageway. In addition to this, the closure of the B1121 to temporary overbridge or repair the Benhall railway bridge and possibly to build the new access to the River Fromus Bridge will disrupt the highway network on potential diversion routes, which may include the A12 / B1119 junction and the crossroads in the centre of Saxmundham.</p> <p>Potential solutions are: -</p> <p>Control: caps to be placed on the maximum daily and peak hour movements of HGVs supported by robust monitoring and enforcement. This would ensure the impacts do not exceed those assessed in the ES or traffic modelling (where appropriate).</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>Mitigation:</p> <p>B1121 Benhall: In SCC's view the key improvements that two measures that would help mitigate the impacts of construction traffic on the B1122 in Benhall and towards Saxmundham would be to provide safe crossing points and wider footways, ideally to a standard that would allow conversion to a cycleway. The latter would be difficult to achieve within the existing highway boundary particularly as roots from the hedge may be disturbed by any construction. Choice of the type of crossing will be dependent on the volume and speed of traffic, risk to pedestrians and duration of the impact, if sequential with Lion Link formal traffic control would be considered proportionate.</p> <p>A12/B1121 junction: temporary speed reduction or other safety measures with capacity improvements if identified by modelling.</p> <p>B1121/B1119 Saxmundham traffic signals. Junction modelling at peak and inter peak hours would show if lack of capacity is a constant problem and cannot be reduced by restriction peak hour movements of construction traffic. The junction was upgraded with MOVA and</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>together with constrained geometry few improvement options seem available.</p> <p>A12/B1119 Rendham junctions: Avoidance by removing the need to divert traffic on this route. If this is not possible temporary speed reduction or other safety measures with capacity improvements if identified by modelling.</p>
1TT13.	Suffolk County Council Kent County Council	<p><b>Cumulative traffic assessment</b></p> <p>Considering all the information submitted up to and including that received from the applicant at deadline 2, what further data or analysis (if any) would the Local Highway Authorities require from the applicant to be satisfied that the cumulative traffic assessment is sufficiently robust?</p>	<p>SCC has commented on the cumulative traffic assessment [REP1-110] submitted by the Applicant at Deadline 1 in Table B3 of [REP2-062]. In that response, the Council gives detail on what further information it requires in relation to the cumulative traffic response and will comment further once the Applicant's response and any further information is provided. SCC also expects the methodological issues raised in Chapter 11 of its LIR [REP1-130] in relation to the traffic and transport assessment [APP-054] to be addressed for the cumulative traffic assessment insofar as those issues also apply to that assessment.</p> <p>In terms of further data and analysis, SCC would expect the cumulative impact of Sea Link in combination with SPR EA1(N), EA2, Lion Link and SZC on the A12 to be assessed. The A12 is the main conduit for construction vehicles and in the case of previously consented DCOs</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>restricted to that route. Assessments were undertaken by both SZC and SPR of the combined impacts and it is reasonable to expect Sea Link to undertake a similar exercise.</p> <p>However, SCC recognise that significant changes are being made to the A12 and therefore have undertaken a review of junctions on the A12 to identify those of specific concern and exclude those being changed. See Appendix A: Traffic Assessment for this review which includes actions which should be undertaken to provide the expected level of data and analysis for cumulatively affected receptors on the A12.</p> <p>The scale of impact by this project on the A12 is less than SZC in terms of HGV numbers and duration, but still in SCCs opinion significant. The section of the A12 between the A12/A14 Seven Hills Interchange and A12/A1152 Woods Lane Roundabout is included within SCCs A12 Major Road Network scheme currently seeking planning permission. If successful construction may commence in 2027 with a construction period of 18 months to 2 years. In the SZC examination SCC successfully argued that whilst construction traffic impacts would not trigger mitigation on this part of the A12 there was a measurable delay to traffic on the A12 which can be mitigated by the</p>

ExQ1	Question to:	Question:	SCC Answer:
			<p>A12 MRN scheme and thus it was reasonable for SJC to contribute to this scheme. This was secured in the Deed of Obligation Schedule 16 'A12 Contribution'<sup>2</sup>.</p> <p>Subject to assessment of delay supporting this SCC would seek a proportional contribution towards the A12 MRN scheme by Sealink.</p> <p>SCC also mentioned the A12 MRN in Chapter 11 of its LIR [REP1-130]. It has since been noted that the project has now applied for planning permission. As such, the Applicant should take into account the likely adverse effects arising from the project on the A12 during construction which could combine with Sea Link in the Applicant's cumulative traffic assessment.<sup>3</sup></p> <p>Similarly, the Essex and Suffolk Water pipeline project has since launched and undertaken consultation. A proposed route appears to interact with the Applicant's proposals. Active communication should be sought by the Applicant and consideration given to the need to assess cumulative</p>

<sup>2</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-008240-SJC%20Co.%20-%20Final%20signed%20and%20dated%20s.106,%20final%20s.106%20Explanatory%20Memorandum%20and%20final%20Confirmation%20and%20Compliance%20Document%208.pdf>

<sup>3</sup> See <https://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0170%2F25SC#undefined>

ExQ1	Question to:	Question:	SCC Answer:
			impacts, whether presently or once more details are known. <sup>4</sup>

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<sup>4</sup> <https://suffolkwaternetwork.co.uk/>

## 9 Air Quality

### Cumulative air quality effects

1AQ3.	East Suffolk Council	<p>ESC [RR-1420] notes specific concern with cumulative effects arising from construction traffic (including on air quality). Having reviewed the air quality assessment [APP-055] and [APP-068] and the cumulative vehicle emissions assessment [REP1-123], the council should confirm whether it has any residual concerns about specific road links/receptors in light of the limited effects identified in relation to construction traffic emissions and the relatively low background pollutant levels and if not, why not?</p>	<p>In its role as the Public Health authority, SCC offers comment on this question. SCC has commented on the referenced documents from a public health perspective in chapter 12 of its LIR [REP1-130] and Table B6 of [REP2-062]. Here, in response to [REP1-123], SCC noted particular concern with R1 for both NO2 and PM2.5 levels due to the harm these levels pose to human health despite falling under national statutory limits. Similar comments apply to any other receptor where pollutant levels are above the WHO recommended level.</p> <p>The Council reiterates that practicable measures should be taken to minimise pollutants as far as possible to levels recommended by WHO, particularly where high number of people are likely to interact with a receptor or where vulnerable groups may be disproportionately affected.</p>
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## 10 Socioeconomics, recreation, and tourism

### 9.1 Construction worker spending

1SERT2	Applicant	What would be the difference between the spending locally of construction workers,	Patterns of spending are different because the demographic characteristics, and the fact this is a
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	All County and District Councils	<p>staying locally in accommodation like hotels for example, compared to tourists staying the same areas?</p>	<p>transient working population rather than a seasonal tourist population means that local business principally geared to tourist market are unlikely to benefit from the spending of construction workers.</p> <p>So, whilst accommodation providers will receive income downstream spending by occupants of this accommodation, it will not follow established local patterns. For instance, tourists are more likely to spend on recreational goods and activities with repeated spend expected from future visits as opposed to the likely temporary nature of spend coming from construction workers temporarily housed in local accommodation. In general, tourists visiting destinations close to the Order Limits such as Aldeburgh tend to have above average spending power whilst that of construction workers tends to be lower which also influences the spending habits of both groups.</p>
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## 9.2 Employment and skills plan

1SERT7	<p>Applicant County and District Councils</p>	<p><b>Applicant</b></p> <p>It is acknowledged that the ES for Suffolk [REP1A-005] and Kent [REP1A-007] has concluded that there would not be any likely significant adverse effects in relation to construction employment.</p>	<p>Suffolk County Council considers that an employment and skills plan is both necessary and proportionate for the Sea Link project. While the Applicant's Environmental Statement concludes that there are no likely significant adverse effects on construction employment, this does not remove the obligation under NPS EN-1 Paragraph 5.13.12, which clearly states that the Secretary of State</p>
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	<p>However, NPS EN-1 at paragraph 5.13.12 states that the: "Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted." Considering the wording of this paragraph of the NPS, explain why the applicant considers that a Skills and Employment Plan is not necessary, especially given the scale of the proposal.</p> <p><b>Councils</b></p> <p>Provide your views on the need for an employment and skills plan, and if it could be of practical benefit over and above commitments currently made by the applicant.</p>	<p>may require an employment and skills plan to promote local employment and skills development opportunities, including apprenticeships and engagement with local schools and colleges. This expectation applies irrespective of whether adverse effects are identified and reflects the national policy objective to secure positive socio-economic outcomes from major energy infrastructure projects. The employment and skills plan is the mechanism to translate national and local policy objectives into tangible outcomes. Suffolk's Local Plan and SCC's Energy and Climate Adaptive Infrastructure Policy require major projects to maximise economic and community benefits, including skills development and local employment. Without a formal plan, these objectives remain aspirational rather than actionable.</p> <p>The Applicant's own socio-economic assessment assumes a 70% leakage rate and significant displacement, meaning that without intervention, the majority of employment benefits will accrue outside Suffolk. An employment and skills plan provide the practical mechanism to mitigate this risk and ensure that headline economic benefits translate into tangible local outcomes. It would enable targeted local recruitment, skills brokerage, and engagement with Suffolk's education providers.</p>
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			<p>The need for an employment and skills plan is further reinforced by the cumulative context. Sea Link will be delivered alongside numerous other NSIPs in the local area, including Sizewell C, creating unprecedented pressure on the regional labour market, the effects of which are already being reported by local businesses. Without coordinated planning, these overlapping demands risk exacerbating skills shortages, increasing competition for labour, and displacing workers from existing employers. An employment and skills plan, coordinated via Suffolk County Council's Regional Skills Coordination Function (RSCF), provides the governance framework to align workforce demand, training provision, and local engagement across the project lifecycle, helping to mitigate these risks and support a resilient labour market.</p> <p>The Council also considers that an employment and skills plan is essential to deliver a long-term skills legacy. Contributions to initiatives such as the Asset Skills Enhancement Capability Fund, Employment Outreach Fund and Bursary Fund would support local colleges, underrepresented groups, and pre-employment pathways, ensuring that Suffolk residents can access opportunities created by the project. These measures would be proportionate and efficient, using established</p>
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		<p>regional governance structures to avoid duplication and maximise impact.</p> <p>In summary, the Councils believe that an employment and skills plan would provide clear practical benefits over and above the Applicant's current commitments. It would secure enforceable targets for local employment and apprenticeships, embed social value and local procurement obligations within Tier 1 and Tier 2 contracts, and establish a transparent governance framework for monitoring and reporting. These measures are essential to comply with national policy, manage cumulative impacts, and ensure that Suffolk's communities gain a lasting legacy from hosting nationally significant infrastructure.</p>
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ExQ1	Question to:	Question:	SCC Answer:
<b>11 Cumulative effects (intra-project)</b>			
<b>10.1 Significant intra-project cumulative impacts and mitigation (ISH1)</b>			
1CEIntra2	Suffolk County Council  Kent County Council  East Suffolk Council  Thanet District Council	<p>Can the councils comment on the applicant's response to AP8 regarding identification of significant effects [REP1-124] and AP9 with respect to the applicant's approach to mitigation of identified cumulative intra-project significant effects [REP1A-037]?</p>	<p>The Council recognises that the professional judgement involved in drawing such conclusions on combined qualitative effects can be difficult to substantiate. Whilst acknowledgement of uncertainty on the level of effect is preferred over unjustified certainty, it is difficult to see why no indication of magnitude of effect can be given even if a definitive one is not possible.</p> <p>SCC considers that a cautious approach should be taken in relation to the classification of these effects to avoid any being interpreted as less severe than they are. As such, effects should be treated as 'major,' rather than 'moderate,' unless there is overriding reason to believe that a major effect can be ruled out. This should also be reflected in the Applicant's approach to mitigation.</p> <p>As stated in the Council's previous representations, it is not acceptable for significant effects to go unmitigated without further measures proposed. Relevant policy and legislation are clear that the mitigation hierarchy must be followed for significant effects. The mitigation hierarchy is defined in EN-1 as "A term to incorporate the avoid,</p>

			<p>reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity". Paragraph 4.3.4 of EN-1 states that applicants must "show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy." Paragraphs 4.2.10 and 4.2.11 further solidify the fact that applicants must apply the mitigation hierarchy and demonstrate how it has been followed.</p> <p>The Council does not consider that the mitigation hierarchy has been fully followed by the applicant in relation to these significant effects as there does not appear to be evidence of exploration of compensatory measures. The Applicant's response to AP-9 states that it is not possible to detail mitigation measures at this stage. Without this detail, SCC does not see how the decision maker can be confident that significant effects will be sufficiently mitigated which is exacerbated by the lack of any specific commitment within control documents to mitigate such effects post-consent.</p> <p>Given the facts of the scenario, the Council would expect the Applicant to collaborate with contractors to seek to provide details of potential mitigation measures at this stage. Failing this, EN-1 and the EIA regulations are clear that compensatory/offsetting measures must be explored and implemented where feasible. SCC has suggested</p>
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			<p>several such measures in its previous representations such as [RR-5209] and [REP1-130] and has repeatedly communicated the need for enhancement measures, such as through PRoW creation, in its pre-application engagement with the Applicant.</p> <p>Notwithstanding SCC's objections, were the Applicant's approach deemed acceptable, SCC does not consider the commitments cited by the Applicant to be sufficient in securing post-consent mitigation for the identified significant effects. Each of these are considered in turn:</p> <ul style="list-style-type: none"><li>• GG27 does not mitigate effects but secures communication channels for affected members of the public.</li><li>• GG03 and GG05 relate to monitoring and general worker awareness respectively without securing any measurable reduction of effects in themselves.</li><li>• TT03 does not guarantee effects on PRoW will be lower than assessed and does not reflect SCC's ask for PRoW closures to be avoided.</li><li>• NV03 only requires mitigation action where effects are materially new or different to those assessed and so does not require the significant cumulative</li></ul>
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			<p>effects to be reduced beyond the assessed magnitude of effect.</p> <ul style="list-style-type: none"><li>• The CTMTP measures cited also do not require assessed effects to be reduced. Instead, the measures mainly relate to compliance and monitoring with the potential for “areas of improvement” to be identified rather than required.</li></ul> <p>The rest of the Applicant’s response reflects an unacceptable approach in SCC’s view. The Applicant appears to propose a reactive approach whereby significant effects are mitigated following their observation rather than pre-emptively. Whilst this is understandable where effects exceed the levels assessed (e.g. non-significant effects reported in the ES becoming significant during delivery), it is not acceptable for effects assessed as significant in the ES. The previously made point of policy requirements to implement the mitigation hierarchy are relevant here in addition to the fact that the approach risks significant effects to occurring without mitigation for a temporary period. This is not acceptable when such effects are known to likely be significant in advance and so should be avoided through pre-emptive mitigation. If this is not feasible, or the feasibility is not</p>
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		<p>certain at this stage, then offsetting measures must be sought as required by EN-1.</p> <p>Finally, whilst the commitment to ensure open lines of communication with affected members of the public is welcome, it cannot be relied upon to be the measure of whether a significant effect has arisen. It is not the responsibility of the public to report effects to the developer. Reports from members of the public should be treated as an impetus to review the monitoring and compliance procedures and investigate whether an instance of non-compliance has occurred which should be immediately rectified.</p>
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ExQ1	Question to:	Question:	SCC Answer:
<b>12 Climate Change</b>			
<b>11.1 R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council Judgment</b>			
1CC1	<p>Applicant            Suffolk            County            Council            Kent County            Council            East Suffolk            Council            Thanet            District            Council</p>	<p><b>Applicant</b>            The Climate Change assessment [APP-085] states that it is not possible to calculate the likely upstream and downstream direct or indirect effects and any resultant increases or decreases in greenhouse gases. Can the applicant justify their position and provide specific examples of other NSIP which have taken this approach?</p> <p><b>Councils</b>            Do you agree with the applicant's position and approach? If not, why not?</p>	<p>Whilst electricity transmission, as opposed to generation, does not in itself necessarily preclude the identification of direct and indirect upstream and downstream effects, it is acknowledged that there are various complexities involved. Complexities such as the lack of identification of end users suggest that accurately calculating the likely resulting effects on greenhouse gas emissions would be difficult. However, the Council awaits the response of the Applicant which will provide further information, including on examples of other NSIPs and will comment further as appropriate.</p>

# SEA LINK

EN020026

## Appendix A (Traffic Assessment)

**Identification of areas that require modelling and safety assessment**

Suffolk County Council



## A12

Junction	Parish	Proposed works / Mitigation	Details	Stage	Concerns	Comments	Actions	
A12/A14 Seven Hills	Buckleswood	SCC A12 MRN Scheme	Widened entry / exit lanes.	Planning	Capacity concerns raised by NH	Increased traffic relating to Sealink may justify contribution to A12 MRN scheme	Calculation of proportional impact of project on route delays.	
A12/C322 Foxhall Roundabout	Foxhall				Capacity, road safety			
A12/Eagle Way BT Roundabout	Martlesham Heath				Capacity, road safety			
A12/Tesco's Roundabout	Martlesham				Capacity			
A12/A1214 Park and Ride	Martlesham				Capacity			
A12/B1438 Seckford Roundabout	Martlesham		Widening to dual carriageway		Capacity			
A12/B1079 Grunburgh Roundabout	Woodbridge				Capacity			
A12 NB / C313 Manor Road	Woodbridge		Delay for joining traffic		Increased traffic relating to Sealink may justify contribution to A12 MRN scheme	Calculation of proportional impact of project on route delays.	Junction modelling and safety assessment	
A12/A1152 Woods Lane Roundabout	Woodbridge							
A12/C309 Bredfield	Bredfield	SCC A12 MRN Scheme	Capacity improvements	Planning	Delay, Road safety / gap jumping	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	
A12/U3415 Ufford Road	Ufford							
A12 SB B1438 Ufford	Pettistree		Pedestrian crossing / footways on A12	Commences 2026				
A12 NB B1438	Hatcheston							
A12/B1078 Interchange			SZC Local Roads	Under construction		SZC scheme does not address delays leaving side road. Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	
A12/U2213 Marlesford Road								
A12/ C241 Bell Lane	Marlesford		Pedestrian crossing / footways on A12	Commences 2026		Junction modelling and safety assessment	Junction modelling and safety assessment	
U2212 Keepers Lane								
U2316 Church Road	Little Glemham	SZC Local Roads	Pedestrian crossing / footways on A12	Commences 2026	Pedestrian severance / amenity			
C244 Buttons Road	Little Glemham				Delay, Road safety / gap jumping			
Chapel Road / Tinkers Brook	Stratford ST Andrew	S2C - Two Village Bypass	New roundabout	Commences Q1 2026				
C245 Great Glemham Road			Bypassed					
C246 Low Street			Bypassed					
A12/A1094 Friday Street	Benhall		New roundabout	Under construction				
A12/B1121	Benhall				Delay for joining traffic, Road Safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	
A12 / B1119 Rendham Road	Saxmundham	SZC Local Roads	Minor capacity improvements	Commences Q1 2026	Delay for joining traffic, Road Safety			
A12/Carlton Road	Kelsale cum Carlton				Road safety			
A12/B1121 Dorleys Corner								
U2402 Town Farm Lane								
U2501 Old High Road	Yoxford	SZC Local Roads	Pedestrian crossing / footways on A12	Commences Q1 2026	Pedestrian severance / amenity on A12			
A12/A1120								
A12/B1122 Leiston Road		SZC - A12 Yoxford Roundabout	New roundabout	Under construction	Capacity			
C226 Westleton Road	Darsham							
C225 The Street					Delay for joining traffic, Road Safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	
C212 Willow Marsh Lane		SZC - Northern Park and Ride	Temporary stopping up of road					
U2807 Lymballs Lane					Road Safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	safety assessment	
A144 High Street	Thorington	SZC - Local Roads	RH turn lane and NB slip off lane.		Capacity, road safety			
U2805 Hinton Road	Darsham	SZC - TCPA	New RH turn lane.	Planning	Potential improvements to side road and junction to serve SZC accommodation			
C204 Hazels Lane / C221 Butchers Lane	Thorington							
B1387 Walberswick Road	Blythburgh	SZC - Local Roads	Minor junction improvements / widening	Commences 2026				
C202 Wenham Lane					Road Safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	safety assessment	
B1125 Angel Lane					Capacity, delay for joining traffic, road Safety			
A12/A145					Delay for joining traffic			
A12/A1095								
A12 Wangford Road/ B1126 Norfolk Road	Wangford							
C927 Guildhall Lane	Wrenham							
B1127 Southwold Road					Road safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	
U1730 Priory Road / U1607 Locks Lane								
C921 / U1606 The Street	Benacre							
A12/B1437 The High Street	Kessingland				Road safety			
A12/B1437 London Road								
A12 / U1707 Gisleham Roundabout	Gisleham							
A12 Bloodmoor Road Roundabout	Lowestoft				Capacity, road safety.	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment	

## Other Roads

Junction	Parish	Proposed works / Mitigation	Details	Stage	Concerns	Comments	Actions
A1094/B1069 Snape Crossroads	Snape				Capacity, delay, road safety	Cumulative increases in traffic, including that from Sealink will aggravate existing problem	Junction modelling and safety assessment
A1094/B1121	Friston				Swept path, capacity, road safety		
A1094/B1122 Roundabout	Aldeburgh				Swept path, capacity, road safety		
B1119/B1121 Signals	Saxmundham				Capacity, delay, road safety		
B1119 Leiston to Saxmundham	Knodishall				Road Safety - route		
B1069 Knodishall					Road Safety - route		