

SEA LINK

EN020026

Comments on Submissions received by Deadline 2

Suffolk County Council



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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>LLFA</i>	<i>Local Lead Flood Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>

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

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written response to submissions received by the Examining Authority (ExA) at Deadline 2.

Examination library references are used throughout this document to assist readers. The Council has not been able to respond exhaustively to the Applicant’s comments on the Council’s Local Impact Report [REP2-026] and so has not responded where it is considered that the Applicant’s response has not addressed the original comment and the Council has nothing further to add.

Comments on further information/submissions received by Deadline 2

Section A – 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
Table A2 – 3.1 Applicant's Comments on Chapter 5: Landscape and Visual				
A2.1	Construction Phase Impacts – Negative 5.35 – 5.39	Refers to limited effects of the Saxmundham and Friston substation on the SECHAONB	Construction activities will also be happening within the cable corridor. The Applicant's response does not address SCC's concerns around the underestimation of effects on the National Landscape. SCC has commented on the S.85 duty technical note at deadline 2 [REP2-062].	
A2.2	Construction Phase Impacts – Negative: Cable Corridor 5.40 – 5.41	Refers to commitment to replace removed vegetation Tree planting close to original sites, where the Order Limits allow, would be reviewed.	SCC considers that any mature tree lost to the scheme needs to be replaced at a ratio of 3:1. If this cannot be accommodated within the order limits, locations outside the order limits will need to be sought.	
A2.3	Construction Phase Impacts – Negative: Landfall Site 5.42 - 5.45	Effects are limited to those associated with the construction activity in the near shore water with the presence of a cable laying barge, not dissimilar to the presence of marine vessels which can be typically seen.	SCC is concerned that the Applicant is underestimating the adverse visual effects. Should the proposed trenchless construction methods, fail the adverse impacts on the sensitive habitats in this area could be severe.	

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		Construction around the landfall transition joint pit would be set against a backcloth of woodland and not the focus of views.		
A2.4	Construction Phase Impacts – Negative: Effects on designated and defined landscapes 5.46 – 5.58	Defends the assessment	<p>SCC considers that compounds and associated works should be assessed and that there is a difference in perception between agricultural machinery and the machinery required to install the cables.</p> <p>SCC considers that the Applicant has not addressed all points raised, for example the insufficient quantification of impacts.</p> <p>With regards to incongruous features, the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 Version Date: 21 November 2016 report, while referring only to examples of operational built form, does not exclude features of a more temporary nature.</p> <p>The definition of ‘incongruous’ is ‘not in harmony or keeping with the surroundings...’ (Oxford Languages), which SCC considers does apply to both construction compounds and construction activities. The backdrop of</p>	

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			woodland could potentially make brightly coloured machinery stand out even more and the location close to the B1122 is likely to result in higher numbers of recreational visual receptors being affected, than if the compound was located in a more remote area (notwithstanding other adverse effects this would entail).	
A2.5	Construction Phase Impacts – Negative: Potential adverse effects on landscape and visual mitigation measures of other projects 5.59 – 5.61	Tree and hedgerow loss in cable corridors in isolation is not considered to be significant, and it should be noted that the hedgerow loss is temporary only.	SCC would like to clarify that it is not comparing the vegetation loss resulting from Sea Link with that resulting from Sizewell C. However, there are considerable tree and hedgerow losses in association with Sizewell C and other projects in East Suffolk, and Sea Link is further compounding these losses, even if in much smaller quantities.	
A2.6	Operational Phase Impacts – Neutral	Tree loss has been minimised and currently reported as reasonable worst-case scenario. Detailed design will be	SCC welcomes the commitment by the Applicant to minimise tree losses and to carry this commitment through to the detailed	

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	5.63-5.66	further developed to avoid or minimise impacts to trees.	<p>design stage to further reduce tree losses, where practicable.</p> <p>SCC would welcome, if clearance pruning, as referred to in Paragraph 1.2.11 of the Arboricultural Impact Assessment [APP-294] and removal of trees and hedgerows, which might be required for the site access, would be minimised. In particular, temporary accesses and associated visibility splays should not result in the loss or harm of mature, veteran, or ancient trees. There should be flexibility in the detailed design stage and in the Construction Traffic Management Plan to locate/micro-site site accesses in such a way to avoid such features.</p> <p>SCC would like to clarify that the presence of growing tubes and stakes is not considered to dominate views in the landscape, but that this will be what visually will dominate the new hedgerows, which at Year 1 will neither look nor perform as hedgerows, so cannot be considered as a fully re-instated former land-use.</p>	

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A2.7	Operational Phase Impacts – Negative: Converter Station Site 5.67-5.71	<p>The local landscape contains a layered vegetation network which creates filtered views.</p> <p>Whilst the Applicant would support a PRoW to the south of the B1119, it has not been considered possible to incorporate this into the DCO as it would require greater rights than are being sought at present over this land. Further details in [REP1A-043].</p>	<p>SCC considers that because of the openness of the converter station site; the layered vegetation network of the wider surrounding landscape is unable to filter views from nearby visual receptors. The successful screening and filtering of views relies on the visual mitigation provided through the scheme.</p> <p>SCC considers it disappointing the scheme has been developed away from early proposals of open access land and that the Applicant does no longer seem to consider/ advocate for a PRoW along the B1119.</p>	
A2.8	Operational Phase Impacts – Negative: River Fromus Crossing 5.72-5.77	<p>The Applicant considers that there is a justifiable need for the bridge across the River Fromus to be permanent.</p>	<p>SCC considers, given the long-term significant adverse effects, that the proposed permanent access route via a permanent bridge over the River Fromus is an unnecessary and disproportionate approach. SCC's preference is for an alternative route to be implemented such as by using the consented Sizewell Link Road, as detailed in [REP1-130] such as paras 11.222 to 11.229 and [RR-5209] such as paras 3 to 9.</p>	

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			<p>If all reasonable alternative access routes are ruled out to the satisfaction of the ExA, then the bridge over the River Fromus should be made temporary to minimise identified significant adverse effects as required by the mitigation hierarchy. This approach can be facilitated by the forward deployment of Transformers and other equipment.</p> <p>The reasoning given by the Applicant lacks detail and does not justify the Applicant's position in SCC's view. The reasons given by the Applicant are dealt with in turn.</p> <p>The Applicant claims that a permanent bridge is required on account of the need for operational and maintenance traffic to avoid Saxmundham and Leiston. However, the Applicant states in [APP-054] that the level of this traffic is negligible to the extent that it was decided that it could be scoped out of the assessment. Paragraph 7.9.82 details the expected traffic as follows:</p> <p><i>During the operational and maintenance phase, the Suffolk Onshore Scheme will be</i></p>	

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			<p><i>manned by two operatives across the site (associated with the operation of the proposed Saxmundham Converter Station and Friston Substation), resulting in up to four daily car/LGV trips. There will also be additional infrequent trips associated with monthly or annual maintenance/inspections or repairs when required. Staff vehicles and those used for maintenance are primarily expected to be pickup trucks and vans, with HGVs accessing the site only rarely for the replacement of equipment. Therefore, due to the low level of trips likely to be generated, it has been agreed to scope out operational phase transport effects from the EIA (see Section 7.3).</i></p> <p>The avoidance of impacts caused by four daily car/LGV trips in addition to some infrequent trips can hardly be said to require a permanent bridge which contributes to significant adverse effects.</p> <p>SCC is not aware of AILs being identified as required for maintenance works. Detail has not</p>	

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			<p>been provided to date on how the movement of such loads would be assessed and mitigated.</p> <p>SCC does not consider the potential scenario of a transformer needing to be replaced to justify a permanent bridge. The reintroduction of a temporary bridge would, according to the Applicant, require “significant additional cost and impact.” If a mitigation measure is necessary to make a proposal acceptable in planning terms, concerns around cost does not simply render the measure unnecessary.</p> <p>Moreover, no detail to evidence the Applicant’s claim is provided in terms of the comparative financial feasibility of the temporary bridge so the point cannot yet be considered to provide any weight in supporting the Applicant’s position. Regarding the supposed significant impact forecast by the Applicant, no details of these impacts are provided, nor has the option been assessed. As such, this point similarly cannot be provided any weight against the temporary bridge option without further detail and evidence. It should be noted that any</p>	

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			<p>impacts associated with the temporary bridge and its uninstallation and reinstallation must be weighed against the adverse impact of the permanent bridge.</p> <p>The Applicant claims the reintroduction of the bridge would be “particularly problematic if Abnormal Indivisible Load access is required urgently.”</p> <p>No detail is given on the quality and extent of the supposed problematic nature of this scenario. The Applicant should demonstrate why its position is correct.</p> <p>If the reinstallation of the bridge would cause unacceptable delay to the delivery of a replacement transformer, it would not render the permanent bridge option necessary. Instead, provision should be made in the application to account for such a scenario. For instance, spare transformers could be stored onsite, as National Grid has implemented at the Willington substation¹.</p>	

¹ <https://www.nationalgrid.com/document/128971/download>

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			<p>If a temporary bridge, as opposed to a permanent one, is considered to reduce the magnitude of effect below the level of significance then it must be considered as an alternative in accordance with the mitigation hierarchy. Whilst the Applicant states that a temporary bridge was previously considered, this does not appear to be reflected in the Consideration of Alternatives document [APP-044].</p> <p>It should also be noted that the bridge, while resulting in significant landscape and visual harm in the area, does not provide any benefit to the host communities. SCC has advocated that, should there need to be a permanent crossing, this should be used to improve the local Rights of Way network, and options for landscape enhancement should be explored, but this has not been further pursued by the Applicant.</p>	
A2.9	Overarching Principles 5.89-5.90	The Key Design Principles are secured and would be discharged as set out in Requirement 3. The Outline Design	Document 7.12.1 Design Principles – Suffolk [APP-366] states in paragraphs 1.3.8 and 1.3.9 that only the Key Design Principles in Table 3.1	

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		Principles and Project Level Design Principles are not secured and are not written to be so.	<p>and Table 4.1 are secured and the rest of the document is provided for guidance only.</p> <p>Table 3.1 presents design principle for the converter station and Table 4.1 for the substation at Friston.</p> <p>For the remainder of the project area the Applicant proposes no secured design principles. SCC considers this unacceptable.</p> <p>SCC does not understand, why the Overarching and the Project Level Design Principles should not be secured within the DCO. (in particular, OA.4 Mitigation Hierarchy, OA.6 Coordination (Suffolk only), PL.2 Landscape Character, PL.3 Visual Amenity (which should include mitigative planting), etc.)</p> <p>SCC considers that a number of the Key Design Principles (as well as other design principles) remain vague as well as caveated and that they should be amended to provide greater certainty regarding what the Applicant would do, if consent was granted, not what the Applicant</p>	

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			might do. Please also see, paragraphs 5.89-5.104 SCC LIR [REP1-130].	
A2.10	Project Level Design Principles 5/91-5.96	The Applicant agrees with the requirement to reinstate planting and the mitigation of landscape and visual effects (comments on PL.2 and PL.6) but given that the Project Level Design Principles are not secured, this is not the place to secure this measure. Instead, these requirements are secured within the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]).	SCC could not find clear references in the document superseding AS-059: 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Version 2, change request) (Clean) [CR1-045] and would ask the applicant to give greater guidance as to where these principles are reflected.	
A2.11	Converter Station Design Principles- Suffolk 5.97-5.102	The Applicant considers that 'Potential Associated Activities' are correctly categorised.	SCC considers that the Potential Associated Activities explain <i>how</i> the Applicant would demonstrate adherence to the Key Principles. In SCC's view these activities are therefore an integral part of the principle and should be secured as part of the principle. The wording of the activities should be tightened up to create greater certainty.	

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A2.12	Document 6.2.2.1: Environmental Statement Part 2 Chapter 1 Landscape and Visual [APP-048] 5.112-5.115	<p>The oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]) commits to reinstatement of vegetation removal. Whilst trees that have been removed above the cable alignment cannot be replaced in situ, during the detailed design process tree planting within adjacent hedgerows where the Order Limits allow would be reviewed and included in the final Landscape and Ecological Management Plan where possible and appropriate.</p> <p>Section 2.4.16 of 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329] should be referred to with regard to the Applicant's position in relation to compensation for residual landscape and visual effects.</p>	SCC considers that the Applicant's approach to tree replacement and the potential need for compensation measures is too non-committal.	
A2.13	Document 6.10: Arboricultural Impact	The final extent of pruning will be detailed within an Arboricultural Method Statement	SCC welcomes the inclusion of Requirement 8 into the draft Development Consent Order.	

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	Assessment Part 1 of 2 [APP-294] 5.121-125	which is secured via Requirement 8 of the 3.1draft Development Consent Order.	However, there appears to be currently no provision within the draft DCO to schedule important hedgerows that are affected by the scheme. SCC considers that this should be addressed.	
A2.14	Document 2.12: Trees and Important Hedgerows to be Removed or Managed Plans [APP-036] 5.126-5.127	Important Hedgerows are assessed in the Suffolk Ecology and Biodiversity Chapter and there are measures in the Register of Environmental Actions and Commitments relating to them, notably measure B31. Important Hedgerows are mapped in ES Figure 6.4.2.2.A ES Figures Suffolk Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) [AS-028].	The query raised by SCC was in relation to non-important hedgerows, which has not been addressed in the Applicant's response.	
A2.15	Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] 5.129-5.143	Notes concern around wording within the oCoCP and REAC and will review the request to changes suggested by SCC. Applicant does not believe that the requirement of 3:1 replacement planting has been raised previously. Total area of canopy recorded by tree survey is 709,821m2 and extent of canopy	The 3:1 ratio for replacement of mature trees which are lost to development is commonly used at SCC. This principle has also been recently agreed for the National Grid project Norwich to Tilbury. Given the loss of ecosystem services provided by a mature tree and the lengthy time lag before replacement trees would offer comparable benefits, this seems like a reasonable, if not conservative approach.	

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		loss is 47,903m ² , therefore total loss equates to approximately 6.74%.	<p>While SCC welcomes the potential increase in canopy cover and woodland habitat the project offers, the gain in area is only one aspect. The timeline and targets for function, quality, and distinctiveness of the new woodland in comparison to the established woodland that may have been lost would also need to be clearly set out, in the Habitat Monitoring and Management Plan (HMMP).</p> <p>SCC considers that it is necessary to also address tree losses in numbers and not solely in canopy cover area, particularly for mature trees. Especially outside woodlands, knowing how many trees were lost and how many were planted would aid monitoring and auditing.</p>	
A2.16	Landscape and Ecological Proposals 5.146-5.148	The Proposed Project will not undermine the effectiveness of the landscape mitigation set out for the consented EA1N and EA2 DCOs.	Further comment by SCC must be reserved until the landscape proposals by SPR are published and the landscape proposals for the proposed scheme, at Friston and at Saxmundham, are submitted as separate documents.	
A2.17	Draft Development	The relevant Important Hedgerows are shown on the Trees and Hedgerows to be	SCC does not consider this sufficient and requests that a schedule is included in the	

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	Consent Order (“dDCO”) [AS087] 5.166	Removed or Managed Plans, rather than in a schedule within the draft DCO.	DCO. A schedule in the DCO would be preferable and is preceded for similar projects such as within Schedule 11 of EA2’s DCO. This would avoid confusion and make the DCO more precise as the plans cited by the Applicant do not include hedgerows categorised as non-important.	
A2.18	Document 7.5.3: Outline Onshore Construction Environmental Management Plan (“CEMP”) [AS-127] 5.168-5.174	Adaptive management measures are committed to in the oLEMP, the detail of which will be developed further post determination in the full LEMP	SCC considers that the measures presented in the REAC and CoCP need to align and be cross-referenced with the oLEMP and full LEMP, and that discrepancies need to be addressed.	
A2.19	Management periods 5.158	Five years of aftercare for the reinstatement planting is considered appropriate by the applicant. This planting would be managed for the lifetime of the project.	SCC considers a 5-year aftercare period for woodland features as insufficient. This aftercare period needs to be at least 10-15 years, given the time it takes for trees to reach maturity.	

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A2.20	Implementation of native planting 5.161	Hedgerows will be maintained at a height of 2.5-3.5m	SCC Ecology questions the need to maintain the height of the hedgerows to the stated dimensions (unless it is for visibility/access purposes).	

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Table A3 – 4.1 Applicant’s Comments on Chapter 6: Ecology and Biodiversity				
A3.1	Construction phase impacts – negative 6.18	Prior to any works being undertaken on the bridge, a bat roost assessment of the bridge will be undertaken to assess the presence/likely absence of bats in the bridge.	The areas of continuous vegetation on the embankments either side of the line provide excellent migration and foraging opportunities for bats. If this vegetation is to be anyway impacted by works to the bridge, the impacts on bats resulting from any vegetation loss will need to be assessed in terms of impacts on foraging/migrating bats. SCC Ecology are keen to see bat activity surveys carried out in this area (if they have not been already)	
A3.2	Construction phase impacts – negative. 6.18	The scrub on the railway embankment is suitable for badgers. Further surveys will be required prior to works commencing.	SCC Ecology welcomes the commitment to further badger surveys in the area surrounding Benhall Bridge prior to any works taking place at this location.	
A3.3	Decommissioning phase impacts. 6.25	The applicant can confirm there will be no works taking place on the vegetated shingle habitat.	SCC Ecology makes note of this comment.	
A3.4	Acid grassland restoration and enhancement	The acid grassland restoration and enhancement will be maintained for 10 years as it is mitigation for the temporary loss of acid grassland. This area should	SCC Ecology still query why this area of grassland will be maintained for only 10 years and not in perpetuity in line with the other areas of habitat that will be delivered in the BNG	

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	6.36	have returned to a suitable condition before the ten years of maintenance has ended.	commitments from the applicant. What will happen to this area of acid grassland should the condition start to deteriorate once the ten-year maintenance period has ended?	
A3.5	Environmental Statement – Non-technical summary 6.53	With regard to the record of a part-built dormouse nest being recorded close to Benhall Bridge, the applicant has identified the need for further dormouse surveys in this area prior to any vegetation clearance works happening.	SCC Ecology welcomes this approach, particularly as there is another record of a dormouse nest from this area. This record is 8-10 years old but was verified by the People's Trust for Endangered Species (PTES).	
A3.6	Environmental Statement Appendix 2.2B - Overwintering Bird Survey Report 6.62	The last wintering bird survey was undertaken in 2023/2024, and the applicant identifies the need for further surveys prior to any pre-construction works taking place.	SCC Ecology welcomes this commitment, particularly with regard to potential impacts on overwintering birds at the RSPB North Warren site which is close to the landfall site.	

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Table A4 – 5.1 Applicant’s Comments on Chapter 7: Cultural Heritage				
A4.1	General comments regarding ‘Applicant’s comments on Local Impact Report.’	Updated OWSI will be submitted after a final review from SCCAS and Historic England before the end of the examination period.	<p>SCCAS are pleased that the applicant has committed to updating the Outline Onshore OWSI - Suffolk [APP-343] in line with the comments set out within the Suffolk County Council Local Impact Report (REP1-130) paragraphs 7.83-7.132.</p> <p>SCCAS are also pleased that the applicant has noted the advice which was set out within the Local Impact Report (REP1-130) relating to the need for the applicant to update DCO Requirement Wording 14 and the Part 4 Supplemental Powers, and that they have stated that they will consider this advice when drafting the next iteration of the DCO document.</p> <p>Detailed comments regarding suggested appropriate wording can be found in the Suffolk County Council Local Impact Report (REP1-130) in section 7.138-7.144. The suggested wording is in line with the wording of the approved Sizewell C DCO, which is currently being implemented with great success with</p>	

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			regards to both securing appropriate archaeological mitigation whilst meeting project delivery requirements.	

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Table A5 – 6.1 Applicant's Comments on Chapter 8: Water Environment				
A5.1	Document 6.8: Flood Risk Assessment [APP-292]	The applicant noted LLFA comments regarding infiltration and will work with SPR to review recent infiltration testing.	<p>The LLFA believe that the worst-case scenario of impermeable area should be taken. Without infiltration testing and a detailed construction cross section, the permeability of the chipped surface cannot be determined.</p> <p>SCC acknowledges that the Applicant will provide a SuDS solution at the construction stage, but the LLFA will require detail of the proposed temporary drainage systems to be approved prior to construction.</p>	
A5.2	8.21 Operational Phase Impacts - Negative	Operation of the proposed substation would not increase surface water flood risk to downstream areas including Friston.	<p>SCC acknowledges the Applicant's assessments. However, detail at this stage is indicative and an approved surface water drainage management plan for the entire Suffolk Onshore Scheme must be submitted to and approved by the LLFA prior to commencement to ensure the Applicant's claim that surface water flood risk does not increase.</p> <p>Any areas which crossover with SPR consented DCOs, Sea Link shall mimic that approach – i.e.</p>	

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			Kiln Lane substation. SPR have now submitted their operational drainage management plan for the substation site for the approval of the LLFA ²	
A5.3	8.25 Decommissioning Phase Impacts - Negative	Decommissioning of the project would be undertaken in accordance with good practice at the time of decommissioning.	Detail must be provided prior to decommissioning of surface water drainage management to prevent flooding. Will have to provide this prior to decommissioning.	
A5.4	8.26 Infiltration potential	SPR and the Applicant are liaising extensively on the design, layout, and drainage of the Friston site. The Applicant is not intending to take a different approach to drainage of the site to that proposed by SPR.	The Council's representation was made regarding the converter station site. However, the Applicant answered in relation to the substation site. Therefore, the Council's point regarding the converter station site remains unanswered. SCC continues to recommend that the Applicant explore opportunities for infiltration for the Converter Station at the earliest opportunity	
A5.5	8.28 Haul Road drainage design	A response to LLFA comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to	SCC considers this matter addressed by the Applicant in their cited response.	

² <https://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0191%2F25%2FDoR%2FEA1N#undefined>

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		Relevant Representations identified by the ExA [REP1A-043].		
A5.6	8.29 Avoiding pluvial flood risk	A response to LLFA comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].	Whilst the new national flood maps have been used for pluvial flood risk, they only appear show the predicted flood risk now and have not shown the predicted pluvial flood maps with climate change applied	
A5.7	8.30 Managing intercepted flows	A response to LLFA comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].	The document cited by the Applicant does not appear to address this point. The text appears as RR 51 in that document, but the Applicant's response only appears to address RR 50. Therefore, this point has not been addressed by the Applicant	
A5.8	8.31 Friston sensitivity	A response to LLFA comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].	The Flood Risk Assessment uses the latest available data which adequately reflects the Flood Risk sensitivity of the Friston area, and the assessment clear demonstrates that there will be no increase in surface water flood risk as a result of the proposed development. Therefore, SCC considers this point to be addressed.	

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A5.9	8.32 Substation flood risk concerns	<p>SPR and the Applicant are liaising extensively on the design, layout, and drainage of the Friston substation site. The Sea Link Order Limits are wide at the Friston site and contain significant areas that could be utilised for drainage and mitigation. Drainage works were not previously included as an individual ‘work’ in the original application so were not shown on the Works Plans. In part to clarify the areas for works at Friston, the Works Plans have been updated (see Application Document 2.5.1 B (version 2) Works Plans – Suffolk [CR1-007] and drainage is now presented as Work No. 13. This update should provide reassurance over the extensive area available for the implementation of drainage at the site. This provides ample space for drainage of Friston Substation and all associated works should these works be constructed under the Sea Link application.</p>	<p>Point addressed. Having reviewed the present status of the Application, based on the information available, there appears to be sufficient space in the order limits for drainage mitigation around the Kiln Lane substation</p>	

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A5.10	8.35 Missing watercourses		There is no response to this. SCC continues to consider that several ordinary watercourses are missing from the plans and that these should be included.	
A5.11	8.37 Drainage sizing clarity	Further information regarding the methodology for sizing drainage features (permanent and temporary), with supporting calculations will be provided by the Applicant.	SCC welcomes that the Applicant will provide this information. SCC expects that this should be provided during the examination with sufficient time for the Council to review.	
A5.12	8.40 Plans and Drawings	A response to LLFA comments is provided in Table 2.1.6 of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].	SCC understands that the EA1N and EA2 projects do not need to go up to this culvert which means SCC is satisfied for Sea Link not to do so. Should full infiltration be feasible then use of the culvert would not be necessary.	
A5.13	8.41 Document 2.11: Water Bodies in the River Basin Plans [APP-035]	Application Document 2.11 Water Bodies in the River Basin Management Plans (Version 2, change request) [CR1-022] is intended to illustrate water bodies that are designated and monitored under the Water Framework Directive. The Friston river is not such a	Friston river is designated as a main river and is managed by the EA as such. This should be recognised and clarified that it is not considered to be an ordinary watercourse.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		water body and therefore is not included in the plan.		
A5.14	8.42 Document 2.13: Design and Layout Plans [APP-037]	The typical construction swathes are not location specific which would be required to size the drainage channels for any given return period. The overall construction swathes have been produced with sufficient flexibility to accommodate increased drainage attenuation capacity. Noting that attenuation is primarily provided by attenuation and infiltration ponds provided along the construction corridor as indicated on the Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038]	A construction surface water drainage management plan should be produced to include the finalised details.	
A5.15	8.43-8.44 Document 2.14.1: Indicative General Arrangement Plans [APP-038]	Further information regarding the methodology for sizing drainage features (permanent and temporary), with supporting calculations will be provided by the Applicant. Outfall locations are provided on the Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk [APP-038], refer to key for 'Proposed drainage – temporary outfall' and 'Proposed drainage – permanent outfall'.	SCC welcomes that the Applicant will provide this information. SCC expects that this should be provided during the examination with sufficient time for the Council to review.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A5.16	8.53 Document 6.8: Flood Risk Assessment [APP292	The Applicant agrees that if it is technically possible, the drainage system will infiltrate all runoff from the impermeable areas of the proposed substation. The Applicant is working with SPR to review the recent infiltration testing to confirm the technical feasibility of this option.	<p>8. detail at this stage is indicative and an approved surface water drainage management plan for the entire Suffolk Onshore Scheme must be submitted to and approved by the LLFA prior to commencement to ensure the Applicant's claim that surface water flood risk does not increase.</p> <p>Any areas which crossover with SPR consented DCOs, Sea Link shall mimic that approach – i.e. Kiln Lane substation. SPR have now submitted their operational drainage management plan for the substation site for the approval of the LLFA³</p>	
A5.17	8.60 Document 6.8: Flood Risk Assessment [APP-292]	50% of the Converter and Substation footprints have been considered as impermeable as they will be formed of buildings and roads, the granular and chippings surface of the rest of the site is considered permeable. Runoff from these permeable areas will match or improve on existing green field runoff rates due to the	Impermeable granular and chippings surface is not permeable as claimed by the Applicant. Therefore, the Applicant's claim that 50% of the footprints of the sites is permeable is not accurate. Not addressed	

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		attenuation of the runoff within the compound buildup.		
A5.18	8.68 Document 6.2.1.4: ES Part 1 Introduction Chapter 4 Description of the Proposed	The Applicant requests clarity on what other documents this should be included in and for what purpose	The documents referred to by SCC would relate to soils, construction earthworks, material handling, stockpile handling, construction surface water management drainage, pollution, and other relevant control documents. This would include the Soil Management Plan, Materials and Waste management plan and others such as the Construction Environmental Management Plan.	
A5.19	8.80 Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]: Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	Excerpts of the flood mapping produced by the BMT study are provided within Application Document 6.9 Flood Risk Assessment [APP-292], which also present surface water mapping based on NaFRA2 for the construction and operational stages of the Project.	The referenced items appear not to have been included with the FRA. The Applicant must also include the future 2040-2060 epoch pluvial flood maps.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A5.20	8.85 Document 6.4.2.4: ES Part 2 Suffolk Chapter 4 Water Environment – Figures [APP-231]; Surface Water Flood Risk Suffolk Onshore Scheme Figure 6.4.2.4.3	More detailed plans are provided in Application Document 6.9 Flood Risk Assessment [APP-292], which present surface water mapping based on NaFRA2 for the construction and operational stages of the Project.	The proposed red line boundary of the application has areas at risk of surface water flooding. Whilst the applicant has shown that the developed areas are to be in low-risk surface water flood areas, it is noted that the Applicant has applied the sequential/exception test.	
A5.21	8.88 Document 7.5.3.1: Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]	As stated in this commitment, the bullet point list of topics is not exhaustive. Correct storage of materials and soils is good practice and commitments to these good practices are secured via measures AS01 and GH05 within Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102].	Resolved, but additional comment - LLFA requires justification for proposed permanent culverts on any non-main river and a plan showing that during the event of blockages the water can flow over the crossing and back into the watercourse without increasing flood risk elsewhere.	

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Table A6 – 7.1 Applicant’s Comments on Chapter 9: Geology and Hydrology				
A6.1	Management of minerals – recycling and prevention of waste.	As identified in commitment GG22 in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043], a Material and Waste Management Plan will be submitted to and approved by the local planning authority prior to construction as secured by Requirement 6 in the draft DCO. The commitment specifies that the plan will set out, in an auditable manner, how waste will be reduced, reused, managed, and disposed of in accordance with the waste hierarchy. This will include minerals excavated on site.	<p>The Applicant must ensure minerals are reused where possible and not simply taken off site and treated as waste. Taking minerals offsite and importing unnecessarily would also generate unnecessary additional vehicle movements.</p> <p>The Council also does not see how sterilisation of minerals resources has been minimised. A significant proportion of the Order Limits are within the Minerals Safeguarding Area, and the Council does not see how the Applicant can consider the affected minerals deposits to not be of economic value. As such, measures should be explored to minimise adverse impacts on minerals deposits.</p> <p>If the project falls into disuse, then land should be restored to previous condition and all pieces of infrastructure removed to ensure future minerals extraction is not compromised.</p> <p>Following the waste hierarchy, the Applicant should seek for any materials to be disposed to</p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			be instead reused by other developments through coordination.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
Table A7– 9.1 Applicant’s Comments on Chapter 11 Traffic and Transport (including Public Rights of Way)				
A7.1	11.91 iv. and 11.208 - 11.209 Lack of breaks in construction with seven days a week working.	The proposed management and mitigation relating to Public Rights of Way is set out within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352] which has been submitted in outline form to specify the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding PRoW network. A detailed PRoW Management Plan will be developed in accordance with the outline plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO.	<p>SCC has significant concerns regarding the impact of the proposed working hours on public health and wellbeing, as they would leave local communities with little respite from construction related noise, vibration, traffic, and disruption.</p> <p>When considered in association with overlapping NSIPs in the region, there is likely to be a substantial impact on mental health and wellbeing.</p> <p>The additional core working hours (7am – 5pm on Sunday and Bank Holidays) is likely to affect local tourism due to the impacts on the PRoW network and roads used for recreational</p>	

			purposes at times when they are most frequently used.	
A7.2	11.211 -11.212	In Part 2 Suffolk Chapter 10 [APP-057], paragraphs 10.9.35, 10.9.56, 10.9.63, 10.9.69, 10.9.76, 10.9.79, 10.9.88, the Applicant states for several PRowS, up to 20 HGV movements an hour to not be significant. This equates to approximately one every 3 minutes. SCC PRow does not consider that this is not significant especially on bridleways, where horses, pedestrians and cyclists will be using the routes. The British Horse Society guidance on construction sites and horses (see Appendix 14) highlights horses' reactions to machinery and new things and supports SCC's concerns on the 20HGVs per hour on PRowS, especially bridleways.	SCC PRow does not consider this to be fully addressed. The 20HGV movements per hour is the worst-case scenario and being reduced to 38 per day. The applicant's response does not address how they came to that figure. can this be clarified and justify why this is not a significant impact?	
A7.3	11.231 - 11.249	Public Rights of Way mitigation and compensation	These points have not been fully addressed and are still outstanding. SCC does not see a good reason why it is not being considered.	
A7.4	11.272	This is not acceptable as a method of considering the PRow and the Definitive Map should have been acquired from the	SCC has repeatedly requested that the applicant applies to the SCC definitive map team for the most up to date and correct	

		definitive map team and correctly plotted. As incorrect assumptions on the definitive route, as opposed to assumed locations based on walked routes and desk top studies may lead to orders being invalid.	information, they can also set out other issues and maps not available online yet. The applicant can apply to do this on the links they have included in their response.	
A7.5	11.274	There is mention of use of a quad bike on the PRow footpath, is the path suitable for use of a motorised vehicle, if not then we recommend that footpath E-103/006/0 to be resurfaced for its length.	The applicant has not directly responded to this point. SCC PRow requires reassurance that any routes to be assessed by a motorised vehicle is accurately assessed with regards to the suitability of the surface, prior to assessing the route and with prior agreement with SCC PRow. This should also be addressed and included in the PRow MP. This is to ensure that no PRow and surface is left in a lesser condition than prior to surveying.	
A7.6	11.279	Traffic and Transport in terms of PRow closures and diversion, does not address mitigation or effects if the schemes cannot be co-ordinated. Moreover, the Applicant's coordination document [APP-363] does not address how PRow management will be coordinated with the EA1N and EA2 projects. Therefore, it cannot be assumed that there will be no significant cumulative effects. Other sections state that cumulative receptors will have a moderate	Does not appear to be addressed with regards to coordination. We note the commitment and increased co-ordination, but question reliance that effect will not be sufficient as raised in deadline 2 submission REP2-062 table 6. All closures and diversions should be kept to the absolute minimum. This should also be mentioned in the PRow MP with regards to the impacts if the works cannot be undertaken in a coordinated approach with other schemes, or those works have progressed and their closures	

		effect, but if co-ordinated then it is minor. Provision should be included in the application for additional mitigation or compensation measures if the coordination claimed in this assessment does not come to fruition during delivery.	and diversions are no longer in place, meaning that PRow users will be impacted again!	
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Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
Table A8 – 10.1 Applicant’s Comments on Chapter 12: Air Quality				
A8.1	Construction vehicle emissions 12.12 – 12.18	Health impacts from long- and short-term exposure to air pollution noted. Applicant reconfirms that their modelling concludes construction vehicle emissions from the Proposed Project are negligible.	An increase in traffic will lead to an increase in harmful pollutants. From a Public Health perspective, we do not have the expertise to comment on technical elements such as emissions modelling so will defer to East Suffolk Council on whether the increase in emissions from construction traffic has been accurately reflected in the Application Document 6.2.2.8 Suffolk Air Quality (Chapter 8). We will however continue to emphasise that pollution, even at low levels and on a temporary basis, can impact health and we therefore expect to see every effort made to keep levels as low as possible to protect the health and wellbeing of local communities.	[APP-055]
A8.2	World Health Organisation Air Quality Guidelines 12.12 – 12.18	Applicant confirms the air quality assessment for the Proposed Project has been conducted in accordance with the current legal requirements and relevant guidance, ensuring that all statutory obligations are met.	Public Health are clear that the project is compliant with the current statutory Air Quality Objectives. However, it would be remiss for the World Health Organisation guidance to not be referenced (and re-referenced here) as its primary purpose is to protect public health as opposed to consider what is achievable.	

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			<p>In response to the growing body of evidence suggesting that the Statutory Air Quality Objectives are not enough to protect health, SCC would like to see an emphasis not just on complying with the Statutory Limits but on bringing air pollution levels down as low as possible for the health and wellbeing of our residents.</p> <p>Air pollution levels nationally are on a downward trend, should monitoring of pollution levels associated with this project show pollution levels increasing, even within Statutory Limits, it is recommended that remedial action is taken to ensure the levels of pollutants in the air continue to fall.</p>	
A8.3	Working hours 12.12 – 12.18	Applicant concludes no significant effects are anticipated with the inclusion of working hours on Sundays and Bank Holidays.	<p>Public Health does not concur with this conclusion and reiterates points raised in the SCC Local Impact Report regarding working hours.</p> <p>The Applicants response addresses the socio-economic, recreation and tourism effects but makes no reference to the mental health or well-being impacts (addressed further in health</p>	[REP2-026]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			<p>and wellbeing section below) exacerbated by concurrent NSIPs in close proximity.</p> <p>Whilst the Applicant makes reference to the proposed number of HGV movements being lower on Sundays and Bank Holidays it does not address the lack of respite from increased traffic and subsequent emissions.</p>	

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Table A9 – 11.1 Applicant's Comments on Chapter 13: Socioeconomics, Recreation and Tourism				
A9.1	13.21-13.23 Local supply chain and economic impact	The Applicant intends to work closely with the Council and its contractors to develop a Social Value strategy. The Applicant has not committed to a dedicated Employment, Skills, and Education Strategy due to the perceived limited scale of construction employment impacts. The Applicant is exploring collaboration opportunities.	<p>The Council welcomes the Applicant's stated intention to work collaboratively and to develop a Social Value Strategy. However, the Council remains concerned that the absence of a project-specific Employment, Skills and Education Strategy, as part of the DCO submission, represents a risk with regards to securing meaningful socio-economic benefits and mitigate cumulative impacts. The Council does not consider reliance on contractor-level commitments alone to be sufficient or proportionate given the scale of concurrent NSIP activity in Suffolk.</p> <p>The Council considers that collaboration must move beyond high-level intent to binding commitments, secured through appropriate control documents. The Applicant should work proactively with SCC and the RSCF to ensure that Sea Link delivers measurable socio-economic benefits, mitigates cumulative risks, and leaves a positive legacy for Suffolk's communities and businesses.</p>	<p>Energy and Climate Adaptive Infrastructure Policy, The Socio-economic Effects of NSIPs Supplementary Guidance</p> <p>EN-1 (Paragraphs 5.13.4 and 5.13.11)</p>

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			<p>The Council supports the Applicant's exploration of links with Sizewell C's College on the Coast and expects this to form part of a wider, structured approach to skills development across Suffolk's energy cluster. Coordination should extend to other NSIPs to minimise cumulative impacts and optimise shared investment in training infrastructure.</p>	
A9.2	13.24- 13.26 Localisation of economic benefits	The Applicant's Environmental Statement applies a multiplier of 1.5 and assumes 50% displacement and 70% leakage when calculating net additional employment and GVA.	<p>The Council remains concerned that these headline figures do not address the fundamental issue of localisation of benefit. The Environmental Statement does not define the geography of indirect and induced impacts, nor does it propose measures to maximise local economic integration. A 70% leakage rate and the absence of a structured intervention plan effectively confirm that the majority of benefits will accrue outside Suffolk.</p> <p>The Council's Supplementary Guidance on Skills, Workforce and Supply Chain (January 2025) is clear that socio-economic modelling</p>	

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			must be accompanied by a governance framework and proactive strategies to convert theoretical multipliers into tangible outcomes for local communities. Employment and GVA projections alone do not deliver inclusive growth. Without early engagement and binding commitments, the risk of high leakage and workforce displacement will persist, undermining Suffolk's ability to secure a skills legacy and supply chain growth.	
A9.3	13.53- 13.59 Construction Phase Impacts – Tourism - Negative	The Applicant acknowledges the importance of the local tourism economy and the concerns raised by SCC regarding potential cumulative impacts from multiple Nationally Significant Infrastructure Projects. To address concerns, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] of the Environmental Statement assesses the cumulative impact of Sea Link in addition to other Nationally Significant Infrastructure Projects. The assessment	The Council continues to consider that it has not been demonstrated that there will be no significant cumulative effects in relation to tourism as detailed in the Council's submission at the previous deadline [REP2-062]. There should be a stronger commitment to community liaison which not only informs businesses but also seeks their views on how tourism impacts can be minimised such as through the phasing of works to avoid impacts on tourism receptors at peak times. This could be achieved through proactive communication and collaboration the Local	

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		<p>of inter-project cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socioeconomic, recreation and tourism receptors. Impacts on residential receptors, business premises, community facilities, visitor attractions, development land, PRow, and recreational routes are assessed within a 500 m Study Area from the Proposed Project's RLB. Impacts on employment generation, GVA, tourist accommodation, local labour supply and social infrastructure were assessed within a 60-minute drive time of the Suffolk Onshore Scheme. The chapter concludes that no significant effects are expected when considering the impacts of the interproject cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant remains</p>	<p>Destination Management Organisation ("DMO") and the Local Visitor Economy Partnership ("LVEP") Detail should also be provided on how members of communities and businesses are kept informed. Further detail should be provided on how coordination will be sought with cumulative development during the delivery phase and how this is secured in the DCO.</p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		committed to minimising disruption and has proposed a series of embedded measures set out in Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341], such as GG27 commits to keeping members of the community and local businesses informed regularly of works through active community liaison.		
A9.4	13.80-13.84 Required mitigation	The Applicant states that a full socio-economic assessment has been completed and concludes there are no significant effects, so no mitigation is required. Consequently, they have not committed to an Employment, Skills, and Education Strategy, considering it inefficient given the limited construction workforce and lack of significant employment impacts.	The Council acknowledges the Applicant's statement that the Environmental Statement concludes no significant socio-economic effects and therefore proposes no mitigation. However, the Council strongly disagrees with this position. The absence of significant effects in the ES does not remove the Applicant's responsibility to deliver positive provisions under EN-1 Paragraphs 5.13.4 and 5.13.11, which require consideration of job creation, training opportunities, and legacy benefits. The Council's Supplementary Guidance sets clear expectations that project promoters must go beyond baseline	EN-1 Paragraphs 5.13.4 and 5.13.11 Energy and Climate Adaptive Infrastructure Policy, The Socio-economic Effects of NSIPs

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			<p>mitigation and actively support inclusive growth.</p> <p>The Council considers the decision not to prepare an Employment, Skills, and Education Strategy at project level to be unacceptable. While the Applicant cites efficiency concerns, this approach fails to recognise the cumulative NSIP context in Suffolk, where overlapping construction peaks from other projects will create unprecedented pressure on labour markets and training capacity. Without structured intervention, the risk of workforce displacement, high leakage, and negative churn will undermine local businesses and the wider energy cluster.</p>	Supplementary Guidance

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Table A10 – 12.1 Applicant’s Comments on Chapter 14: Health and Wellbeing				
A10.1	EMF 14.44	Impact of surface infrastructure and underground cables in respect to Electromagnetic fields	The Applicants response refers to Table 1.11 (Reference ESC – Mental Health and Wellbeing) and Table 1.12 (Reference ESC – Compensation) of [REP1A-043] which appear to be incorrect. Regardless, the parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.	[REP1A-043]
A10.2	Temporary workforce 14.45	Temporary workforce, with a portion anticipated to be filled by residents within the study area.	No comments necessary	
A10.3	Pressure on housing and community services 14.46	The predominance of non-local workers could place additional pressure on housing and community services.	Public Health notes the Applicant’s response as detailed in [REP1A-043] ref 118-119 of table 2.11 and is reassured by the commitment to discuss concerns around visitors and tourism accommodation with the appointed contractor. However, Public Health would	[REP1A-043]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			expect the Applicant to actively monitor impacts on local visitor and tourism accommodation capacity throughout construction and should monitoring identify that accommodation capacity is being stretched or exceeded, we expect the Applicant to consider and implement appropriate alternative arrangements to mitigate adverse impacts to local communities and services.	
A10.4	Construction traffic 14.47	Construction traffic and abnormal loads may also affect travel routes used by local businesses, leading to congestion, delays, and reduced accessibility for customers and suppliers. Businesses situated close to the Order Limits may experience both opportunities and challenges, benefiting from increased demand for accommodation and local services, but also facing potential disruption from noise, access changes, and short-term impacts on amenity.	Public Health notes the Applicant's response within [REP1A-043] ref 115 of Table 2.11 concluding of the socioeconomics and health and wellbeing assessments that no significant effects are anticipated. However, Public Health contend that construction traffic, abnormal loads, and associated construction activity have the potential to result in localised and short-term impacts on businesses, particularly those located close to the Order Limits.	[REP1A-043]
A10.5	Community amenity	Temporary or permanent closures, diversions, or reductions in amenity and	No comments necessary	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
	14.48-49	access to social infrastructure, the PRow network and green and blue spaces, combined with increased traffic, noise, and other construction related disturbances, have the potential to adversely affect community health and wellbeing.		
A10.6	Community severance 14.50	Community severance between neighbourhoods, reducing access to community facilities and social interaction.	No comments necessary	
A10.7	Construction impacts and working hours 14.51	Effects are expected to be exacerbated by the proposed lengthy working hours, including activities on Sundays and Bank Holidays, which limit opportunities for rest and leisure. Moreover, when considered alongside the cumulative influence of other NSIPs already underway or planned in the locality, the potential for sustained stress, fatigue, and erosion of social cohesion is likely to be greater than the assessment currently suggests. SCC therefore considers that residual impacts on wellbeing, social cohesion, and mental	<p>The Applicants appears to respond to this comment in table 2.14 reference 135 as opposed to Table 2.12 reference 137.</p> <p>We note the Applicants comments, specifically that <i>construction noise level threshold for potential significant effects is lower during weekend and bank holiday daytime periods, compared to weekday and Saturday morning working periods</i> and concerns that shortening working hours could extend the project delivery. Public Health maintains the position that project delivery timescales should not take precedence over the protection of human health and wellbeing. We consider that the</p>	[REP1A-043]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		health may be understated in the Applicant's conclusions.	Applicant's assessment understates the potential impacts of prolonged construction working hours on community wellbeing and, as currently proposed, presents a material risk to residential amenity and mental health.	
A10.8	Community access to healthcare services 14.52-14.55	SCC considers that construction-related disruption to access to healthcare services, particularly during peak periods and extended working hours, could have greater real-world impacts on community health and wellbeing than the Applicant's assessment suggests, especially for vulnerable and rural populations and in the context of cumulative pressures from other NSIPs.	Public Health notes the Applicant's response and the conclusions of the health and wellbeing [APP-058] and cumulative effects assessments [APP-060], which identify no significant effects. However, Public Health maintains its position that the assessment conclusions rely on assumptions regarding duration of disruption, baseline service capacity, and resilience of access routes which may not fully reflect local conditions, particularly in rural areas or where multiple NSIPs are constructed concurrently. As set out in the LIR, even short term or localised disruption to healthcare access can have disproportionate impacts on vulnerable groups and contribute to stress and anxiety within affected communities.	[APP-058] [APP-060]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A10.9	Public mental health, social cohesion, and community identity 14.56-14.57	Mental health and wellbeing of local residents, social cohesion, and community identity.	The Applicants response refers to Table 2.12 References 135 and 136 [REP1A-043], however these references, found in Table 2.14 and 2.15 respectively do not relate to health and wellbeing, but construction working hours and SFRS matters.	[REP1A-043] [App-058] [APP-060]
A10.10	Construction working hours 14.58-14.60	The proposed construction working hours, as currently set out, would allow activities from as early as 07:00 -19:00 on weekdays plus a provision for start-up and close-down activities up to 1 hour either side of these core working hours, and from 07:00 – 17:00 on weekends and bank holidays. This leaves local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption.	<p>The Applicants appears to respond to this comment in table 2.14 reference 135 as opposed to Table 2.12 reference 137.</p> <p>Public Health welcomes the commitment to mirror the working hours agreed for the Scottish Power Renewables project at the Friston substation site. However, Public Health’s concerns regarding community respite, weekend and bank holiday working and the potential mental health and wellbeing impacts associated with extended construction hours appears not to have been addressed in full. Public Health therefore maintains our view as represented in the LIR and Reference no. 11.7 above.</p>	[REP1A-043]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A10.11	Cumulative impacts 14.61-14.64	SCC considers that the Applicant's cumulative impact assessments underestimate the real world social and psychological effects of multiple infrastructure projects, as prolonged disruption, uncertainty, and repeated construction activity can exacerbate mental health impacts and reduce community cohesion, particularly for vulnerable residents.	The Applicants response refers to Table 2.12 Reference 136 [REP1A-043], however there is not a reference 136 within Table 2.12. There is a reference 136 within Table 2.15 but this relates to SFRS matters.	[REP1A-043]
A1.12	Community engagement 14.65–14.66	SCC consider it essential for promoters to adopt a collaborative approach, involving the community meaningfully in the design and delivery of the project.	The Applicants response refers to Table 2.12 Reference 132 to 134 and 138 to 140 of [REP1A-043], however the references are not present within Table 2.12. References 132 to 134 and 138 to 140 are present under Tables 2.13, 2.14, 2.16 and 2.17 relating to topics of Air Quality, Noise & Vibration, Emergency Planning and DCO, but not relating to Community Engagement.	[REP1A-043]
A10.13	EMF 14.68	Operational impacts related to Electrical infrastructure with associated Electrical and Magnetic forces	No comments necessary	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A10.14	Public Mental Health 14.72-74	The operation of the Proposed Scheme may continue to exert influences on the mental health and wellbeing of local residents and communities. Once operational, changes to the local environment such as visual intrusion, maintenance traffic movements, lighting, and changes in local air quality may alter residents' sense of place, comfort, and security.	<p>The Applicants refers to responses with references 135, 136, 132 to 134 and 138 to 140 in Table 12</p> <p>References 135 and 136 are not present within Table 2.12. There are reference 135 and 136 within Tables 2.14 and 2.15 but these relate to Noise and Vibration and SFRS matters that do not appear relevant to health and wellbeing.</p> <p>References 132 to 134 are present under Tables 2.13, 2.14 and relate to Air Quality, Noise and Vibration but the comments and do not appear relevant to health and wellbeing.</p> <p>References 138 to 140 are present under Tables 2.16 and 2.17 relating to topics of Emergency Planning and DCO and do not appear relevant to health and wellbeing.</p>	[REP1A-043]
A10.15	Local employment 14.82-14.85	SCC believe the Applicant should develop and implement a Local Employment and Skills Plan prepared in collaboration with SCC	Public Health notes the Applicant's willingness to engage collaboratively and to develop a Social Value strategy with its main works contractors. This is welcomed; however Public Health maintains that a specific, project level Local Employment and Skills Plan is necessary to ensure measurable, transparent	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			commitments to prioritise local labour, deliver targeted skills, training, and apprenticeship opportunities and provide a robust monitoring and reporting framework.	
A10.16	Access and use of PRowS and social infrastructure 14.86-14.88	SCC recognises that even with the proposed measures in place, there will be an unavoidable residual negative impact on local access, amenity, and community wellbeing relative to the existing baseline	The Applicants response refers to Table 12.2 References 135 and 137 of [REP1A-043]. References 135 and 137 are not present within Table 2.12. There are references 135 and 137 within Tables 2.14 and 2.15 but these relate to Noise and Vibration and SFRS matters that do not appear relevant to health and wellbeing.	[REP1A-043]
A10.17	Impact of restricted access to health infrastructure 14.89-14.92	SCC expects the Applicant to implement, monitor, and coordinate mitigation measures across relevant plans to minimise disruption to healthcare access, including engagement with communities and providers, temporary access arrangements, and coordination with other NSIPs.	The Applicants response refers to Table 2.2 Reference 37 and Table 2.12 Reference 136 of [REP1A-043]. Table 2.2 reference 37 does not appear relevant to the topic, focussing on cumulative effects and LionLink. Reference 136 is not present within Table 2.12. There is a reference 136 within Table 2.15 but this relates to SFRS matters that do not appear relevant to health and wellbeing.	[REP1A-043]

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A10.18	Public Mental Health 14.93-14.95	To effectively mitigate the effects of prolonged construction disturbance on community wellbeing, SCC expect the Applicant to revise the proposed core working hours to minimise avoidable noise, vibration, and disruption and protect public mental health.	<p>The Applicants response refers to Table 2.11 Reference 137 [REP1A-043], however there is not a reference 137 within Table 2.11.</p> <p>Public Health welcomes the commitment to mirror the working hours agreed for the Scottish Power Renewables project at the Friston substation site. However, Public Health maintains its concerns regarding community respite, weekend and bank holiday working and the potential mental health and wellbeing impacts associated with extended construction hours and therefore maintains its position that Construction activity should be limited to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC. Start-up and close-down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses.</p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A10.19	Community engagement 14.96	SCC considers that whilst the REAC [APP-342] commitment to community liaison is welcomed, it is insufficient to address the full range of wellbeing and mental health impacts, and therefore expects the Applicant to implement a comprehensive community engagement and wellbeing programme, including a dedicated relationship manager, regular face to face engagement, investment in local assets, support for mental health, early and continuous participation, clear information on compensation, and ongoing monitoring and adaptive management in line with SCC's Supplementary Guidance Document on Community Engagement and Wellbeing.	The Applicants response refers to Table 2.12 References 136, 132 to 134 and 138-140 of [REP1A-043]. However, the references are not present within Table 2.12.	[APP-342]
Table A11 – 13.1 Applicant's Comments on Chapter 15: Draft Development Consent Order				
A11.1	15.71 Schedule 4 (discharge of requirements) (paragraph 1, timescales)	The Applicant acknowledges these comments regarding the timescales in Schedule 4 of the Application Document 3.1(E) draft Development Consent Order [REP1-036]. However, the Applicant considers that the	The Council continues to disagree with the Applicant's position regarding timescales in Schedule 4 of the DCO. Whilst the Council welcomes that the Applicant will enter into a Planning Performance Agreement, it should be	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		<p>time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) 2024.</p> <p>However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.</p>	<p>noted that this would not necessarily ensure the Council is able to respond on programme. PPAs provide cost-recovery but they do not provide for costs beyond that. This means that the Council may not be able to fund an increase in capacity necessary to meet the condensed timescales proposed by the Applicant. A longer time period would therefore lessen the pressure on the Council's capacity to respond to and decide applications.</p>	