



The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.15: Draft Statement of Common Ground Between National Grid Electricity Transmission and the East Suffolk Council

Planning Inspectorate Reference: EN020026

Version: A
January 2026

nationalgrid

Contents

1.	Introduction	1
1.1	Overview	1
1.2	This Statement of Common Ground	1
1.3	The Role of East Suffolk Council in the DCO Process	2
1.4	Description of the Proposed Project	2
1.5	Format of Document and Terminology used.	2
2.	Record of Engagement	7
2.1	Summary of discussions	7
3.	Areas of Discussion Between the Parties	8
3.1	Summary of Principal Matters from Relevant Representation	8
	Lack of coordination	8
	Landfall	13
	HVDC Cable Route	16
	Saxmundham Converter Station Co-location	17
	Saxmundham Converter Station Access and River Fromus Crossing	24
	HVAC Cable Route	36
	Friston Substation	37
	Construction Compounds	46
	Construction Noise and Vibration – Working Hours	47
	Impacts on Health and Wellbeing	49
	Community Benefits and Compensation	52
	Socio-economics, Leisure and Tourism	53
	Ecology	64
3.2	Other Areas of Discussion	70
	Draft DCO	70
	Agriculture and Soils	89
	Landscape and Visual	90
	Cultural Heritage	97
	Air Quality	99
	Noise and Vibration	102
	Cumulative Effects	106
	Policy, need, site selection and design	108
	Consultation	110
	Other Matters	111
4.	Approvals	114
5.	References	115

Table of Tables

Table 3.1 Lack of coordination	8
Table 3.2 Landfall	13
Table 3.3 HVDC Cable Route	16
Table 3.4 Saxmundham Converter Station Co-location	17
Table 3.5 Saxmundham Converter Station Access and River Fromus Crossing	24
Table 3.6 HVAC Cable Route	36
Table 3.7 Friston Substation	37
Table 3.8 Construction Compounds	46
Table 3.9 Construction Noise and Vibration – Working Hours	47
Table 3.10 Impacts on Health and Wellbeing	49
Table 3.11 Community Benefits and Compensation	52
Table 3.12 Socio-economics, Leisure and Tourism	53
Table 3.13 Ecology	64
Table 3.14 Draft DCO	70
Table 3.15 Agriculture and Soils	89
Table 3.16 Landscape and Visual	90
Table 3.17 Cultural Heritage	97
Table 3.18 Air Quality	99
Table 3.19 Noise and Vibration	102
Table 3.20 Cumulative Effects	106
Table 3.21 Policy, need, site selection, coordination and design	108
Table 3.22 Consultation	110
Table 3.23 Other Matters	111

1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A SoCG is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matter’s that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination, and then updated as necessary or as requested during the Examination Phase.

1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared between the Applicant and East Suffolk Council (ESC). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024). It should be noted that a combined SoCG with both ESC and Suffolk County Council (SCC) was submitted with the DCO application (**Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329]**). As agreed with both Councils, the combined SoCG has been split into one for each Council so that the positions being raised by each can be responded to more directly and in order to keep each SoCG more focussed on the issues relevant to them. Section 3 Areas of Discussion Between the Parties has been restructured so that Section 3.1 contains the summary of principal matters from ESC’s relevant representation.
- 1.2.2 ESC are currently reviewing the draft DCO section within Section 3.2 and will provide an updated position on each of these matters in the next iteration of the SoCG. This SoCG will be progressed during the pre-examination and examination periods to reach a final position between the Applicant and ESC and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.
- 1.2.3 For the purpose of this SoCG, the Applicant and ESC are jointly referred to as the “Parties”. When referencing ESC alone, they are referred to as “the Consultee”.

1.3 The Role of East Suffolk Council in the DCO Process

- 1.3.1 ESC is a local authority for the purposes of Section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the Proposed Project is within their local authority areas. Pursuant to Section 42 of the Planning Act 2008, National Grid must consult local authorities (referred to as host authorities) if the Proposed Project is in a local authority's area.
- 1.3.2 ESC's role in the Development Consent Order (DCO) process derives from the Planning Act 2008. The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of ESC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:
- Providing the local perspective at the pre-application stage, in addition to any views expressed directly to the applicant by residents, groups and businesses.
 - Preparing written representations, SoCGs and Local Impact Reports ready for examination.
 - Attending and participating in hearings and/or accompanied site visits.
 - Discharging many of the requirements associated with a DCO if consent is granted.
 - Monitoring and enforcing many of the DCO provisions and requirements.

1.4 Description of the Proposed Project

- 1.4.1 The Proposed Project is described in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.

1.5 Format of Document and Terminology used.

- 1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.5.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed', 'not agreed but not material', or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved. 'Not agreed but not material' indicates that although the parties have not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed. The Parties have also indicated the likelihood that agreement will be reached on each item.
- 1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
ACMP	Anglican Coastal Monitoring Programme

Abbreviation/Term	Definition
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
ASTI	Accelerated Strategic Transmission Investment
BPM	Best Practical Means
BNG	Biodiversity Net Gain
CEA	Cumulative Effects Assessment
CEMP	Construction Environment Management Plan
CIPD	Chartered Institute of Personnel and Development
CNVMP	Construction Noise and Vibration Management Plan
CoCP	Code of Construction Practice
CRTN	Calculation of Road Traffic Noise
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
CTMTP	Construction Traffic Management and Travel Plan
DCO	Development Consent Order
DESNZ	Department of Energy Security and Net Zero
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
DRP	Design Review Panel
EA	Environment Agency
EACN	East Anglican Connection Network
EIA	Environmental Impact Assessment

Abbreviation/Term	Definition
EPUK	Environment Protection UK
ES	Environmental Statement
ESC	East Suffolk Council
ESO	Electricity System Operator
FEED	Front End Engineering Design
FRA	Flood Risk Assessment
GVA	Gross Value Added
HAEP	Host Authority Engagement Plan
HE	Historic England
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAQM	Institute of Air Quality Management
IDB	Internal Drainage Board
IEMA	Institute of Environmental Management and Assessment
KCC	Kent County Council
LCA	Landscape Character Area
(Outline) LEMP	(Outline) Landscape and Ecology Management Plan
(Outline) LEMS	(Outline) Landscape ecology management Strategy)
LHA	Local Highway Authority
LOAEL	Low Observable Adverse Effect Level
LOD	Limits of Deviation

Abbreviation/Term	Definition
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MMO	Marine Management Outline
NE	Natural England
NESO	National Electricity System Operator
NETS	National Electricity Transmission System
NGET	National Grid Electricity Transmission
NGV	National Grid Ventures
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSRI	National Soil Resources Institute
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptors
NVMP	Noise and Vibration Management Plan
OCSS	Offshore Coordination Support Scheme
OWSI	(Outline Onshore) Overarching Written Scheme of Investigation
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Rights of Way
REAC	Register of Environmental Actions and Commitments
RPA	Root Protection Area
RSPB	Royal Society for the Protection of Birds

Abbreviation/Term	Definition
SCA	Seascape Character Area
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SCZ	Secondary Consultation Zone
SoCG	Statement of Common Ground
SoS	Secretary of State
SPR	Scottish Power Renewable
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TCPA	Town and Country Planning Application
TTM	Temporary Traffic Management
WHO	World Health Organisation
WFD	Water Framework Directive

2. Record of Engagement

2.1 Summary of discussions

- 2.1.1 Appendix A summarises the consultation and engagement that has taken place between the Parties.

3. Areas of Discussion Between the Parties

3.1 Summary of Principal Matters from Relevant Representation

Lack of coordination

Table 3.1 Lack of coordination

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	The Applicant Current Position	Status
3.1.1	Application Document 7.10 Coordination Document [APP-363]	Engagement to reduce cumulative impacts and to reduce spatial extent of adverse effects on communities and the environment	East Suffolk Council (ESC) is disappointed at the lack of meaningful engagement by the Applicant with other energy scheme promoters locally, reducing opportunities to reduce cumulative and in-combination impacts. It is ESC’s view that the project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination. Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in our region over the next decade have been missed or simply ignored. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects on the basis of cost, with little regard being paid to the consequential long-lasting damage that so much onshore infrastructure proposed within the East Suffolk district is causing and will continue to cause. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken place nor has any thought been given to working together to mitigate the delivery of future energy infrastructure in this region. Instead, our local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another each with its own significant impacts on a number of communities in the area and in-combination, is simply unacceptable. This is unsustainable.	<p>The Applicant does not agree with the assertion that there has been a lack of meaningful coordination in the development of the Proposed Project, and that opportunities for coordination have been missed or ignored. Evidence of the Applicant’s approach to coordination is demonstrated comprehensively in Application Document 7.10 Coordination Document [APP-363].</p> <p>Coordination with other projects and other promoters has been ongoing for several years and has materially influenced the development of the Proposed Project. The outcome of this coordination is a project that has thoroughly explored and, where feasible, delivered a range of opportunities for the reduction of impacts on the environment and host communities. These opportunities are embedded in the routing and siting decisions, the approach to design and mitigation, and in the ways that the Proposed Project might work with other developers during the delivery stages to reduce impacts on communities and the environment.</p> <p>In accordance with National Policy Statement (NPS) EN-1 paragraph 3.3.80 and NPS EN-5 paragraphs 2.13.11, 2.14.2 and 2.15.1 (DESNZ, 2023), the Applicant has considered approaches to coordinate wherever possible with other projects at the strategic and/or project levels to reduce impacts on local communities and the environment.</p> <p>Some key themes from the representation are addressed below.</p>	Under discussion
3.1.2	Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]	Engagement and coordination with other NSIP projects in the area	The lack of coordination evident between Sea Link and other proposed Nationally Significant Infrastructure Projects (NSIPs) connecting in the same locality is a significant concern. ESC is strongly of the view that maximum coordination and collaboration should be inherent within the design and ambitious solutions being proposed as the revised NPSs state. Coordination is more than just co-location and it is essential that there is a real and visible reduction in the disruption and environmental	<p><u>Landfall locations and onshore cable routes</u></p> <p>The representation asserts that the identification of the proposed landfall location at Aldeburgh and associated onshore cable route has been the result of opportunities for collaboration and coordination being missed or ignored. This is not the case. The decisions by the respective subsea</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			impacts that these infrastructure projects are causing, and indeed pro-active mitigation measures should be developed that will reduce the impact on the relevant communities.	cable projects (Sea Link and National Grid Venture's (NGV) LionLink)) to propose landfalls at different locations is instead a result of extensive detailed technical review, options appraisal, and engagement over a number of years, exploring the relative merits of co-located and geographically separate strategies.	
3.1.3	Application Document 7.10 Coordination Document [APP-363]	Coordination with NGV's LionLink project	<p>In order to deliver a genuinely coordinated approach, National Grid Electricity Transmission (NGET) should have sought to align the Sea Link project's timeframe for examination with that of the LionLink project, both spatially and temporally in terms of consenting and delivery. The alignment of timescales would allow a shared or conjoined examination with the appointment of the same examining panel to consider the two projects. This would not only help to reduce the huge burden on local communities and statutory consultees imposed by the consenting process, but it would also allow the robust consideration of the coordinated design and cumulative impacts of the projects.</p> <p>The cumulative impact of undertaking works and co-locating multiple projects must be carefully considered and assessed in terms of noise and vibration, air quality and dust, light and other environmental protection matters. Coordination should seek to reduce overall impacts and prevent magnifying such impacts by their cumulative effects.</p> <p>NGET's decision to exclude cable ducts and infrastructure associated with NGV's project enables NGV to carry out their own assessments and decision-making in total independence from NGET and SeaLink. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between Sea Link and the NGV project will lead to the same conclusions by technical specialists on the best cable routeing. As such, it is likely that the conclusions of NGV's assessments of the best cable route will be similar to those reached by NGET. ESC is of the view that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the SeaLink project, this would meaningfully reduce the significant environmental impacts of both projects. Additionally, promoters laying cable ducts only for their own project in isolation means each successive developer will have to work around the cables and ducts already laid and the exclusion swathes associated with them. The end result is a much wider cable swathe with successive impacts of construction on the environment and local communities. This is an unfair and unacceptable impact and goes beyond the protective wording upon which NGET insist on relying when faced with unacceptable impacts.</p>	<p>The suite of engineering, cost, and environmental factors which influenced the Proposed Project's Aldeburgh landfall and onward cable route are presented in Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. When, in March 2024, NGV's LionLink identified its emerging preference for landfalls other than at Aldeburgh, the Applicant reviewed whether these other landfall options would be preferable for the Proposed Project in order to continue exploring co-location with LionLink. This review is summarised in Application Document 7.10 Coordination Document [APP-363]. Given that the Proposed Project approaches the coast from the south and LionLink from the north, the two projects encounter different technical and environmental constraints that influence where along the coast it will be appropriate to make landfall. The conclusion was that the proposed Aldeburgh landfall remained the right option for Sea Link. Co-location (between the Proposed Project and the LionLink emerging preference) has therefore been consciously discounted as part of a coordinated review.</p> <p>The Applicant does not accept the statement in the representation that these decisions have been made with little regard to consequential long-lasting damage. The process of options appraisal that has informed the design of the Proposed Project inherently considers the impacts on the environment and communities, while the likely significant environmental effects of the Proposed Project, including cumulative effects, are considered and presented in the Volume 6 Environmental Statement.</p> <p><u>Oversight and vision</u></p> <p>The representation states that different landfall locations and onward cable routes demonstrates a serious lack of oversight and vision from Government and commercial promoters, and that no holistic planning has taken place. As set out in Application Document 7.2 Strategic Options Report Back Check [APP-320] however, the Proposed Project was identified by the Electricity System Operator (ESO) (now the National energy System Operation, or NESO) in the Holistic Network Design (HND) report (July 2022), which sets out a single integrated transmission network design that supports the large-scale delivery of electricity generated from offshore wind. The process by</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.1.4	Application Document 7.2 Strategic Options Report Back Check [APP-320]	Interaction with offshore wind energy generation	<p>In reference to Sea Link's potential interaction with offshore wind energy generation, ESC would draw attention to the fact that the North Falls offshore wind farm project has retained an 'Option 3: Offshore electrical connection, supplied by a third-party'. Realistically, this can only relate to the Sea Link project which passes close to the wind farm. We appreciate that the primary connection being pursued by that project (which is currently in examination: EN0101194) is to utilise an onshore connection linking into the East Anglian Connection Node (EACN) proposed as part of the NGET Norwich to Tilbury overhead 400kV pylon project. This would be located in the District of Tendring, Essex. Should an offshore connection become the option selected for North Falls, however, due to any unforeseen issues or delays with the yet to be consented Norwich to Tilbury EACN, then such a scenario may require additional onshore infrastructure in East Suffolk. This would not be supported by ESC. Had an offshore option been deemed viable, it would have been essential that stakeholders and the decision maker had been made aware of the direct and indirect impacts. If allowing this offshore connection necessitates greater quantities of onshore infrastructure, this impact must be fully acknowledged and assessed within the Sea Link DCO application to ensure a fair, robust and transparent process. An offshore wind farm connection with Sea Link could also reduce the transmission capacity of the Sea Link project, potentially resulting in a requirement for a second connection between Suffolk and Kent to facilitate the original purpose of the Sea Link grid network reinforcement – if a need can be demonstrated. This would not be supported by ESC.</p>	<p>which generators apply to the Electricity System Operator (ESO) for connections into the National Electricity Transmission System (NETS) is also set out in the Application Document 7.2 Strategic Options Report Back Check [APP-320] (this also applies to interconnectors). Notwithstanding the Proposed Project's role as part of a holistic and integrated transmission network, and the formal process (overseen by the ESO) by which generators and interconnectors secure connection agreements, the approach that the Applicant has taken to developing the Proposed Project is set out in Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369], and, in terms of how the Proposed Project is coordinated with others in the area, Application Document 7.10 Coordination Document [APP-363].</p> <p>While recognising that this part of the representation is addressing more parties than just the Applicant (specifically the Government and promoters more widely), it is nonetheless the case that none of the processes which lead to the various project emerging in East Suffolk or how these projects are developed lack oversight or vision.</p> <p><u>Converter station and AC cables</u></p> <p>The representation asserts that there is a lack of coordination evident between the Proposed Project and other proposed NSIPs connecting in the same locality. The Applicant strongly rejects this characterisation of the Proposed Project's converter station and AC cable design. The converter station and AC cable elements of the project design are in fact the outcome of significant coordination with other projects in the area. This is evidenced by the masterplanned approach and the suite of other design measures that afford the flexibility and/or optionality necessary to continue exploring ways to reduce environmental and community effects with a project (LionLink) that is much earlier in its design and development than the Proposed Project. This is presented in Application Document 7.10 Coordination Document [APP-363]. As set out in this document, there are various ways in which the Proposed Project and LionLink projects may be able to coordinate during delivery, depending (in part) on the outcome of the LionLink project development process and the temporal overlap between the construction phases.</p> <p>The representation makes further assertions regarding financial interests and regulatory constraints restricting the good will and capabilities of other project promoters, and that this has the potential to restrict the quality and quantity of coordinated mitigation efforts in and around co-located</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				<p>aspects of the projects. It is not clear to the Applicant specifically what these comments relate to. However, the Applicant can confirm that while NGV is a legally separate business, National Grid Electricity Transmission (NGET) treats NGV like it would any other third-party and does coordinate as it does with any other developer.</p> <p><u>Shared or conjoined Examination with LionLink</u></p> <p>The representation suggests that the Applicant should have aligned its project timescale with that of LionLink, with a view to a shared or conjoined examination with the appointment of the same examining panel to consider the projects. While the principle of this approach was discussed with local authorities in mid-2023 (recognising that this approach was used for the parallel East Anglia One (North) and East Anglia Two Development Consent Order (DCO) examinations in 2020), this strategy was identified at that time as not feasible, and discounted.</p> <p>Whereas East Anglia One (North) and East Anglia Two are both phases of the East Anglia Hub group of windfarms off coastal Suffolk, developed by Scottish Power Renewables (SPR), Sea Link and LionLink are completely separate projects, progressed by different developers and each with its own discrete needs case. The Proposed Project is a transmission network reinforcement whereas LionLink (promoted by NGV, a legally separate entity) is a proposed commercial interconnector to the Netherlands. There would be significant challenges associated with considering in parallel two planning cases progressed by separate developers. Each project is likely to draw on NPS policies differently, have been designed and developed in different ways, require independent and different 'planning balance' cases, and have different justifications for land acquisition. This would increase administrative burdens on PINS and the ExA, potentially increase the risks of judicial challenge, and possibly make the separate proposals more difficult to understand for interested and affected local people and landowners.</p> <p>Further and fundamentally, the importance of delivering Sea Link means that the Applicant cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its Accelerated Strategic Transmission Investment (ASTI) licence to deliver Sea Link, and to the Government objectives to deliver clean power by 2030. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind Sea Link.</p>	

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	The Applicant Current Position	Status
				<p><u>Interaction with North Falls windfarm</u></p> <p>The representation addresses delivery scenarios set out in the separate DCO application for the North Falls offshore windfarm, with the specific concern being that further onshore infrastructure may be needed in East Suffolk.</p> <p>The relevance to the Proposed Project is that one of these scenarios appears to reflect the possibility of an offshore interaction between Proposed Project and North Falls (as well as another windfarm, Five Estuaries), which was explored through the Offshore Coordination Support Scheme (OCSS) process between 2022 and 2024. This comprised a review of the feasibility of connecting the North Falls and Five Estuaries offshore windfarms with the Proposed Project in the offshore environment, rather than into an onshore connection point. However, for reasons set out in Application Document 7.10 Coordination Document [APP-363], this did not progress past the feasibility stage.</p>	

Landfall

Table 3.2 Landfall

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.2.1	Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]	Landfall at Suffolk	The landfall selected is located at the seaside town of Aldeburgh, just across the road from the well-known sand and shingle beach. The site is within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast, Leiston-Aldeburgh Site of Special Scientific Interest (SSSI), and Royal Society for the Protection of Birds (RSPB) North Warren Reserve, and close to the Sandlings Special Protection Area. The town is a hugely popular tourist and visitor destination with the area heavily used year-round as a walking route between Aldeburgh and Thorpeness. It follows that the disruption created in the area by the proposed Sea Link project would adversely impact both the local community and the tourist economy. In addition to the high landscape importance of the area, Aldeburgh is also considered of great cultural significance – a significance which should not be under-estimated.	The location of the landfall within the Suffolk and Essex Coast and Heaths National Landscape and defined Heritage Coast is acknowledged. The potential effects of the Suffolk Onshore Scheme are reported for the National Landscape (referred to as the Area of Outstanding Natural Beauty (AONB) within documentation) and the Heritage Coast within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]). This identifies that there would be Minor adverse effects during the construction period with residual negligible effects in operation. The visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) also includes an assessment on viewpoint 13 which represents recreational receptors walking between Aldeburgh and Thorpeness and notes the Minor adverse effects to this receptor during construction with ‘no change’ at the operation and maintenance phase of the Suffolk Onshore Scheme due to no operational infrastructure being visible.	Under discussion
3.2.2	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047] Application Document 6.6 Habitats Regulations Assessment Report [REP2-009]	Impact from potential frack outs	The marine High Voltage Direct Current (HVDC) cables would cross under Leiston-Aldeburgh SSSI, North Warren RSPB Reserve and Thorpe Road. The Applicant suggests that direct impacts on the designated sites will be largely avoided. Whilst this is reassuring the statement needs to be tested and it is hoped that the ExA should satisfy themselves that ESC’s concerns are fully addressed. Horizontal Directional Drilling (HDD) is one of the trenchless techniques which could be adopted but the potential risk of ‘frack out’ associated with this technique and the impacts this could have must be fully considered. ESC has experience of other NSIPs utilising HDD techniques and, on each occasion, ‘frack outs’ have occurred. The potential hydrological impact from the trenchless construction works on the designated sites and measures that could be implemented to address potential impacts which could arise must be fully explored. Whilst ESC accepts that HDD would be less impactful on the designated site than cut and fill, it is considered that the issue of frack out needs to be assessed and appropriate mitigation proposed.	An approximately 6 ha area is proposed within the Order Limits as acid grassland enhancement, which is being done to offset the temporary loss of acid grassland at the landfall as a result of the proposed HDD compound. This enhancement would be commenced prior to the temporary loss of existing acid grassland and secured for ten years to offset the lag time in restoration of the existing acid grassland that can be expected once the cable trench works are complete and the HDD compound and haul road are removed. As no acid grassland is being lost permanently, this area of enhancement would result in a medium-term increase in the area of priority habitat, resulting in a positive impact. It is noted regarding the importance of liaising with RSPB and Natural England on HDD matters. Conversations are ongoing with Natural England around their Relevant Representations. Potential impacts of HDD on designated wildlife sites in Suffolk, including frack-out, are discussed in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047] and Application Document 6.6 Habitats Regulations Assessment Report [REP2-009] . In addition, HDD contractors will need to submit their proposed fluid components to the Environment Agency (EA)/Marine Management Organisation (MMO) for approval prior to use.	Under discussion
3.2.3	Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]	Access to the landfall	Access to the landfall area by large vehicles is also very limited. The site is served by narrow roads which either travel through Aldeburgh or Thorpeness, two popular seaside destinations. The western end of the landfall and cabling corridor are in close proximity to residential properties. The potential for noise and vibration disturbance resulting from		Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			landfall activities must be fully considered in relation to nearby residential properties.		
3.2.4	N/A	Engagement with Natural England and RSPB	In reference to the proposed HDD at landfall being used to mitigate impacts on the SSSI, the Applicant will be expected to collaborate with Natural England and RSPB to ensure that this mitigation is feasible and adequately secured.	<p>Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] of the Environmental Statement (ES) assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on tourist and visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.</p> <p>Additionally, the Applicant notes that ESC has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. A review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005].</p> <p>Ahead of construction and separately to the DCO process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, which may include measures to benefit the local visitor economy.</p> <p>With regards to construction noise and vibration at residential properties at the western end of the landfall and cabling corridor, this is considered in Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109] and Application Document 6.4.2.9 (B) ES Figures Suffolk Noise</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				<p>and Vibration [AS-125]. The assessment has highlighted the intersection of the underground cable construction works at Leiston Road as a potential construction noise 'hot-spot', where there is the potential for significant adverse effects at nearby residential receptors, without mitigation. There are also potential significant adverse effects from noise due to potential night-time working which may be required as part of the HDD works to the east of Leiston Road. However, with mitigation in the form of best practicable means (BPM) significant adverse effects are not expected. Specific mitigation measures would be detailed by the Main Works Contractor(s) following their detailed assessments. The results of their assessment and associated mitigation measures will be outlined in the Construction Noise and Vibration Management Plan (CNVMP) which will be in accordance with Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk [AS-132] as per Schedule 3 Requirement 6 of the DCO as set out in Additional Submission 3.1 (C) draft Development Consent Order (Clean) [CR1-027], to which East Suffolk Council is a discharging authority.</p>	

Table 3.3 HVDC Cable Route

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.3.1	<p>Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]</p> <p>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p>	HVDC Cable	<p>There are numerous negative aspects in landscape terms associated with the proposed HVDC cable route. It is inevitable that an open cut trench laying method for cable installation and the associated haul road will lead to adverse impacts on the fabric of the landscape i.e. losses of sections of field boundary hedgerow and tree removals, although it is recognised that to varying degrees, these are largely of a temporary nature. This vegetation removal would, however, be occurring in addition to the clearance works that have already taken place in the district as part of other NSIP projects, including Sizewell C.</p>	<p>The proposed HVDC cable route has been assessed as part of the Suffolk Onshore Scheme for all identified landscape and visual receptors, as detailed within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) and the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The removal of vegetation to facilitate cable laying has been considered within the Landscape and Visual Impact Assessment (LVIA) for both landscape and visual receptors, including within the Suffolk Coast and Heaths AONB where it is acknowledged within the assessment that some types of habitats such as acid grassland would take longer to recover. This has also been considered cumulatively with other projects, for example at construction it is acknowledged that there are potentially significant effects on the Suffolk Coast and Heaths AONB due to the associated construction activity being a temporary feature in the landscape when considering the total cumulative effects of Sizewell C, EA1N and EA2 and LionLink (Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]). These total cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time.</p>	Under discussion

Table 3.4 Saxmundham Converter Station Co-location

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.4.1	<p>Application Document 7.10 Coordination Document [APP-363]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p>	Cumulative Impacts	<p>ESC understands that the Saxmundham site was identified due to its apparent ability to accommodate more than one converter station at a single co-located site, and that NGET has now confirmed the preferred location of the SeaLink converter station within the wider context of that landscape. They have refined the order limits to remove the areas that may be required for the future NGV projects and ESC have been working with NGET and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated way. NGET's intention to work with NGV to develop a coordinated approach to the development and delivery of the SeaLink and LionLink projects is acknowledged. However, these intentions and aspirations must be realised through tangible outcomes that reduce the individual and cumulative impact of energy projects on environmental, residential, and socio-economic receptors within East Suffolk.</p> <p>If SeaLink alongside other NSIPs such as the proposed LionLink project be progressed within our district, this should only be on the basis of a coordinated approach. ESC is seriously concerned about the cumulative local impacts of multiple projects, with the district currently facing one of the largest construction projects in Europe (Sizewell C), in addition to SPR's EA1N, EA2 and EA3 projects. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station site is genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and still achieve long-term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils.</p>	<p>The Applicant agrees that it has been working with ESC and NGV to develop a masterplan which considers the most appropriate way of developing the wider site in a coordinated way. The Applicant similarly agrees that the outcomes of this ongoing process of coordination should be tangible outcomes.</p> <p>The approach to coordination is presented in Application Document 7.10 Coordination Document [APP-363]. This document sets out how coordination has been considered in various ways and at all stages of the project and is summarised earlier in this document.</p> <p>At the Saxmundham site, the Applicant seeks the powers needed to deliver the Proposed Project. However, the design of the Proposed Project, including the location of the converter station, the access from the highway, cable routing, mitigation, and the approach to construction compounds have been informed by a site-wide masterplan that has been developed in dialogue with (amongst others) NGV, ESC and Suffolk County Council (SCC). Subject to LionLink applying for and being granted development consent for its project in the way foreseen, this provides a range of opportunities for ongoing coordination. This includes coordination on the final design and appearance of the infrastructure and the approach to mitigation, and on ways to reduce the impacts of the construction phases themselves.</p> <p>The approach to coordination on the Proposed Project does therefore deliver tangible benefits, both in terms of the potential co-location of infrastructure, and also in the potential to continue to work with other developers to explore how the delivery stages of each project can be coordinated in ways that deliver benefits to communities and the environment.</p> <p>With respect to consideration of cumulative effects with other projects including Sizewell C, EA1N, EA2 and LionLink, these have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate (The Planning Inspectorate, 2015) and are reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].</p> <p>The Applicant has provided details on its approach to good design through the Design Approach Documents Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029] and Application Document 7.12.1 Design Principles – Suffolk [APP-366]. Along with the coordination document Application Document 7.10 Coordination Document [APP-363] these design approach documents discuss the need for ongoing liaison with</p>	Under discussion

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				<p>stakeholder through the detailed design process. Extract from Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029]:</p> <p><i>“There have also been thematic meetings with LPAs that cover the converter station design principles and the colocation masterplan for Saxmundham. It is suggested that these are continued through the development of detailed designs ahead of the submission of statements and drawings for demonstration of compliance with the design principles.”</i></p>	
3.4.2	<p>Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]</p> <p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</p>	Visual Impact	Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape.	<p>The importance of ‘Good design’ and the visual impact of the Proposed Project is acknowledged when considering the Suffolk Onshore Scheme and in a coordinated scenario. The visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]) sets out the details of the visual assessment, which identifies the visual effects on visual receptors throughout the construction and operation and maintenance (year one winter and year 15 summer) phases of the Proposed Project. The visual impact of the Proposed Project is noted and the visual assessment acknowledges that parts of the Proposed Project, including the upper extent of the Saxmundham Converter Station, would be experienced by some receptors. The open nature of parts of the landscape is acknowledged however the local landscape character also includes varied sized blocks of woodland which contributes to a layered vegetation network that restricts long-distance views in places.</p> <p>The landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) also sets out the embedded mitigation to aim to reduce and where possible avoid landscape and visual effects, including design principles for the proposed built form. This would include locating the Saxmundham Converter Station as far as practicable within the southern extent of the site, away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual impact. The embedded mitigation also refers to landscape design principles including the proposed establishment of native woodland planting within areas previously planted as willow plantation around the River Fromus, to consider opportunities for advanced planting to provide early establishment of woodland planting which would assist in mitigating construction effects and integration of the Suffolk Onshore Scheme into the existing landscape pattern as far as practicable by utilising and following existing features, including vegetation.</p> <p>The Design Approach Document (Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]) and Design Principles (Application Document 7.12.1 Design Principles – Suffolk [APP-366]) set out further details regarding the design of the proposed infrastructure.</p>	Under discussion

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3.4.3	Application Document 2.14.1 Indicative General Arrangement Plans -Suffolk [APP-038]	Surface Water Drainage	<p>It is also important that surface water drainage and flood risk at the site is appropriately assessed and managed given the contours and potential poor infiltration properties at the site due to the Ancient Estate Claylands landscape type. ESC has stressed to NGET throughout the preapplication stage that the Order Limits must be sized appropriately to accommodate the drainage solution for the site during both construction and operation, and the ExA should satisfy themselves that this is indeed the case.</p> <p>ESC has previously raised concern about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. This area also provides an opportunity to commit to early planting close to receptors.</p>	<p>The Applicant's outline drainage strategy is discussed in Appendix C: Outline Surface Water Drainage Strategy of Application Document 6.8 Flood Risk Assessment [APP-292]. The strategy sets out key surface water drainage principles. The various locations for infiltration and attenuation are shown on the general arrangement plans Application Document 2.14.1 Indicative General Arrangement Plans -Suffolk [CR1-024], green for infiltration and blue for attenuation and discharge. The latter is the case for the Saxmundham Converter Station site where infiltration tests have shown that infiltration is not feasible.</p> <p>Assessments have been undertaken to calculate runoff volumes, and attenuation features have been sized to accommodate these volumes for the Saxmundham Converter Station and the associated temporary and permanent associated development. Outfall connections from the attenuation features have been provided linking to the nearest suitable watercourses. Ponds have been indicatively sized based on the outline design of the works and have been designed to meet the national and local policy guidance for Sustainable Drainage Systems (SuDS) design. Sufficient space has been included within the order limits to accommodate changes at detailed design should these be required. The indicative drainage design proposed is shown to be fully accommodated within the Order Limits in the 2.14.1 Indicative General Arrangements Plans – Suffolk [CR1-024].</p> <p>Additional ground investigation works including infiltration assessments will be carried out to validate the results from the existing data and the Applicant will continue to work with other developers in coordinating the drainage designs for the various projects. The Applicant has committed to including an Operational Drainage Management Plan for discharge under Requirement 6 to provide further control and reassurance on operational drainage.</p> <p>At the request of the Examining Authority, the Applicant has added a work number on drainage to the Works Plans (Application Document 2.5.1 Works Plans [CR1-007]) and the draft DCO (Application Document 3.1(E) Draft Development Consent Order [CR1-027]); Work Number 13 Principal Drainage Works. The area covered by Work Number 13 is shown in the revised Works Plans (revision B) submitted at Deadline 1. These plans show that there is a significant area to the north and south of the proposed converter station for provision of drainage, in addition to areas to the east and west. This provides more than sufficient flexibility to design and construct the required drainage within the Order limits. It should also be noted that drainage works are also covered by the associated development works outlined within Schedule 1 of the draft DCO (Application Document 3.1 Draft Development Consent Order[CR1-027]) so can also occur outside the area shown as Work 13. This is because it is not possible at this stage of design to identify the area for all works required for, for example, alterations to land drains. The flexibility</p>	Under discussion

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				<p>is therefore essential for delivery of the project and addressing ESC's concerns that there is insufficient space for drainage.</p> <p>With regard to the Order Limits along the B1119 and allowing enough space for mitigation planting, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. However, the Applicant is aware that additional space within the Order Limits for maintenance of the hedgerow and drainage ditch would be beneficial, and has recently submitted a Notification of their Intention to Submit Request for Proposed Changes to the Development Consent Order Application to broaden the strip of land south of the B1119 in Suffolk to accommodate the proposed new hedgerow, existing drainage and space to maintain both features Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]. This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) and the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). The Order Limits along the B1119 do not include a Public Right of Way (PRoW) connection as it is not identified as essential mitigation in the ES and therefore powers are not sought for this. It is noted that powers sought for compulsory acquisition must be necessary and proportional and whilst it is acceptable in this context to seek rights for maintenance of the ditch and new planting; obtaining the rights for a permanent Public Right of Way is more challenging in the context that it has not been identified as being essential in the Environmental Statement. Land south of the B1119 is proposed for a temporary PRoW diversion during the construction period to retain connectivity.</p>	
3.4.4	<p>Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056]</p> <p>Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138]</p>	Operational Noise	<p>In relation to operational noise emanating from the proposed converter station site, at the Statutory Consultation stage, ESC requested a below background sound rating level as the acoustic character of the area is quiet and rural, and the Sea Link project will introduce a potential persistent industrial noise into this area. Projects of this scale have the responsibility and means to ensure they achieve the best possible outcome, and this begins with a thorough assessment considering all aspects of introduced noise and not simply relying on calculated levels where there is an inherent uncertainty. Noise creep is a concern for ESC particularly in the co-location scenario. We would ask the ExA to satisfy themselves that a robust assessment which</p>	<p>The assessment of operational noise from the proposed Saxmundham Converter Station is presented in Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109] and Application Document 6.3.2.9.D (B) ES Appendix 2.9.D Suffolk Operational Noise Assessment [AS-119]. The assessment considers the character of the area in determining the overall potential impact and effect as part of the consideration of context.</p> <p>The aim of the local authority is for the noise rating level to be below the representative background sound level, when assessed in accordance with BS 4142:2019+A1:2019 'Methods for rating and assessing industrial and commercial sound' (BS 4142). The Applicant agrees in principle with trying to achieve this aim,</p>	

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			<p>considers the character of the area and character of that noise has indeed been undertaken.</p> <p>ESC also expressed concerns at Statutory Consultation stage that the Preliminary Environmental Information Report (PEIR) had not properly considered the operational impacts from noise on birds and other fauna, rather it focussed on impacts related to maintenance visits and not the operational noise of the converter station. ESC also raised concerns about National Grid's intention to scope out noise effects from new overhead lines. It is considered that further assessment is required to justify the assumption of unlikely significant adverse effects.</p>	<p>although, it is conceded that this may not be achievable at the nearest noise sensitive receptors (NSRs) (noting that the night-time background sound level is used). However, this aim is above and beyond (i.e. more stringent than) the requirements of national planning policy and guidance, including:</p> <ul style="list-style-type: none"> • Overarching National Policy Statement for Energy (EN-1); • National Policy Statement for Electricity Networks Infrastructure (EN-5); • National Planning Policy Framework (NPPF); • Noise Policy Statement for England (NPSE); and • Planning Practice Guidance for Noise (PPGN). <p>Further detailed assessments will be undertaken by the converter station developer and specific noise mitigation measures will be incorporated in the detailed design.</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 includes a commitment (NV07) that:</p> <ul style="list-style-type: none"> • the Saxmundham Converter Station will include noise mitigation measures in the design; • proposed substations and converter stations will be designed such that noise from their normal operation does not cause a significant adverse effect at nearby noise sensitive receptors; and • Additionally, where feasible the substation and converter station designs will seek to achieve noise levels at nearby noise sensitive receptors in line with the aims of the local authorities, or otherwise as low as reasonably possible. <p>An assessment of noise on bird and other fauna is provided in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047].</p> <p>An assessment of noise from changes to the existing overhead line near the proposed Friston substation is presented in Application Document 6.3.2.9.E Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [AS-121].</p>	Under discussion
3.4.5	Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]	Impacts on Landscape and visual amenity	<p>There are numerous negative aspects in terms of landscape and visual amenity associated with the proposed converter station site and the River Fromus crossing site. It is established by the required assessments, and it is stated in the ES, that, for the Saxmundham converter station site and the Fromus crossing site, there will be significant adverse effects on their respective landscape's character, during construction, operation, and decommissioning. Visual</p>	<p>The concerns around the landscape effects arising from the Proposed Project are noted, specifically the Saxmundham Converter Station and River Fromus crossing. The landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) sets out the detailed landscape assessment and the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D</p>	

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			<p>amenity will also be similarly affected with a notable portion of the horizontal view occupied by construction activity for 9 of the 23 selected representative viewpoints because of their proximity to construction and decommissioning activity.</p> <p>It is acknowledged in the ES that these significant adverse effects will continue through to Year 15 for both landscape character and visual amenity for the same viewpoints. These lingering adverse effects will persist partly because of the nature of the receiving landscape, and also because of the difficulties of establishing new tree planting in the east of Suffolk.</p> <p>The Converter Station site has been cleared of almost all former woodland and hedgerows and field boundaries since the 1960s, and the proposed early planting and new screening will see the return of woodland areas, other trees and hedgerows to the locality. Long term river valley woodland planting will not only help screen the Fromus crossing bridge and approach route but will also provide a lasting long-term benefit to the character of the river valley landscape which may be regarded as a preferable alternative to the current relatively short-term rotation cropping of cricket bat willow plantations. New planting around the Converter Station will be a necessary addition to local green infrastructure and wildlife connectivity.</p>	<p>Visual Amenity Baseline and Assessment High Resolution [APP-098] sets out the detailed visual assessment for identified receptors. These assessments conclude a number of residual significant adverse landscape and visual effects arising from the Proposed Project at year 15 (summer) of operation and maintenance. This includes Landscape Character Area (LCA) L1, within which the Saxmundham Converter Station, would be directly located and nine representative viewpoints which are either located in the highly localised landscape around Saxmundham Converter Station or in the local landscape to the west of the River Fromus bridge crossing.</p> <p>Whilst the introduction of the Saxmundham Converter Station within LCA L1 and within the views of localised visual receptors would result in residual adverse effects, it is important to note the factors that lessen the overall degree of change. These include the large-scale arable field that the infrastructure is situated in and proximity to the large-scale woodland block which provides a degree of screening and acts as a backcloth within many views. The proposed landscape planting would also assist in reinstating the former woodland and hedgerows that were present on the site. However, it is the scale and nature of the Saxmundham Converter Station within a localised area of the landscape which would experience a large alteration from certain key characteristics of the LCA and visual change. This would include the deeply rural character and the limited intrusion from modern development, albeit noting the local context of the existing towers and Overhead Line (OHL). It would also include the busy B1119, large-scale agricultural buildings and land uses not typical of the arable farmland typically present across the local landscape character, including a Christmas Tree plantation.</p> <p>In relation to the residual significant adverse visual effects relating to those receptors to the west of the River Fromus bridge crossing, the effects largely relate to the combination of the introduction of the proposed Saxmundham Converter Station and River Fromus bridge crossing as uncharacteristic features within the view, rather than of the bridge alone. The proposed planting around both parts of the Proposed Project would assist in softening views.</p> <p>The difficulties of establishing new tree planting in the east of Suffolk is noted due to weather patterns, however, the purpose of such proposed planting in the outline landscape mitigation plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]) is not proposed to fully screen the proposals, rather to soften views, create additional vegetated layers within the landscape and provide landscape integration, which it is considered that the proposed planting would achieve by operation and maintenance year 15.</p> <p>The positive aspects of the outline landscape mitigation proposals on the Saxmundham Converter Station site are noted with respect to the reinstatement of historic vegetation and establishment of green infrastructure and wildlife connectivity. The positive aspects</p>	
3.4.6	Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]	Mitigation Planting	<p>If the project is consented, ESC will expect NGET to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. This should be incorporated in a Requirement within the DCO. In this context, ESC would highlight that early planting is not uncommon for other projects in this area and, as an example, preconstruction planting was agreed under the SPR consents around the Friston substation. In addition, ESC will not accept a scenario whereby the mitigation planting delivered under one project's consent (i.e. SPR's proposed Friston substation mitigation planting) is subsequently harmed and its function diminished by another project following it (i.e. Sea Link's HVAC cable route crossing SPR's proposed substation mitigation planting).</p>		

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				<p>of the outline landscape mitigation proposals in the local landscape within the River Fromus valley relating to the replacement of the willow plantation with native woodland planting are also noted.</p> <p>This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) and the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]) which is secured through Schedule 3 Requirement 6 of Application Document 3.1 draft Development Consent Order [CR1-027].</p> <p>With regard to the pre-construction planting agreed under the SPR DCO consent around the Friston Substation, the Applicant and the SPR EA1N and EA2 team are currently working together to produce a coordinated landscape mitigation plan. This plan seeks to avoid a situation where landscape planting is implemented and subsequently removed by a future project and which seeks to enable the mitigation planting proposed by SPR to maintain its required function whilst also allowing for the various elements of the Sea Link Suffolk Onshore Scheme in this locality. The coordinated landscape mitigation plan is based on SPR's detailed landscape design and so this coordinated plan will not be issued in the public domain until EA1N and 2 have finalised their plans and make their landscape plans publicly available.</p> <p>The Applicant has deliberately included wide Limits of Deviation for the Sea Link High Voltage Alternating Current LEMP(HVAC) and HVDC cables so that the best routes can be selected to minimise environmental impacts and maximise the benefits of proposed mitigation planting. The EA1N and EA2 Outline Landscape and Ecological Management Strategy (document reference 8.7 in the East Anglia Two application) shows very limited planting to the west, north and east of Friston substation. This means that whilst it will not be possible to plant over the cables for Sea Link, it is the Applicant's view that it is possible to deliver planting that meets or even exceeds the requirements of the EA1N and EA2 Outline Landscape and Ecological Management Strategy with Sea Link in place.</p> <p>With regard to planting at the Saxmundham Converter Station site, it is also worth noting that the Sea Link outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] within Section 7.6 'Co-ordination with National Grid Ventures Projects', sets out that the detailed Landscape Ecology Management Plan (LEMP) would include details around a coordinated landscape design on the Saxmundham Converter Station site to enable the function of the outline landscape mitigation to be maintained.</p>	

Table 3.5 Saxmundham Converter Station Access and River Fromus Crossing

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.5.1	Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]	Assessment of alternative access options for the Saxmundham Converter Station site.	<p>Access to the proposed Saxmundham co-located converter station site is constrained due to the road network serving the area and the desire not to route traffic through either Saxmundham or Leiston. The proposed Fromus crossing on the confirmed western access route remains a concern for ESC as it will require significant intrusive engineering and design work which presents a substantial challenge to National Grid to deliver, along with the associated expense. At the last round of pre-application consultation, being ESC's last formal engagement on the selected access route prior to submission, we stressed that robust justification is required for ruling out the alternative accesses, noting the delivery of the Fromus crossing will require significant engineering works, the full detail of which had not been clearly set out. The confirmed western access has the potential to create significant environmental, landscape, and heritage issues.</p> <p>Additionally, the proposed western access route may not be viable for the LionLink project, as LionLink's converter station will be on a plot requiring more cut and fill and so may require more heavy plant associated with these activities. The ExA should satisfy themselves that the proposed western access route is viable for a co-located and coordinated site in this regard.</p> <p>Without the detailed justification supporting the western access route or an understanding as to whether an alternative access arrangement is possible which would not involve the need to cross the Fromus, ESC cannot accept nor agree with NGET's conclusions that the western access is the best option.</p>	<p>The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. Based on engagement with stakeholders, the Applicant then further considered a total of five alternative accesses as shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206], concluding that the western access remained the preferred option. for the reasons set out in paragraphs 3.8.3 to 3.8.18 in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</p> <p>Briefly summarised, the proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. Introducing greater amounts of traffic on the local road network for longer stretches would result in greater likely environmental effects associated with noise, air pollution and effects on the character of the network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits.</p> <p>The Fromus bridge crossing is a significant part of the project but will require standard engineering processes to construct, this will include the construction of piled foundations and bridge abutments which are to be set back 8 m from the river, the in situ construction of the bridge deck, parapets and surfacing and the construction of approach ramps on either side. The Applicant is working with all stakeholders to balance the conflicting requirements and agree an optimum solution for the bridge through detailed design.</p>	Under discussion

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3.5.2	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	The impacts of the River Fromus crossing.	<p>ESC has raised concern about the impact of the Fromus crossing in the landscape, introducing a crossing of significant scale in a sensitive landscape setting in proximity to the Grade II Listed Hurts Hall and Grade II* Listed Church of St John the Baptist.</p> <p>ESC welcomes the project’s engagement with the Suffolk Design Review Panel, and its feedback is an important element for NGET to consider and incorporate into the final bridge design. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including genuine engagement with key stakeholders.</p>	<p>All assets where the Suffolk Onshore Scheme has the potential to result in heritage impacts were identified in Section 6 ‘Assessment of Heritage Significance’ of the Cultural Heritage Baseline Report (Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]). This assessment noted where there was the potential for significant effects, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 ‘Conclusions’ of the Heritage Baseline Report (Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]).</p> <p>The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Proposed Project, including the Fromus River crossing, on the Grade II Listed Hurts Hall and Saxmundham Conservation Area (which includes the Grade II* Listed Church of St John the Baptist).</p> <p>The assessment concludes that in views towards Hurts Hall from the B1121, the Proposed Project (including the Fromus crossing) would result a medium impact on an asset of medium value (recognising that Hurts Hall is a Grade II Listed building), resulting in a likely ‘<i>moderate adverse</i>’ (significant) effect, reducing to ‘<i>minor adverse</i>’ (not significant) once additional mitigation planting has established at year 15.</p> <p>Regarding the Grade II* Listed Church of St John the Baptist, this is considered as part of Saxmundham Conservation Area. The assessment concludes that while the impact on the Conservation Area would be small, given that it is considered to be of high value (due in part to the presence of the Church of St John the Baptist), there is a likely ‘<i>moderate adverse</i>’ (significant) effect, reducing to ‘<i>minor adverse</i>’ (not significant) once additional mitigation planting has established at year 15.</p> <p>At Deadline 1 the Applicant has submitted Application Document 9.44 St John’s Church Grade II* Listed Building Technical Note [REP1-118]. This Technical Note concludes that the effect of the Proposed Project on this asset would be minor adverse (at Year 1 of Operation), which is not significant. With the additional mitigation measures in place, including screening planting, the residual effect would reduce to neutral (by Year 15 of operation),</p>	Under discussion

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				<p>which is not significant. This residual effect would result in no harm to the heritage asset.</p> <p>In both cases the assessment considers and reports effects based on both the Converter Station and the Fromus crossing together contributing to changes in views, rather than of the Fromus crossing on its own. The additional mitigation is presented in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [CR1-043].</p> <p>Regarding the crossing itself, the Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from ESC regarding the emerging design concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included (as acknowledged in the representation) engagement with the Suffolk Design Review Panel. The emerging design approach was presented in Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029]. This document illustrates various ways that the bridge could be developed, drawing from a detailed review of local built environment, case studies of other bridges in sensitive locations locally and further afield, and a robust analysis of the environmental and heritage setting.</p> <p>The Applicant intends to submit an updated version of Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029] at Deadline 1A that will be updated in relation to the Fromus crossing to reflect ongoing discussions between the Applicant and East Suffolk and Suffolk Councils.</p> <p>In addition to the ongoing engagement with ESC, the Applicant is also engaged in detailed discussions with the Environment Agency (EA) regarding the most appropriate bridge soffit height above the Q95 (low water level) of the River Fromus, in the context of the Water Framework Directive (WFD). While the Applicant is comfortable that the proposed crossing of the Fromus is compliant with the objectives of the WFD at a height of 4 m (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may restrict the Applicant’s ability to develop a bridge structure that is less substantial than the ‘worst case’ assessed in the landscape & visual and heritage assessments in the ES.</p> <p>The Applicant will ensure that the final bridge design is as visually recessive as possible, whilst conforming to the Critical Design Constraints set out in Application Document 7.12.1. Design Principles – Suffolk [APP-366]. Furthermore, the Applicant will submit details of the final design including a technical statement, drawings, and 3D</p>	

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				renders of the design the ESC, to demonstrate how the design addresses various key areas in ways that reduce impacts. This is set out in commitment LV14 in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3, which is secured by Requirement 6 of Application Document 3.1 (E) Draft Development Consent Order [CR1-027] .	
3.5.3	Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295]	Assessment of trees and hedgerows near the River Fromus crossing	<p>Although existing trees and hedgerows have been assessed according to the guidance contained in the 2012 edition of BS 5837 Trees in Relation to Design, Demolition and Construction, a new edition is due to be published in the near future, and when it is, Category A and veteran trees may need to be re-assessed according to the anticipated new guidance covering what are expected to be uncapped root protection areas (compared to the existing current capped RPAs) for such trees. The Council notes that the Veteran Horse Chestnut (T871S) which stands close to the Fromus crossing point has been assessed to have a RPA radius of 40 m which acknowledges the recommendation for uncapped RPA radii for Veteran trees.</p> <p>The timing of the new British Standard is currently unknown, but ESC will expect all tree survey information to be re-submitted according to the new guidance once the new Standard is published and for Arboricultural Method Statements to be amended accordingly.</p>	<p>The publication date for the updated version of BS5837 Trees in relation to design, demolition and construction was due to be Spring 2025. However, the British Standards Institution website has been updated to state a publication date of 27 March 2026.</p> <p>The root protection area (RPA) for the horse chestnut (T871S) has been calculated in accordance with the Standing Advice and BS5837:2012. This has resulted in the measurement of the main stem diameter only which is 1560 mm. It was not considered appropriate to measure the stem diameters of the layered stems/branches due to their distance from the main tree stem. The Standing Advice for ancient and veteran trees states that the RPA should be the stem diameter multiplied by 15, or 5 m from the edge of the tree canopy (whichever is greatest). For T871S multiplying the stem diameter by 15 would result in an RPA of 23.4 m, however, 5 m from the edge of the canopy would result in an RPA of 40m and in accordance with the Standing Advice the larger RPA has been utilised within Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295].</p> <p>Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295] includes the latest tree survey information which utilises the most up to date guidance (BS5837:2012). The document includes survey information for the area adjacent to the Fromus Crossing and identifies the likely tree related impacts from the Proposed Project. Tree related impacts from the Fromus Crossing include the partial removal of G859S and G860S which are two willow plantation groups. No veteran or ancient trees will be removed to facilitate the Fromus Crossing which includes the retention of T871S, an ancient horse chestnut and T875S a veteran oak.</p>	Under discussion
3.5.4	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	Landscape and Visual impacts	The removal of vegetation to facilitate the construction of a larger bridge, including both plantation vegetation and mature woodland, has the potential to further open up views toward the converter station site and increase the focus towards this activity. During the pre-application stage, the scale of the bridge over the River Fromus was increased in response to concerns from the EA regarding impacts on aquatic invertebrates and compliance with the WFD. The	To clarify, the LVIA assumes that some of the willow plantation to the west of the River Fromus would be felled prior to construction of the Suffolk Onshore Scheme with the remaining areas felled by Operation Year 1. This has been considered as part of the future baseline, has informed the landscape and visual assessment as well as the development of mitigation planting options around the River Fromus and River Fromus bridge. This is set out within the	Under discussion

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			increased construction activity and associated vegetation removal as a result has the potential to have a higher magnitude of effect on the Fromus Valley Landscape Character Area. The construction activity would occupy a larger area in closer proximity to the setting of Hurts Hall and within the parkland landscape, which is of a special quality and a feature of the Landscape Character Area.	<p>'future baseline' section of the landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]).</p> <p>The removal of mature vegetation on the eastern edge of the River Fromus would occur to facilitate the construction of the River Fromus bridge crossing, which is acknowledged in the assessment on LCA B4 within the landscape assessment appendix (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]) and within the assessment on Viewpoints 2 and 20 within the visual assessment appendix (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Due to the angle of the view and the landform sloping down towards the River Fromus crossing, it is not considered that this vegetation removal would open up views towards the Saxmundham Converter Station site. The limited vegetation removal required for the permanent access route to enter the Saxmundham Converter Station site would result in a small gap in the network along the skyline from views to the west of the River Fromus which is considered within the overall visual assessment. Mitigation planting is focussed along this section of the ridgeline to strengthen the existing woodland.</p> <p>The different bridge height scenarios, ranging from approximately 4 m to 6 m from the Q95 water level to the bridge soffit (which is also approximately 4 m to 6 m from ground level at the abutment to the top of the parapet), are considered in the LVIA. A worst-case approach has been taken meaning that the vegetation removal associated with the approximately 6 m bridge has been assumed based on Appendix E Tree Protection Plans Suffolk Onshore Scheme of the Application Document 6.10 Arboricultural Impact Assessment [APP-295].</p> <p>The LVIA concluded that whilst the magnitude of effect would be comparatively lower for the smaller of the two bridge height options that it would not be sufficient to change the overall magnitude of effect which remained the same for both bridge height options when considered within the landscape and visual assessment appendices (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). It is also considered that regardless of the height of the proposed River Fromus bridge, from a landscape character perspective, at construction there would be effects on the setting of the Hurts Hall parkland landscape near to Hurts</p>	

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				Hall due to construction activity in the adjacent LCA relating to the remainder of the permanent access route and Saxmundham Converter Station, however, there would be a limited effect on the southern setting of the settlement of Saxmundham. The permanent infrastructure would not impact upon the historic relationship between Hurts Hall and St John's Church, Saxmundham on the approach to Saxmundham.	
3.5.5	Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]	Impacts on woodland vegetation.	<p>The removal of the mature woodland vegetation along a section of the River Fromus will alter the vegetation network. A bridge of this footprint and height would remain an incongruent feature within the local landscape, even once the mitigation planting is established. Landscape planting around the bridge would assist in lessening this effect in the long-term. However, ESC is aware of significant concerns in the community about the potential loss of veteran trees and ancient woodland, particularly around the Saxmundham converter station site and Fromus crossing.</p> <p>ESC is currently reviewing its position in this respect and will update over the course of the Examination.</p>	<p>The detailed landscape and visual assessment appendices detail the consideration of the permanent loss of mature vegetation on the eastern edge of the River Fromus which would occur to facilitate the construction of the River Fromus bridge crossing (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] and Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). The visual assessment appendix notes the residual significant adverse effect arising from the combination of the Saxmundham Converter Station and River Fromus bridge crossing at year 15 for Viewpoints 2 and 20. The landscape assessment appendix explains how the landscape planting proposals matured at year 15 would result in a non-significant adverse effect on LCA B4 due to increased integration into the local landscape and partial restoration of the gap along the vegetation along the River Fromus. The planting around the Saxmundham Converter Station would also create some separation between the LCA and the permanent infrastructure of the Saxmundham Converter Station.</p> <p>There would be no loss of veteran trees or ancient trees, as noted within the Arboricultural Impact Assessment (Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]) and no ancient woodland would be lost as a result of the Proposed Project.</p>	Under discussion
3.5.6	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Impacts of the River Fromus Crossing on the surrounding heritage assets.	<p>In terms of design and heritage considerations, moving the Fromus bridge approximately 40m north along the river will bring it closer to Hurts Hall and to the south of Saxmundham. This will make the crossing more prominent in important views toward Hurts Hall (Grade II) and the Church of St John the Baptist (Grade II*), and the Saxmundham Conservation Area. The potential impact on the Conservation Area and on the Church of St John the Baptist is a result of the introduction of the bridge and the permanent access, however the potential impact of the mitigation planting around the bridge and access is also an important consideration. Introducing large areas of planting where there are currently open views toward a heritage asset also</p>	<p>The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]. This includes a worst-case assessment of the impact of the Fromus Crossing on the Grade II Listed Hurts Hall and the Grade II* Listed Church of St John the Baptist in Saxmundham Conservation Area.</p> <p>A representative view towards the Grade II listed Hurts Hall from the B1121 to the southwest of the asset was subject to summer and winter photography and photomontages were created to demonstrate the appearance of the view at</p>	Under discussion

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			<p>has the potential to affect their significance if it obstructs those views.</p> <p>ESC notes National Grid's assessment of overall impact on Hurts Hall and the Saxmundham Conservation Area, as being one of a moderate adverse effect. ESC strongly disagrees with the applicant's assessment that the landscape mitigation will result in a residual minor adverse effect on Hurts Hall, on the basis that the landscaping would soften the bridge and access road, however the combined effect of the Converter Station and the new permanent access and bridge would remain significant.</p> <p>ESC also wishes to highlight that the final height of the bridge affects not only the visual impact of the bridge itself, but also of the abutment walls and the ramps.</p>	<p>different stages of the site development and to demonstrate different options under consideration for the bridge design. These are provided Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208] and Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]. These detail the summer and winter baseline situation, the situation following removal of vegetation and introduction of the Fromus Crossing bridge (two options), and the situation at Year 15 of operation when screening planting has matured. These photomontages demonstrate that the proposed screening planting for the bridge, access and Saxmundham Converter Station does not obscure this view of the asset.</p> <p>No screening planting is proposed in the vicinity of the Church of St John the Baptist and there is no screening planting proposed at distance from the asset that is considered to have the capacity to obscure key views of or from it.</p> <p>The reduction in the residual significance of effect reported in Section 3.11 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] in relation to Hurts Hall as a result of the maturation of screening vegetation at Year 15 of Operation is mainly related to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the asset's setting. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in the residual minor adverse significance of effect assessed at Hurts Hall.</p> <p>Engagement with ESC regarding the emerging illustrative design options for the bridge is ongoing and will continue as designs develop, with a view to minimising harm to heritage assets.</p>	
3.5.7	Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Access Routes by Construction Traffic	The western access also presents a number of concerns more generally regarding the access route to be taken by construction traffic. Specifically, regarding the use of Abnormal Indivisible Loads (AILs), the transportation of heavy plant for the purposes of grading the site and 'cut and fill' activities, and also the delivery of large cable drums. Vehicles using the A12 would need to cross various culverts which have a maximum weight limit which requires detailed assessment.	<p>Assessment of highways assets</p> <p>The condition of the existing highway network is continually evolving and it is normal practice for an Abnormal Indivisible Load (AIL) contractor to need to navigate restrictions and constraints along a network between the point of departure and arrival. The restrictions affecting the network in Suffolk do not present abnormal or unusual challenges to an AIL contractor, who have standard practices overcome restrictions. These measures also provide impediments to the use of the western access. Consent is required for AIL movements, with this consent being predicated on a survey of the route (as present prior to delivery) and proposals to overcome any constraints. These consents are always sought after a DCO because they need to take into account the precise source of a delivery (which cannot be</p>	Under discussion
3.5.8	N/A	The construction of an overbridge to transport Abnormal Indivisible Loads (AIL)	The crossing of the rail line using the SCC owned asset Benhall Bridge presents a weight limit constraint, with this being understood to have a maximum bearing strength of circa 46 tons, significantly less than a 400kV transformer. Whilst ESC defers these matters to SCC as Highways	<p>the precise source of a delivery (which cannot be</p>	Under discussion

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			<p>Authority, we support SCC's concerns and ESC is very conscious of the concerns raised and the impact upon the local community for which it has a dual responsibility with SCC. At the time of writing, the use of overbridging methods by NGET, or statutory powers, has not been discussed in detail to a point where all parties are in a position to agree. The A12 junction, culverts and rail bridge at Benhall have also not been included in the Suffolk onshore order limits. The views of Network Rail should also be sought in relation to the Benhall bridge weight limit and the potential use of over bridging methods.</p> <p>Without the detailed justification supporting the western access route or an understanding as to whether an alternative access arrangement is possible which would not involve the need to cross the Fromus, ESC cannot accept or agree with NGET's conclusions that the western access is the best option.</p>	<p>determined with certainty prior to decisions on the purchase of materials), timing of deliveries and the current condition of the highway network. It is not necessary or proportional to provide these details at the application stage.</p> <p>Suffolk County Council (SCC), in its capacity as highways authority, has suggested that structures along the A12 may have weight restrictions, although no further details on these structures/ weight limits have been provided to the Applicant to date.</p> <p>The Applicant similarly acknowledges that amongst the assets that will require a solution at the delivery stage is the Benhall Railway Bridge on the B1121, which forms part of the construction traffic route from the A12 to the converter station site. Given the very particular interest of ESC and SCC in Benhall Bridge; as an exception, the Applicant agreed to look in detail at this asset during the Pre-Examination and Examination phases to provide confidence that a solution is deliverable. This is not because this detail is considered necessary or because the Applicant agrees there is any issue; but to provide evidence that the Applicant is correct in the assessment that these are business as usual issues that can be navigated prior to deliveries.</p> <p>The Benhall Railway Bridge is recognised as a weight-restricted asset that may require overbridging or temporary strengthening to facilitate the crossing of AILs. It should be noted that this relates to a small number of AIL vehicles only, as SCC have confirmed that the majority of the construction vehicles, everything up to and including STGO 1 (46 tonnes), are permitted to use the bridge.</p> <p>Regarding the AILs, and in accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase. These specialist engineers routinely work with developers and highways departments during construction projects to develop the detailed methodologies needed to successfully deliver AILs to sites.</p> <p>As discussed with SCC, there are various standard measures available to facilitate this. The specific methodology will depend on details available at later stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required).</p> <p>Whichever bridge strengthening methodology is used, if indeed one is necessary, suitable Temporary Traffic</p>	

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				<p>Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12.</p> <p>Since the submission of the DCO application, a further review of the suitability of the Benhall Railway Bridge for transporting AILs has been carried out, including discussions with SCC and ESC to review various methodologies. ESC and SCC explicitly requested that the Applicant include Benhall Bridge in the Order limits for the project. The Applicant explained that this was unnecessary because the powers within the draft DCO already provided the powers for traffic management along the A12 and the ability to carry out works such as installing a temporary overbridge within the highway. The Applicant proposed amendments to the draft DCO to make this position more explicit and discussed these amendments with the Councils at a meeting on 6 August 2025; and associated emails before and after the meeting. ESC and SCC continued to suggest that the area be added to the Order limits and that adjacent land be considered to provide reassurance and flexibility in how solutions are delivered.</p> <p>Whilst the Applicant maintains that it was not necessary for the bridge to be added to the Order limits and that a solution could be delivered without adjacent land, the Applicant agreed to compromise and add this into the Order limits because another change was required to the Order limits as a result of further archaeological surveys carried out along the cable corridor. As a result, the Applicant then submitted to the ExA a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]) to include additional land within the Order Limits at the Benhall Rail Bridge. The additional land considered would provide more flexibility over the methodology for crossing this asset with AILs, and to provide greater clarity over the consenting route without wording changes to the draft DCO.</p> <p>Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] sets out proposals for the management of construction-related traffic along the local highway network within the vicinity of the Suffolk Onshore Scheme during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. A final Construction Management and Travel Plan will be submitted and approved by Suffolk County Council under Requirement 6 of the draft DCO; providing final details on proposed vehicle routing and traffic management.</p> <p>The Applicant is, as a matter of course engaging with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions,</p>	

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				<p>including Network Rail. To date Network Rail has not raised any concerns over the Benhall Bridge crossing or overbridge.</p> <p>Proposed access route</p> <p>The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option.</p> <p>The Applicant then further considered these three potential access routes plus an additional two, all five of which are shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206]. The conclusion was that the western access remained the preferred option, for the reasons set out in paragraphs 3.8.3 to 3.8.18 in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</p> <p>Briefly summarised, the proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits.</p>	
3.5.9	Application Document 7.11.1 Design Approach Document [REP1A-029]	Design of the River Fromus Crossing	<p>ESC is encouraged by the Design Approach Document.</p> <p>At pre-application stage it was advised that the bridge should not attempt a pastiche of a historic bridge type, as that would imply a connection between Hurts Hall and the bridge. Instead, a well-designed contemporary bridge should be proposed, which aims to reduce its visual prominence through its design. It is positive to see the progression of the design approaches, and the options shown in the document are considered to anticipate the post-consent requirements. Of the options for the railings, the one with slender uprights perpendicular to the bridge structure is preferred, as it represents a higher quality design that is both distinctive and more likely to blend in with the proposed planting, subject to colour.</p>	<p>The Applicant welcomes these comments and is continuing to engage with ESC on this matter, with thematic meetings held to discuss the design of the bridge on 25 June 2025 and 9 October 2025. Further thematic meetings to be held, as required.</p>	Under discussion

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3.5.10	N/A	Location of the River Fromus Crossing	ESC did not request that the proposed River Fromus Crossing should be moved further north to avoid the veteran tree. On the contrary, ESC asked that the impact on the veteran tree should be comprehensively reviewed and the tree properly protected. This could have been equally achieved by other means (including moving the crossing further south instead of north). ESC is concerned that moving the River Fromus crossing northwards to its current position impacts upon other disciplines (i.e. heritage impacts on Hurts Hall).	The exact location of the crossing has been carefully considered, with the option presented in targeted consultation in July 2024 considered alongside the option further north and an option further south. This took into account heritage, landscape, ecology, arboricultural, flood risk, WFD and planning policy considerations. The repositioning of the crossing of the River Fromus to the location further north was presented in the local engagement undertaken in November 2024 and considered in the Additional preliminary heritage information – design amendments in Suffolk.	Under discussion
3.5.11	Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [AS-011] Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]	Public Rights of Way	ESC notes that the site is crossed by Footpaths 5 and 6 which would require temporary and permanent diversions to accommodate the proposed development. It is essential that any temporary or permanently diverted routes provide appropriate amenity for its users, being an integral component of the masterplan for the site, with any permanent diversion being established with the long-term future of the site fully considered (i.e. future converter station developments coming forwards) to avoid the need for subsequent diversions.	The Order Limits will be sufficient to accommodate the PRow diversions required around the proposed Converter Station site as shown on the Application Document 2.7 (B) Access, Rights of Way and Public Rights of Navigation Plans [CR1-011] . This includes a permanent PRow diversion for PRow E-491/005/0 (Footpath 5) around the Converter Station itself and a temporary PRow diversion for PRow E-491/006/0 (Footpath 6) to avoid a construction compound. These PRow diversions will act in conjunction with one another to maintain PRow connectivity with each other, as well as other existing (non-diverted) PRow in the area. Further details are also provided within Table 5.1 of Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] , which identifies the PRow diversions which will be in place. It should also be noted that the proposed PRow diversions have been and will continue to be co-ordinated with other projects, such as LionLink, as necessary, to minimise the requirements for additional/ subsequent PRow diversions around future converter station developments which could potentially come forward at a later stage.	Under discussion
3.5.12	Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230] Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]	Impacts on heritage assets	ESC has concerns regarding the harm that the converter station and the access over the River Fromus will cause to the significance of designated heritage assets which surround the site, due to the impact of the development on their setting. In particular, Grade II listed Hurts Hall and Hill Farmhouse, as well as the Saxmundham Conservation Area and Grade II* Church of St John the Baptist would be impacted through the changes in their settings. For reasons that will be set out in ESC's forthcoming Local Impact Report (LIR), ESC disagrees that there would be no impact on Hill Farmhouse, and instead considers that there would be a moderate adverse effect on Hill Farmhouse.	The assessment of Hill Farmhouse presented in Paragraph 3.9.117 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] include robust consideration of the degree to which the surrounding agricultural landscape contributes to the significance of the asset and the degree to which it is sensitive to visual intrusion resulting from the Proposed Project. It highlights the enclosed nature of the asset's setting, being largely screened from view due to the boundary planting in its immediate curtilage. Views of the asset in the surrounding landscape are not a feature of its setting that contributes to significance. Viewpoint CH3 in Application Document 6.4.2.3 ES Figures Suffolk	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>Cultural Heritage Part 2 of 2 [APP-230] is taken from the south of the asset looking north towards the proposed Saxmundham Converter Station. This demonstrates both the asset's lack of visibility and the lack of visibility of the Proposed Project which would sit behind it in the view.</p> <p>With reference to Landscape Viewpoint 5 in Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209], it is the Applicant's assessment that this viewpoint further demonstrates the lack of contribution that is currently made by visual setting to this asset, however, since Hill Farmhouse is located off the far left of the view an image with slightly adjusted extents has been provided as Appendix A of the Applicant's response to the LIR. This shows the building largely screened by trees and demonstrates that the view does not provide understanding of its heritage value as a 17th century L-plan farmhouse with later alterations. Therefore, although the proposed Saxmundham Converter Station will feature prominently in this view, it is not a key view, or otherwise important view towards the asset where its heritage interests are conveyed and / or understood. The Applicant therefore reiterates the assessment that the Proposed Project will not result in any impact to the heritage value of this asset through change to its setting and no effect and no harm is identified.</p>	

Table 3.6 HVAC Cable Route

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	The Applicant Current Position	Status
3.6.1	Application Document 7.10 Coordination Document [APP-363]	HVAC Cable Route	NGET’s decision to exclude cable ducts and infrastructure associated with NGV’s project therefore allows NGV to carry out their own assessments and decision-making in independence from NGET and SeaLink. It is reasonable to assume that with likely shared converter station and substation sites at Saxmundham and Friston, assessment of similar cable swathes between SeaLink and the NGV project will lead to the same conclusions by technical specialists on the best cable routing. As such, it is likely that the conclusions of NGV’s assessments of the best cable route will be similar to those reached by NGET. ESC is of the view that an opportunity for coordination has been missed by both NGET and NGV; if NGET laid cable ducts for another project at the same time as laying the ducts for the SeaLink project, this would meaningfully reduce the significant environmental impacts of both projects.	<p>The reasons why the Proposed Project is not seeking powers for works that may form part of emerging NGV proposals are set out in Application Document 7.10 Coordination Document [APP-363]. This document confirms that this approach was considered with regards to the NGV Nautilus and Lion Link interconnector project, and sets out the reasons why it was not progressed. As detailed in the document, these include:</p> <ul style="list-style-type: none">• a lack of certainty over the design of the NGV projects and therefore the powers that Sea Link would be seeking;• differing needs cases meaning that any additional powers (such as Compulsory Acquisition) in the Sea Link application may not be justifiable by NGET;• the potential consenting and programme risks associated with directly embedding non-Sea Link works may affect ASTI programme; and• the fact that works which exclusively form part of the NGV projects do not fall within the scope of the Sea Link s35 direction for the project and are not associated development, meaning that development consent for these elements could not be sought. <p>However, it is not considered that NGET having statutory powers to deliver works for NGV projects is the only means by which coordination in project delivery can be achieved.</p> <p>Indeed, while powers to deliver LionLink are not sought as part of the Proposed Project application, NGET has worked with NGV to create opportunities to coordinate during project delivery in ways that deliver benefits and efficiencies, whilst also reducing impacts to the environment and local communities affected.</p> <p>While the co-delivery of the HVAC ducting is potentially possible (under separate compatible consents), this is considered unlikely for various programme, procurement, regulatory, and business interface reasons. However, other forms of coordination in project delivery such as sharing of temporary works or re-use of on-site aggregate may be more feasible, and these continue to be considered. This is further detailed in Application Document 7.10 Coordination Document [APP-363]</p> <p>The feasibility of this type of coordination is however dependent on various programme, procurement, regulatory and commercial factors.</p>	Under discussion

Friston Substation

Table 3.7 Friston Substation

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.7.1	Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]	Friston Substation – impact on landscape planting	<p>An uncoordinated and piecemeal approach to the cable ducts associated with Sea Link and LionLink will result in multiple separate cable routes entering the Friston substation site, subsequently adversely affecting and removing the mitigation planting around the Friston substation agreed under the East Anglia One North and East Anglia Two project consents. This was required to mitigate the impacts of the substation on Friston, and a key element of that mitigation is landscape planting. It is unacceptable for multiple successive projects to come forward and diminish and damage that mitigation planting by actively avoiding coordinating cable routes between projects. There is a serious risk that the HVAC cable corridor entering the proposed Friston substation site will undermine the effectiveness of the consented landscape mitigation. ESC has a strong preference for NGET to use HDD to minimise adverse impacts on this landscape mitigation and this has been raised in multiple meetings by ESC officers prior to the submission of the DCO application. ESC understands, however, that NGET are reluctant to HDD under the consented landscape mitigation for the SPR projects due to cost, being regulated by Ofgem whose primary function is to protect the consumer. The alternative, however, is open cut and fill trenching through the landscape mitigation. This goes against the fundamental principle of the landscape mitigation scheme which was agreed with and is a required measure for the SPR consents to help mitigate landscape visual impacts in the vicinity of Friston village.</p> <p>Although NGV are not regulated in the same manner as NGET, NGET's justification of cost being the primary reason not to HDD under SPR's approved landscape mitigation would subsequently set a precedent, likely decreasing the probability of NGV using HDD methods. Any future desire for a coordinated HVAC to use HDD methods to avoid disruption to the landscape mitigation should not be restricted at this stage by NGET. ESC reiterates that it is unacceptable for multiple successive projects to come forward and diminish that mitigation planting by deliberately avoiding coordinating cable routes between projects. ESC therefore continues to request that NGET review their position on this and include the ability within their DCO to provide the ducting for the LionLink project which would significantly reduce</p>	<p>The approach to cable routing on the approach to Friston/Kiln Lane substation is not uncoordinated or piecemeal, nor has coordination been actively avoided. The approach to coordination in this instance must accommodate the fact that there are a number of projects that will interact with Friston/Kiln Lane substation, which are all at distinctly different project stages. The consented SPR windfarm projects (EA1N and EA2) are currently developing detailed landscape and substation designs ahead of mobilizing for delivery, the Proposed Project is entering its DCO examination (with the level of landscape and design detail being outline and parameter-based, as is normal at this stage), whereas the NGV LionLink project is understood to be preparing for a statutory consultation in early 2026.</p> <p>Coordination in this circumstance takes the form of ongoing collaboration between the various developers, so that the evolving designs and powers respectively being implemented (EA1N & EA2), sought (the Proposed Project), and consulted on (LionLink) can be developed in compatible ways which retain the functionality of the original SPR mitigation planting, while allowing other projects to progress.</p> <p>This approach, including how flexibility has been embedded into the Proposed Project design to facilitate ongoing discussions with other developers around detailed landscape design and cable routing, is set out in more detail in Application Document 7.10 Coordination Document [APP-363].</p> <p>With regard to the pre-construction planting agreed under the SPR DCO consent around the Friston substation, the Applicant has been working closely with SPR to understand and resolve interfaces between Sea Link and SPR EA1N and EA2 landscape proposals and has had co-ordination meetings with SPR during the pre-application and pre-examination stages on this. The Applicant has explained the reason for the differences between the landscaping plans within SPR applications and those submitted with the Proposed Project application in their submission to the ExA in July 2025 Application Document 9.6 Applicant's Response to the s89 Procedural Decision [AS-061] and September 2025 Application Document 9.24 Friston Substation Update Letter [AS-148].</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			unnecessary disruption to the local community, environment and consented and secured mitigation planting.	<p>Requirement 14 in the DCO for EA2 states that no stage of onshore works may commence until a landscape management plan '<i>(which accords with the outline landscape and ecological management strategy)</i>' (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]) has been submitted and approved by the relevant planning authority. The interfaces between the Sea Link project and the EA1N/ EA2 project as shown in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] are described below.</p> <p>The Sea Link HVAC cables enter the site of the Friston substation from the northwest and enter the new substation from the west. The current alignment shown in the Works Plans (Application Document 2.5.1 (B) Works Plans [CR1-0007]) would interact with three key features as shown on the EA2 Outline LEMS; a proposed cable sealing end compound to the north west of the substation, planting proposed to screen the new sealing end compound and a proposed new sustainable drainage system pond to the west of the proposed Friston substation. SPR has confirmed that the cable sealing end compound and drainage pond are no longer required and emerging plans that have been shared with ESC, amongst others, do not show these features. The small amount of planting to the north and west of the proposed sealing end compound in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] was proposed to screen the compound so would not be required in the same form without the compound in place. Given the limited area required for the cable easement, it would be possible to plant significantly more planting to the northwest and west of Friston substation than is shown in the Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] even with Sea Link cables in place. This would achieve better outcomes than can be achieved through the planting shown in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] and better outcomes than are strictly required by the EA1N and EA2 DCOs.</p> <p>The Sea Link HVDC cables similarly enter from the north west and travel south east to the east of the proposed Friston substation. The key interactions between these cables and features in the EA2 Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] are between the cables and two further proposed sealing end compounds and planting around these compounds. As with the compound to the northwest of the substation, The Applicant understands that these elements of the project are no longer being taken forward. These cables</p>	

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				<p>would also interact with planting to the east of the Friston substation, although again, the aims of the Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] can be achieved with Sea Link cables in place.</p> <p>SPR has been developing more detailed landscaping proposals to discharge requirements and working closely with The Applicant to do so.</p> <p>In November 2025 SPR kindly provided the detailed of the draft detailed landscape masterplan to The Applicant. The Applicant agreed to review this masterplan and identify the best cable routes to minimise the environmental impacts of the development, taking into account SPR's more detailed landscaping masterplan. This plan seeks to avoid a situation where landscape planting is implemented and subsequently removed by a future project, by narrowing down the areas where planting would need to be low level due to the future presence of Sea Link cables. This plan can be shared at a future Deadline when complete and agreed with SPR.</p> <p>On the Saxmundham site, the outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]), within Section 7.6 'Co-ordination with National Grid Ventures Projects', sets out that the detailed LEMP would include details around a coordinated landscape design on the Saxmundham Converter Station site to enable the function of the outline landscape mitigation to be maintained.</p> <p>Addressing the HDD point specifically, this (and similar) techniques require large working areas to be set up at the launch and receive pits.</p> <p>Due to the increased depth of cables required for HDD and the additional construction space required, the cable separation is greater between cables installed by HDD as opposed to those installed by open cut method, further increasing the working area at each end. Given the likely scenario that landscaping will be required relatively close to the substation then the HDD working areas would likely require greater removal of landscaping than a carefully aligned open cut trench. Cost is not the primary factor for not utilising HDD or similar in this location.</p> <p>Given that open cut trenches can allow for cables to be installed at closer spacings, narrower groupings can be created and aligned to avoid lines of sight into the substation. There are limitations on planting over installed cables however hedgerows and shrubs can be planted or reinstated over cables, where practicable cable alignments can be aligned to intersect planting areas at angles which can assist</p>	

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				in avoiding views of the substations and converter stations from known viewpoints.	
3.7.2	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Discrepancies in the order limits with those of SPR	<p>At present there remains discrepancies between the project's Order Limits around Friston when compared to the Order Limits consented by SPR. This includes the exclusion of areas of landscape mitigation and land required for the diversion of existing public rights of way. This needs to be urgently reviewed should SeaLink's connection Scenario 2 be chosen for the project (i.e. where NGET provides the Friston Substation in the absence of SPR).</p> <p>During the examination of EA1N and EA2, a key topic of concern was whether enough space had been provided within the Order Limits to prioritise a SuDS strategy for managing surface water, for both the construction and operational phases of the projects. ESC raised particular concern about the construction phase, given the areas used in construction would potentially be far greater than that during operation; large swathes of land would be stripped of topsoil and used for construction purposes including compounds and storage. All of these activities have the potential to increase surface water runoff rates and generate sediment which could have a detrimental impact to surface water flood risk in Friston. At that time, the ExA was unable to conclude that the construction drainage scheme would be satisfactory. It is vital that the SeaLink Order Limits and DCO reflect the drainage arrangements and mitigation secured under the SPR DCOs or demonstrate an acceptable alternative solution.</p>	<p>The Order Limits for the Proposed Project around the Friston substation are intentionally different to that of EA1N and EA2 due to the differences in the infrastructure and mitigation proposals required for Sea Link compared to the wind farm projects.</p> <p>By way of context, the Proposed Project includes two scenarios relating to the construction of the National Grid substation at Friston (Kiln Lane). The first scenario (scenario 1) is that the substation is constructed under the SPR EA1N or EA2 consents (with the Proposed Project only needing to build a connection into it), with the second scenario (scenario 2) assuming Friston Substation is built as part of the Proposed Project. The scenario 2 would only occur if the SPR projects do not proceed in the way expected and the National Grid substation is therefore no longer constructed under that consent. The second scenario is highly unlikely to occur, but it is essential that it is considered as it forms a vital component of the Sea Link project for which the Applicant does not currently have consent. Scenario 2 avoids a situation whereby NGET's ability to deliver the required network reinforcement in accordance with its ASTI licence is reliant on the delivery of third-party consents over which the Applicant does not have control.</p> <p>The Order Limits around Friston are largely driven by the infrastructural and mitigation requirements of scenario 2 (whereby the National Grid substation at Friston is delivered under the Sea Link consent), and the areas identified for landscape mitigation reflects the mitigation requirements of the Proposed Project (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). It should be noted that the EA1N and EA2 consents include powers for three substations at Friston, including an air insulated switchgear (AIS) National Grid substation (with a larger footprint than the gas insulated switchgear, or GIS, alternative), and three cable sealing end compounds (CSEs). The Proposed Project application, in scenario 2, seeks powers only for a single substation using GIS technology, and no CSEs.</p> <p>In scenario 2, should only the Proposed Project be developed, the Order Limits are sufficient to allow the required mitigation to be delivered. Should the EA1N and/or EA2 projects be developed alongside the Proposed Project or afterwards, the landscaping could be extended (by SPR) into the additional areas for which SPR benefits from consent for landscaping mitigation. The detailed landscaping designs developed by the Applicant and SPR in this scenario would be coordinated so that they were sufficiently in accordance</p>	Under discussion

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				<p>with the outline plans secured by the different project's respective consents, and to ensure that the functionality of the mitigation required by both consents was retained. It would not be necessary for The Applicant to deliver landscaping that is required to mitigate the landscape and visual impacts of the SPR substations under either scenario; so it is not necessary to include the full area included in the SPR consents in the Sea Link Order limits. Indeed, it would be challenging for The Applicant to seek compulsory acquisition powers over land that is only required to mitigate a third party project given that this is not necessary for Sea Link.</p> <p>The Applicant would like to reiterate that while scenario 2 is necessary to ensure that NGET has all primary consents required to meet the needs case (i.e. including the means to connect into the existing transmission network in the Sizewell area), it is expected that the National Grid substation will be delivered under the extant SPR consents as planned.</p> <p>For scenario 1, Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order [CR1-027] would not be implemented under the Sea Link application. However, Work no. 2 (the underground cable works to connect the substation to the converter station) and Work no. 5 (the underground cable connecting the converter station with the landfall) would be implemented in either scenario. These underground electric cables interact with the area for which SPR benefits from consent for cable sealing end compounds, a drainage pond and limited landscaping as described above.</p> <p>In scenario 1, the landscaping around the substation at Friston would be led by SPR, as the detailed landscaping proposals in this area are developed pursuant to the requirements of the EA1N and EA2 DCOs.</p> <p>The Applicant and the SPR EA1N and EA2 teams are currently working together to understand how best to progress the two projects. The Applicant is progressing detailed consideration of cable alignments at an earlier stage than is necessary for Sea Link to show how the two projects can work together and how a compliant landscaping scheme can be delivered with Sea Link in situ. Once an approach to landscaping is agreed between the parties, an agreement will be required outside the DCO process between the parties on how it could be implemented. This agreement should be sufficiently flexible to manage different scenarios in terms of the order that the three projects are delivered and potential changes to construction programmes (as can occur with all infrastructure projects). For example, if the Sea Link project closely follows EA2, SPR could implement planting that would not be affected by the construction of Sea Link; and The Applicant implement the remainder of the planting following</p>	

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				<p>construction of the Sea Link cables and associated works. Further consideration may be needed if EA1N would affect this planting, particularly if there are differences in the timescales for implementation. This could then occur the other way around in the less likely scenario that Sea Link is developed prior to or alongside EA2.</p> <p>If there is a larger separation between the projects any project may decide to complete planting of some or all of the full masterplan. Sections of this planting may then need to be removed for construction of the later project. Whilst this interplay causes complexity, the Sea Link application demonstrates that the project will be acceptable individually an cumulatively; and with mitigation secured in the DCO so the detail of how this will be achieved is not necessary for a decision to be taken on the Sea Link application.</p>	
3.7.3	<p>Application Document 7.12.1. Design Principles – Suffolk [APP-366]</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3.</p>	Friston Substation - Embedded mitigation in Scenario 2	<p>As currently presented, the draft DCO provides far less protection to the community and the environment under a Scenario 2 connection. The starting point for a project alone connection scenario should emulate the embedded mitigations for the SPR project consents, noting the many longwinded discussions held at the examination leading to the mitigation finally approved. The embedded mitigation under either connection scenario will need to be secured through the DCO.</p> <p>Whilst Scenario 2 presents a substation for Sea Link's connection only at Friston, and it is noted that this would therefore not include the SPR projects which gained consent for two separate substations (one for EA1N and one for EA2's connection, plus a third substation for National Grid), the level of mitigation surrounding the substation site should not be watered down given the existing sensitivities of the local communities and landscape in that area. After all, ESC notes that the ExA for the SPR projects in Section 28.4.4 of the Recommendation Report (Volume 2 – Chapters 18-315) stated - 'The local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance. However, the benefits of the Proposed Development principally in terms of addressing the need for renewable energy development identified in NPS EN-1 outweigh those effects'. ESC wishes to stress that whilst the overarching need case was found to outweigh the adverse effects introduced, the agreed mitigation across the projects were found by the ExA to only just be sufficient. This reinforces ESC's view that NGET should be using the SPR consent as the starting point for their own proposed embedded mitigation, especially in extremely sensitive locations such as the village of Friston. If consented, NGET</p>	<p>The Applicant disagrees that the draft DCO for Sea Link provides less protection to the community and the environment under Scenario 2. The mitigation proposed as part of the Proposed Project is robust and responds to the potential effects identified within the Proposed Project ES. While the mitigation approved under the SPR consents is informative, it is not self-evident that the mitigation proposed for the Proposed Project should emulate that approved under the SPR consents.</p> <p>This is because the SPR projects benefit from consent for a greater extent of development at this location than is being sought by the Proposed Project. As noted elsewhere in this document, the EA1N and EA2 consents include powers for three substations at Friston, including an air insulated switchgear (AIS) National Grid substation (with a larger footprint than the gas insulated switchgear, or GIS, alternative), and three cable sealing end compounds (CSEs). The mitigation areas in the SPR DCOs and the associated design principles and outline strategies secured under the SPR DCOs reflected this. The Proposed Project application, in scenario 2, seeks powers only for a single substation using GIS technology, and no CSEs.</p> <p>Therefore, a different approach to mitigation does not represent a 'watering down' of mitigation, but instead it represents an approach that is commensurate with the development being proposed under scenario 2.</p> <p>Should the National Grid substation at Friston be delivered by the Applicant under scenario 2 and the EA1N and/or EA2 projects developed alongside the Proposed Project or afterwards, the landscaping could be extended (by SPR) into the additional areas for which SPR benefits from consent for landscaping mitigation. The detailed landscaping designs developed by the Applicant and SPR in this scenario would</p>	Under discussion

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			also have a duty to provide an exemplar development (far beyond just adequate), given the national significance and justification being presented in the Applicant's need case. Additionally, they should be setting the bar high for projects for the future to follow their precedent.	<p>be coordinated so that they were sufficiently in accordance with the outline plans secured by the different project's respective consents, and to ensure that the functionality of the mitigation required by both consents was retained.</p> <p>The design principles for the National Grid substation in the Proposed Project application are provided in Application Document 7.12.1. Design Principles – Suffolk [APP-366]. As set out in that document, the design principles relating to the National Grid substation at Friston are indeed derived from those approved under the EA1N and EA2 DCOs. It is noted however that the Design Principles presented in the SPR consents are not suitable for use in their entirety, because the National Grid substation is one element of the wider works and subject to different documents and controls to the SPR projects.</p> <p>For example, some of the SPR design principles are broad concepts which are reflected in the Proposed Project in different ways, or are secured via other documents such as Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 or Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]. Where this is the case, the Proposed Project does not replicate SPR design principles directly. However, consistency has been retained where possible within those constraints.</p> <p>It is also relevant that many of the SPR design principles relate to the design process rather than the designs themselves, and intentional differences relating to process (e.g. for discharging requirements) do not necessarily indicate any differences in the designs.</p>	
3.7.4	<p>Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment</p> <p>Application Document 6.9 Water Framework Directive Assessment</p> <p>Application Document 6.8 Flood Risk Assessment</p>	Assessment conclusions presented in the ES, WFD Assessment and FRA.	<p>ESC draws attention to the historical surface water flooding which has been experienced downstream in Friston. The village has been subject to surface water flooding on multiple occasions. It is important that there is sufficient space on site to accommodate an acceptable construction drainage design in addition to understanding the implications of the operational drainage design and its interaction with the drainage proposals consented under the East Anglia One North and East Anglia Two projects. ESC defers to the Lead Local Flood Authority (LLFA) and Environment Agency (EA) on flood matters but supports the embedded measures.</p> <p>A green field runoff rate means that NGET will not make the existing flood issue any worse, in the same way that SPR were required to do so under their own DCO consents. As the ExA will learn, there is an existing flooding issue in Friston which has been an issue for local residents for many years. It is understood that this primarily links back to the</p>	<p>The Applicant is confident that there is sufficient space on site to accommodate construction and operation phase drainage. The flood risk sensitivity and history of flooding at Friston is detailed in Application Document 6.8 Flood Risk Assessment [APP-292]. The Flood Risk Assessment (FRA) (Table 4.1) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant S19 flood investigation reports. An extract of the modelling data outputs from the BMT study is presented in Plate 4.1 of the FRA, and the data has been used to inform the assessment of surface water flood risk during construction and operation of the Proposed Project (FRA Section 4).</p> <p>Proposed drainage principles are set out in Appendix C of Application Document 6.8 Flood Risk Assessment [APP-292]¹.</p> <p>Final details on drainage are developed at the detailed design stage of the project and are therefore not available in detail</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			existing watercourse not being sufficiently maintained and silting up over time, reducing the capacity to capture and move surface water runoff. This results in flooding during times of heavy rain or ground water saturation.	for the Sea Link project. It is noted that the same was true of the SPR projects, with the design of drainage at the Friston site evolving significantly between the outline designs presented in the DCO applications and the draft drainage proposals to be submitted to discharge SPR's requirements. The Applicant has added an Operational Drainage Management Plan to the list of documents to be discharged under Requirement 6 to provide the Local Planning Authorities with more assurance that they will be involved in the discharge of details on drainage.	
3.7.5	N/A	Legacy benefits associated with reduction in flood risk	ESC considers that this existing and well documented issue presents an opportunity for legacy project benefits, if the project is consented. Reducing existing and known flooding issues in the village of Friston would provide a lasting benefit for the local community and this should be fully explored over and above the requirements of the project. A legacy benefit of this nature would be supported by ESC, however, any such legacy benefit would need to be balanced against any other impacts introduced by the project.	<p>Notwithstanding the fact that the detailed drainage design in general for Sea Link is not being developed at this stage, The Applicant has been working with SPR on the proposed detailed drainage solutions at the site of the three substations that SPR is developing to discharge requirements on their DCOs. It is anticipated that drainage at Friston (Kiln Lane) substation will be that currently being designed (with inputs from The Applicant) as part of SPR's EA2 project in all scenarios where both Sea Link and EA1N/EA2 are progressed; the only question would be which developer constructs the drainage and under which consent. However, the detailed drainage being developed by SPR (with input from The Applicant) is still in draft and is not yet in the public domain so we are not yet able to reflect this in our plans. We are seeking solutions to this and would hope to update documents to reflect the agreed approach during the course of Examination. In the meantime, however, the application provides sufficient detail to demonstrate that a policy compliant and beneficial operational drainage strategy can be designed and implemented at the site under either Scenario.</p> <p>To provide certainty on the outcome, commitment W11 within Appendix B of the Construction Environment Management Plan (CEMP) (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3) secures that <i>"Surface water drainage from permanent above ground infrastructure would be managed and treated using sustainable drainage systems (SuDS) in accordance with policy and guidance requirements of the relevant Lead Local Flood Authorities to include allowances for climate change in accordance with current (May 2022) Environment Agency requirements. These SuDS would be maintained over the lifetime of the Proposed Project and the drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring a significant recharge quantity from one catchment to another."</i></p> <p>Where the Proposed Project interacts with existing issues the Applicant will engage with relevant stakeholders in order to</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				understand the extent of the issues. In this case, with regard to existing surface water flooding, it would be necessary for the relevant modelling to be carried out to ensure that the design of the Proposed Project does not exacerbate the issue. However, as a licenced/regulated business, the Applicant is not able to make specific commitments to undertaking works outside of the Order Limits, noting that provision of community benefits is separate from planning process.	
3.7.6	Application Document 7.10 Coordination Document [APP 363]	Coordination with SPR at the Friston Substation site	ESC asks NGET to explore every opportunity to coordinate the delivery of the Friston substation – evidence for which is relatively lacking at present. The Applicant should be seeking to explore every opportunity to make the delivery of the Friston substation as coordinated as possible, including looking to deliver the substation in one phase. If the substation could be built out to accommodate the consented SPR substation, the Sea Link project, and the LionLink project in one set of works rather than independently and successively, this would clearly shorten the overall length of construction activity impacting local residents.	<p>The Applicant is continually progressing with coordination discussions.</p> <p>Evidence of the Applicant's approach to coordination is demonstrated comprehensively in Application Document 7.10 Coordination Document [APP 363].</p> <p>Details of how the Applicant has interacted with SPR over Friston Kiln Lane Substation are set out in Table 2.25 ESC - Friston Substation of Application Document 9.34.1 (B) Applicant's Comments on Relevant Representations Identified by the ExA [REP2-014].</p> <p>Coordination with other projects and other promoters has been ongoing for several years and has materially influenced the development of the Proposed Project. The outcome of this coordination is a project that has thoroughly explored and, where feasible, delivered a range of opportunities for the reduction of impacts on the environment and host communities. In accordance with NPS EN-1 paragraph 3.3.80 and NPS EN-5 paragraphs 2.13.11, 2.14.2 and 2.15.1 (DESNZ, 2023), The Applicant has considered approaches to coordinate wherever possible with other projects at the strategic and/or project levels to reduce impacts on local communities and the environment.</p>	Under discussion

Table 3.8 Construction Compounds

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.8.1	Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk, [APP-038]	Construction Compounds	ESC has reviewed the indicative location of the construction compounds for the Suffolk Onshore Scheme (illustrated on Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk, [APP-038]). ESC request that NGET seek to coordinate construction compounds with the NGV LionLink project (assuming both are consented) during construction (where timeframes sufficiently overlap), particularly in reference to the co-located converter station site. It is essential that the compounds remain fit for purpose and can accommodate the necessary infrastructure such as that required for drainage. Appropriate mitigation will also be required to protect the amenity of nearby receptors.	<p>The Proposed Project incorporates flexibility in terms of the location of construction compounds at Saxmundham specifically to facilitate ongoing coordination with LionLink.</p> <p>The Proposed Project includes three possible locations for the Proposed Project’s converter station construction compound. This optionality removes the need for The Applicant to pre-judge the outcome of future design work and consultation undertaken by NGV on its projects, and it affords NGV greater scope to consider how its projects could contribute to the development of the wider site in the most appropriate way. It means that the emerging LionLink design is less constrained by design decisions made previously by the Proposed Project. In practice, the optionality allows the final identification of the preferred compound location for the Proposed Project to be deferred at which point more detail may be available (subject to the LionLink project programme) on what LionLink’s routing and siting preferences are.</p> <p>This strategy is set out in Application Document 7.10 Coordination Document [APP-363].</p> <p>The converter station site masterplan in Appendix A of the above Application Document demonstrates how up to three converter stations could be developed, taking account of the likely phasing of works and the location of construction compounds. This masterplan was developed in consultation with NGV, and the Suffolk host authorities with their associated technical specialists.</p> <p>Assumptions around LionLink are commensurate with the stage of that project in its development process (it is understood that LionLink intends to undertake statutory consultation in 2026). The Applicant is maintaining ongoing dialogue with NGV to consider how the design and phasing of the Proposed Project and LionLink project present opportunities for ongoing coordination through project delivery in ways that may reduce impacts on communities and the environment.</p>	Under discussion

Table 3.9 Construction Noise and Vibration – Working Hours

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.9.1	Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]	Core working hours	Throughout the pre-application consultation stages with the Applicant, 0700-1900 Monday to Friday and 0700-1300 Saturday with no activity Sunday or Bank Holidays were the suggested working hours during construction. This aligns with other projects in the district as discussed below and provides residents with a period of respite from construction activity. However, this was changed prior to submission to include Saturday afternoon, Sundays and Bank Holidays, and although the Applicant has reduced the hours a small amount in the application, they still propose 7 days a week working. These amended hours of working are not accepted by ESC.	<p>The Applicant acknowledges concerns regarding working hours but would seek to emphasise that the proposed hours are intended to provide flexibility to carry out works when and where needed.</p> <p>The Applicant requires the necessary flexibility to allow contractors to programme and phase their works, and to accommodate unforeseen construction phase issues without elements of the project being pushed onto the critical path. It is also important that construction activities that are less likely to affect communities, for example works within the superstructure of a converter station building, are not onerously restricted.</p>	Under discussion
3.9.2	Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]	Noise and vibration impacts	With the number of NSIPs in this area and the likely additional impact of SeaLink, residents require respite. SeaLink alone will create a number of significant adverse and adverse effects, although it is noted that the Applicant considers that with mitigation, significant adverse effects are not predicted. This conclusion is yet to be tested. It is crucial, however, that residents get regular breaks in what is a very noise sensitive area and that the proposed development is well managed and controlled. Reasonable hours of work represent one of the key measures to reduce impact on residents and should be seen as such.	<p>The proposed working hours are in part driven by the importance of the timely delivery of the Proposed Project. The Proposed Project is identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. The report considers that important projects, including the Proposed Project, must be accelerated to delivery by 2030 if the clean power goal is to be achieved. The report further identifies that without the Proposed Project consumers could face an extra £1.4b in constraints costs in 2030.</p> <p>Construction work, including that undertaken if and where needed on Sundays and bank holidays, would be suitably controlled by (for example) Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3, and Application Document 9.83 Outline Code of Construction Practice submitted at Deadline 3.</p>	Under discussion
3.9.3	N/A	Cumulative effect of construction hours on the area	<p>The Applicant suggests that longer working hours will result in the project’s construction being completed sooner, but considering the construction impacts of other projects, and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant in any case if all are consented. Whilst we appreciate there is a balance to be struck, respite in these extended durations must be given full consideration. These are not small or isolated developments that once over will see the end to impact, but part of a wider package of works and must be considered as such.</p> <p>Given all other comparable projects provide this respite (including projects promoted by SPR), it would seem obtuse to now start including these periods and creating impact at times where we and other projects have worked hard to prevent it, particularly given the spatial relationship between SPR’s projects and the proposed Sea Link project.</p>	<p>The 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. As such, the threshold is more likely to be exceeded during such periods, assuming the same intensity of works. However, exceedance of the weekend/bank holiday threshold would only be expected for certain construction activities at certain locations at a small number of noise sensitive receptors (NSR), identified as the construction noise and vibration ‘hot-spots’ in Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109] and Application Document 6.4.2.9 (B) ES Figures Suffolk Noise and Vibration [AS-125]. Should weekend or bank holiday working be required at these locations, and where construction noise</p>	Under discussion

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				<p>levels cannot be attenuated to below the threshold with the use of best practicable means (BPM), there is potential for significant adverse effects depending on the duration of exceedance. In such cases temporal restrictions would be put in place, as part of the application of BPM, to ensure that significant adverse effects are avoided, and adverse effects are minimised.</p> <p>Notwithstanding this, it is not anticipated that all types of construction activity will take place on every Sunday or Bank Holiday. There will be restrictions on the type of activity that can occur on these days. The restrictions include limiting Heavy Goods Vehicles (HGVs) and percussive piling activities. Details relating to the proposed construction working hours and any associated restrictions are secured by Requirement 7 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] and further set out in Application Document 6.2.1.4 (D) Part 1 Chapter 4 Description of the Proposed Project [REP1A-003].</p> <p>Furthermore, the Applicant is working with ESC to consider whether there are specific elements of the Proposed Project where further restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in Application Document 3.1 (E) draft Development Consent Order [CR1-027] with the working hours secured in the SPR EA1N and EA2 DCOs. This is recognition of the fact that these works would only be implemented in a Proposed Project scenario 2, a fall-back scenario in which the Applicant would in effect be delivering works that are expected to be delivered under the SPR consents. The scenario 2 would only occur if the SPR projects do not proceed in the way expected (i.e. on-programme), and the National Grid substation is therefore constructed under the Proposed Project consent rather than an SPR consent.</p> <p>It should be noted that the inclusion of Sundays and bank holidays within the core working hours were in fact consulted on during the pre-application stages, specifically in the project-wide July 2024 consultation. Additional Preliminary Environmental Information that considered the effects of these working hours was published as part of this consultation exercise.</p> <p>Also of note is that the principle of working on Sundays and bank holidays has been deemed acceptable by the Secretary of State on previous The Applicant DCOs, including the The Applicant (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</p>	

Table 3.10 Impacts on Health and Wellbeing

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.10.1	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]	Study Area	The Consultee raised no concerns with the study area during statutory consultation, so agreement is confirmed.	The Study Area was set out within the PEIR and has been used for the ES. This study area was also shown at the meeting in October 2023. The study area has been set out within the ES chapter (Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]).	Agreed
3.10.2	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]	Mitigation	<p>The Consultee will review the proposed mitigation for health and wellbeing effects following the submission of the DCO application.</p> <p>ESC is still reviewing this and will confirm its position in due course.</p>	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058] sets out the proposed mitigation.	Under discussion
3.10.3	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]	Assessment conclusions	<p>The Consultee will review the health and wellbeing assessment following the submission of the DCO application.</p> <p>ESC is still reviewing this and will confirm its position in due course.</p>	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058] presents the assessment conclusions.	Under discussion
3.10.4	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]	Cumulative impacts on mental health and wellbeing	It is essential that NGET genuinely engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the Sea Link proposals are likely to further exacerbate these existing issues. A recent survey by Suffolk Mind, commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area. It is important to stress that increases in working hours can have significant adverse effects on people’s health and wellbeing. ESC has continually stressed throughout the pre-submission engagement with the Applicant that district is home to multiple consented, planned and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which can compound the effects on people’s health and wellbeing.	<p>The Applicant recognises the potential for future environmental changes associated with the Proposed Project, and specifically, that increases in working hours particularly during weekends and bank holidays are of considerable concern to residents and the Council with regards to the health and wellbeing of its communities.</p> <p>To address this concern The Applicant has been maintaining ongoing dialogue with ESC and SCC and will seek to address the issue of working hours in the course of thematic meetings with the aim of ensuring that local concerns, including those related to mental health and wellbeing, are appropriately reflected in construction planning and management.</p> <p>The Applicant recognises that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people’s mental health. Throughout the development phase of the Proposed Project, the Applicant has therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, The Applicant has sought to provide certainty on the plans wherever possible.</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.10.5	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]	Impacts on local communities (mental health and wellbeing)	Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents’ mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities.	<p>The health and safety of the public, local communities and employees is central to everything that The Applicant does. Throughout the development of the proposals, the Applicant has carefully evaluated the potential impacts of the Proposed Project on health and wellbeing and, where appropriate, identified means of mitigating any impacts. Further, in addressing this concern to date, the Applicant has undertaken a comprehensive and robust assessment of health and wellbeing within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] of the ES, such that any likely significant effects of the Proposed Project have been identified and mitigated. Section 11.9 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] of the ES adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes.</p> <p>Specifically, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the Institute Environmental Management and Assessment (IEMA) guidance as a “<i>state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity</i>”. The IEMA guidance outlines that both physical and mental health should be considered “<i>across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes</i>”, and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Specifically, mental health is considered under the existing health determinants in the IEMA guidance, with particular relevance given to the following:</p> <ul style="list-style-type: none">• Access to healthcare services and other social infrastructure;• Access to open space, leisure and play;• Transport modes, access, connections and physical activity; and• Social cohesion and community identity. <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses health and wellbeing effects based on the working hours set out in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. No significant adverse effects are identified with regards to human health. This considers embedded mitigation measures, as stated in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Human Health [APP-058] of the ES,</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
				<p>“The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project”. Specific measures to manage and control construction impacts are set out in the Application Document 9.83 Code of Construction Practice submitted at Deadline 3. These have been factored into the health and wellbeing assessment. For example, the Code of Construction Practice confirms that “Construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the project,” including topics such as working hours and noise and vibration reduction measures. The Applicant as part of the DCO submission has also produced a report which sets out how it has approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in Application Document 7.10 Coordination Document [APP-363].</p> <p>The cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which considers working hours, to assess the effects of the Proposed Project in addition to other NSIPs and smaller applications within a study area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing cumulative effects assessment anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-Project assessment of cumulative effects has been assessed as ‘not significant’.</p>	

Table 3.11 Community Benefits and Compensation

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.11.1	N/A	Investment in local community assets	If the scheme is granted development consent by the Secretary of State, there must be adequate compensation for communities that will be adversely affected. The Council would welcome further engagement with the Applicant on this matter. We understand the communities may have ideas on areas to offset or compensate where impacts are directly linked to the project. It is again important to reiterate that SeaLink is not being developed in isolation - there are multiple other projects agreeing compensatory measures, so there is potential for NGET to coordinate compensation associated with SeaLink with other measures proposed by other project promoters.	<p>The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country.</p> <p>In line with Government guidance, published in March 2025, The Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. The Applicant is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner.</p>	Under discussion

Table 3.12 Socio-economics, Leisure and Tourism

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.12.1	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Socio-economics, Leisure and Tourism	<p>ESC is concerned that the cumulative impact of SeaLink in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s).</p> <p>The impact of the SeaLink scheme will clearly not be limited to the immediate vicinity of the proposed landfall, converter station, connection infrastructure and cable corridor locations. There is a high degree of interdependency between visitor destinations, employment, and supply chains within East Suffolk. Visitors move from destination to destination, employees need to access their employment, and the potential for the displacement of visitors during construction should not be ignored. Should this project proceed, it is essential that this impact is appropriately considered, and appropriate mitigation is provided to support the continued success of the visitor economy</p> <p>In October 2022, ESC responded to the SeaLink non-statutory consultation expressing concern over the scheme's potential for negative socio-economic impacts affecting businesses, employment, and the wider economy. This is especially important regarding the potential for cumulative adverse socio-economic effects resulting from multiple energy infrastructure projects scheduled for development in East Suffolk over the next decade. This was echoed in the Statutory Consultation response also. ESC notes that concerns about the cumulative impact of multiple infrastructure projects in East Suffolk are seemingly being taken seriously by the Applicant, and that opportunities for the co-ordination of multiple infrastructure projects and the co-location of infrastructure elements are being explored.</p> <p>However, ESC remains concerned about the potential for adverse socio-economic impacts on individual economic receptors, especially those located within and adjacent to the onshore Order Limits within Suffolk. ESC would expect to see that these impacts on individual receptors, including impacts on holiday rentals, tourist accommodation,</p>	<p>The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism.</p> <p>To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment (EIA), through which no residual significant effects have been identified for Socio-economics, Leisure and Tourism following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] of the ES assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.</p> <p>As noted above, ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, which may include measures to benefit the local visitor economy.</p> <p>Furthermore, Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] of the ES assesses the cumulative impact of the Proposed Project in addition to other NSIPs. The assessment of total inter-project cumulative effects for socio-economics, recreation and tourism has identified that there are six other developments that have potential to result in cumulative effects upon shared socio-economic, recreation and tourism receptors. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required.</p> <p>Additionally, the Applicant notes that ESC has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			<p>farms and businesses directly affected by the changes, be appropriately mitigated and compensated where impacts are forecast.</p> <p>ESC notes that spend by tourists and construction workers can be expected to be significantly different. The displacement of tourists by workers is therefore likely to significantly disrupt the local economy, with the high number of independent shops, cinemas, restaurants, museums etc. less likely to be accessed by workers than tourists. In order to mitigate this impact, NGET should work collaboratively with ESC and the host communities to assess these impacts and establish suitable strategies to encourage workers to spend locally.</p> <p>ESC is concerned about the impact of the additions of Sundays and bank holidays to the core working hours in relation to socio-economic activity, specifically East Suffolk's tourism industry.</p>	<p>of other NSIPs and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. A review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005].</p> <p>The Applicant notes the Council's concern regarding the potential for adverse impacts on individual businesses, employment and the wider economy. The assessment of socio-economics, recreation and tourism effects set out in Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [REP1A-005] which considers the impact on employment generation (locally and within the supply chain), gross value added (GVA), individual business premises and visitor and tourism accommodation capacity. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] also concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no additional mitigation will be required.</p> <p>Impacts on business premises, including holiday lets, are assessed within a 500 m study area from the Proposed Project's Order Limits, which is in line with recognised guidance (such as DMRB LA112). In addition, any receptors beyond 500 m which were impacted by the Proposed Project were assessed. Economic impacts (employment generation, GVA and visitor and tourism accommodation) were assessed within a 60-minute drive time of the Suffolk Onshore Scheme, in line with research by the Chartered Institute of Personnel and Development (CIPD), which found that 90% of national employees commuted for 60 minutes or less each way.</p> <p>The Applicant notes the local concerns set out by ESC regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, such that any likely</p>	

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				<p>significant effects of the Proposed Project have been identified and mitigated. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] of the ES considers potential severance of access to residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment of severance is informed by the findings in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], whereby it is not anticipated that the Proposed Project would have any traffic and transport impacts on Sundays/Bank Holidays. Construction working hours will be between 7am and 5pm on Sundays and Bank Holidays. With a limit of 30 HGVs a day, on average there is anticipated to be a maximum of three HGV movements an hour. HGV movements of this rate per hour would not be noticeable and highly unlikely to deter business activity. As a result, any impact of HGVs on local businesses during Sundays and Bank Holidays will not lead to any anticipated significant effects.</p> <p>In addition, recognising that PRoW and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including:</p> <ul style="list-style-type: none">• the quality of user experience;• quality of the route;• purpose of usage; and• potential for substitution. <p>Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated with the inclusion of working hours on Sundays and Bank Holidays.</p>	
3.12.2	<p>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk</p>	Assessment of Visitor and Tourism Economy	The Consultee's statutory consultation response outlines ' <i>The Consultee is concerned that the impact of Sea Link in combination with other significant infrastructure projects proposed and consented in the locality will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination, ultimately adversely affecting the visitor economy</i> '. This position was repeated in the Consultee's response to the additional statutory consultation July-August 2024.	The assessment of cumulative effects on tourism is assessed in the ES Cumulative impact assessment chapters of the ES (Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]).	Under discussion

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	Onshore Scheme Inter-Project Cumulative Effects [APP-060]		<p>The increases to the proposed core working hours exacerbate this concern.</p> <p>ESC in their Relevant Representation have also maintained this concern that the cumulative impact of Sea Link in addition to the other proposed energy projects will negatively affect the visitor experience, damaging the reputation and perception of the district as a holiday destination. This negative perception will seriously affect the visitor economy throughout the lifetime of the project(s).</p>		
3.12.3	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].	Baseline	<p>ESC considers it is in a unique position, with many consented NSIPs and Sizewell etc. ESC has pointed out that the area it is in is different in terms of intensity considering the number of cumulative schemes. The usual approach to baseline gathering may not be appropriate given that East Suffolk is not like everywhere else from that perspective.</p> <p>The Consultee does not agree with National Grid's position on desk-based analysis for gathering baseline information being the most appropriate.</p>	<p>The Applicant appreciates the unique situation that ESC find themselves in. The Applicant is confident that the desk-based analysis presented in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] is sufficiently robust.</p> <p>The Applicant's approach and methodology aligns with the guidance provided by SCC on PRow assessment methodology. The Applicant recognise that certain effects can only be evaluated on a qualitative basis, and this is presented in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]. The Thematic meetings held to date provide an opportunity to discuss key aspects of local context which have helped to inform the assessment.</p> <p>The Applicant has submitted the socio-economic, recreation and tourism assessment as set out in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].</p>	Under discussion
3.12.4	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].	Assessment of effects methodology (except PRow and Visitor and Tourism Economy)	The Consultee will review the assessment methodology following the submission of the DCO application.	The Applicant has set out the socio-economic, recreation and tourism assessment methodology in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] .	Under discussion
3.12.5	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].	Assessment conclusions	The Consultee will review the socio-economic, recreation and tourism assessment following the submission of the DCO application.	The assessment conclusions of the socio-economic, recreation and tourism assessment are set out in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] .	Under discussion
3.12.6	N/A	Engagement on socio-economic and tourism issues	The Consultee has been disappointed with the quality of engagement on the proposals, both with technical departments and with the community, particularly around socio-economic and tourism issues.	<p>The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with SCC and ESC. The thematic meetings provided an opportunity for the local planning authorities to raise questions and concerns as well as discussing important points of local context to inform the assessment.</p> <p>The Applicant is willing to work collaboratively with the Council. The Applicant will, in collaboration with its main works contractors, develop and implement a Social Value strategy. As the Proposed</p>	Under discussion

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				<p>Project develops, the detail of the approach can be shared and discussed with a view to benefit the local economy.</p> <p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.</p> <p>The Applicant is a regulated business and needs to demonstrate the planning case for such requirements on each of its projects. Under its licence obligations, the Applicant needs to demonstrate to Ofgem how it is being economic and efficient in the interest of bill paying consumers. It is not considered that a specific Employment, Skills and Education Strategy is required for this project and would be disproportionate to the scale of the potential effect and The Applicant's licence obligations.</p> <p>Outside of the DCO the Applicant is working to fully understand the wider, regional scale of labour and skills demand in the region in order to develop more sustainable interventions in this regard.</p> <p>Also, outside the DCO process, the Government published guidance on community funds for transmission infrastructure in March 2025 (UK Government, 2025). In line with this, the Applicant is set to engage with local stakeholders and communities in 2026 to understand their local priorities and help shape plans for delivering meaningful benefits, should the Proposed Project receive consent. This engagement will identify what matters most locally, which could include support for education, training, and skills.</p>	
3.12.7	N/A	Engagement with economic development agencies and the Council	<p>The Consultee would welcome the opportunity to re-engage with the applicant to discuss and encourage a collaborative approach to maximising the potential economic benefits of the scheme; whether arising through increased local spend across the supply chain or to develop and deliver appropriate skills and apprenticeship opportunities.</p> <p>In addition, appropriate mitigation strategies need to be considered and implemented if the potential negative effects affecting the accommodation sector, workforce displacement or visitor perception are to be addressed.</p>	See Applicant's response in the row above.	Under discussion
3.12.8	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Available workforce	<p>Workforce displacement from local infrastructure development in East Suffolk is already in evidence across a broad swathe of industry sectors and job roles.</p> <p>Sizewell C anticipates a peak construction workforce of 7,900 individuals which is likely to affect workforce</p>	The Council's concerns regarding employment displacement and churn are noted. As set out in Table 10.23 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. Given the scale of	Under discussion

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	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]		<p>availability and the ability of businesses to recruit into vacant roles, impacting business operations and output.</p> <p>NGET needs to work with ESC to quantify these potential impacts at both the macro and micro level, and indicate how it intends to mitigate these impacts when, and if, they occur.</p>	<p>the local construction workforce in the 60-minute drive time, the level of additional employment generation by the Suffolk Onshore Scheme is relatively low and therefore workforce displacement is assessed to be limited.</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects. Table 13.43 of the inter-project cumulative effects assessment sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.</p>	
3.12.9	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Assessment of workforce availability and request for a Skills and Employment Plan	<p>The Consultee is in agreement with SCC and fully supports the expectation of 'a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects.</p> <p>In addition, the development of an appropriate Skills and Employment Plan is essential if local opportunities are to be realised.</p>	<p>While detailed information on the specific skills required at each construction or operational phase is not available, Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] has applied a worst-case assessment approach. This ensures that any potential effects on the local labour market, including displacement and churn, are appropriately considered. With an average of 65 net additional jobs required during construction and approximately six personnel on-site during operation, impacts on the supply chain, workforce displacement and churn are expected to be negligible, due to the limited scale of labour demand.</p> <p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.</p> <p>The number of jobs supported by the project is relatively low and short-term, when considered in isolation. When considered in the context of the Applicant's wider projects in the region, the Applicant believes there could be a more effective approach to leveraging benefits. Outside of the DCO, the Applicant is therefore committed to exploring opportunities for regional interventions in skills and employment. This supports the overriding need to consider skills at a functional economic market area scale that is representative of how construction and maintenance labour markets operate and enables better long-term planning for transferable and sustainable skills and careers in growth sectors identified by the Local Authorities.</p>	Under discussion

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				Outside of the DCO the Applicant is working to fully understand the wider, regional scale of labour and skills demand in the region in order to develop more sustainable interventions in this regard.	
3.12.10	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Scope of the assessment – operational employment	The Consultee considers that operational employment despite being less than during construction will, nevertheless, have the potential for positive economic benefit locally, and should be considered in combination with the operational requirements of other planned NSIPs.	The decision to scope out operational employment on the basis that it will generate negligible employment has been supported by the Planning Inspectorate. As set out in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003] of the ES, the proposed converter stations would be operated by a small team based on site. In general, a minimum of two operators would be present at all times. During normal operation there would be approximately six personnel on site, divided between three shifts over a 24-hour period.	Under discussion
3.12.11	N/A	Skills and Employment Plan	A comprehensive Skills and Employment Plan is essential when looking to maximise the benefits and minimise the negative impacts of the development. This plan will need to be considered in parallel with other existing and planned Skills and Employment Plans for east Suffolk.	<p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.</p> <p>The Applicant is a regulated business and needs to demonstrate the planning case for such requirements on each of its projects. Under its licence obligations, the Applicant needs to demonstrate to Ofgem how it is being economic and efficient in the interest of bill paying consumers. It is not considered that a specific Employment, Skills and Education Strategy is required for this project and would be disproportionate to the scale of the potential effect and The Applicant's licence obligations.</p> <p>The number of jobs supported by the project is relatively low and short-term, when considered in isolation. When considered in the context of the Applicant's wider projects in the region, the Applicant believes there could be a more effective approach to leveraging benefits. Outside of the DCO, the Applicant is therefore committed to exploring opportunities for regional interventions in skills and employment. This supports the overriding need to consider skills at a functional economic market area scale that is representative of how construction and maintenance labour markets operate and enables better long-term planning for transferable and sustainable skills and careers in growth sectors identified by the Local Authorities.</p>	Under discussion
3.12.12	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Impacts on visitor perception and the environmental quality of an area for recreational activity	<p>Tourism is one of the largest business sectors in east Suffolk.</p> <p>The impact of the development on visitor perception and the environmental quality of East Suffolk for</p>	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are a source of concern for local tourism. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The	Under discussion

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			<p>recreational and cultural activity remains the single most important concern for the visitor economy.</p> <p>ESC is investing in technology to monitor visitor perception and behaviours over the long term and remains determined to ensure that the visitor economy continues to evolve positively and sustainably, offering a high-quality experience for visitors and providing well-paid, skilled jobs for residents.</p>	<p>assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.</p> <p>Additionally, the Applicant notes that the Council has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. The Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].</p>	
3.12.13	N/A	Accommodation of construction workers	<p>Sizewell C is expected to have a peak construction workforce of 7,900 workers, of which an estimated 2,900 of the non-home-based workers are expected to live off site. This requirement when combined with an estimated workforce accommodation requirement for the Suffolk Onshore Scheme of 86 workers, although relatively small, could adversely affect an overstretched accommodation sector.</p> <p>The potential for displacement of visitors from East Suffolk through a lack of serviced accommodation is quite possible. In addition, pressures on the availability of affordable housing for residents needs to be considered.</p>	<p>The Applicant notes the Council's concern regarding the potential for adverse impacts on tourist accommodation. Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] conducts an assessment to evaluate whether existing hotel, bed and breakfast, and inn accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. The assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme, and therefore no additional mitigation will be required. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060] also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all</p>	Under discussion

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			<p>Appropriate forecasting and mitigation planning needs to be developed in parallel and in consideration of planned NSIP's and the needs of other businesses and residents.</p> <p>ESC notes that the applicant's own Suffolk Onshore Scheme Inter-Project Cumulative Effects document suggests that in a 'worst case scenario' where the peak construction workforce for the Suffolk Onshore Scheme and the construction of other developments, including Sizewell C, coincide, there would be negligible impact on the hotel, bed and breakfast, and inns accommodation sector.</p> <p>However, the Council is concerned that these conclusions are premature and that the impacts cannot be adequately assessed until such time that the timings of peak construction for Sizewell C and the Suffolk Onshore Scheme are confirmed.</p> <p>Sizewell C is expected to have a peak construction workforce of 7,900 workers, of which an estimated 2,900 of the non-home-based workers are expected to live off site. This requirement when combined with an estimated workforce accommodation requirement for the Suffolk Onshore Scheme of 86 workers, although relatively small, will adversely affect an overstretched accommodation sector.</p>	workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor.	
3.12.14	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Adverse socio-economic impacts	<p>ESC remains concerned about the potential for adverse socio-economic impacts on individual economic receptors, especially those located within and adjacent to the onshore Order Limits within Suffolk. ESC would expect to see that these impacts on individual receptors, including impacts on holiday rentals, tourist accommodation, farms and businesses directly affected by the changes, be appropriately mitigated and compensated where impacts are forecast.</p> <p>The potential for long-term impacts on Saxmundham's high street economy is especially concerning, given the town's role as a local service centre and its alignment with East Suffolk Council's ambitions for economic growth.</p>	The assessment of socio-economics, recreation and tourism effects set out in Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] . Impacts on business premises, including auxiliary businesses associated with farms and holiday lets, are assessed within a 500m study area from the Proposed Project's Order Limits, which is in line with recognised guidance (such as DMRB LA112). The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] . No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.	Under discussion

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3.12.15	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Impacts from the displacement of tourists	ESC notes that spend by tourists and construction workers can be expected to be significantly different. The displacement of tourists by workers is therefore likely to significantly disrupt the local economy, with the high number of independent shops, cinemas, restaurants, museums etc. less likely to be accessed by workers than tourists. In order to mitigate this impact, NGET should work collaboratively with ESC and the host communities to assess these impacts and establish suitable strategies to encourage workers to spend locally.	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] of the ES assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on tourist and visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no additional mitigation will be required.</p> <p>Additionally, the Applicant notes that ESC has expressed concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. A review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005].</p>	Under discussion
3.12.16	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005]	Impact of construction hours on recreation and tourism	ESC is concerned about the impact of the additions of Sundays and bank holidays to the core working hours in relation to socio-economic activity, specifically East Suffolk's tourism industry.	The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified in relation to these working hours following the application of appropriate mitigation. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism.	Under discussion

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				<p>This considered potential severance impacts on access to recreational routes and PRow, residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment considered construction activities taking place on Sundays and Bank Holidays and has been informed by the findings in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport Chapter 7 Traffic and Transport [APP-054]. It is not anticipated that the Proposed Project would give rise to any material traffic and transport impacts on these days. Construction working hours will be between 7am and 5pm on Sundays and Bank holidays, with a limit of 30 HGVs a day equating to on average no more than three HGV movements per hour. This low level of vehicle activity is not expected to be perceptible and is unlikely to deter or disrupt local business activity. As a result, the assessment concludes that there would be no significant socio-economic effects arising from construction activities on Sundays and Bank Holidays.</p> <p>In addition, recognising that PRow and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-005] assesses the potential effects of the Proposed Project on disruption to the use of PRow and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRow and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including:</p> <ul style="list-style-type: none">• the quality of user experience;• quality of the route;• purpose of usage; and• potential for substitution. <p>Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated with the inclusion of working hours on Sundays and Bank Holidays.</p>	

Table 3.13 Ecology

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	The Applicant Current Position	Status
3.13.1	<p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments submitted at Deadline 3.</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p>	Breeding and Wintering Birds	<p>In reference to Breeding and Wintering Birds, the assessment of impacts in the Applicant’s submission appears to be based on incomplete survey coverage which lowers the level of significance assigned to the impacts identified.</p> <p>In addition, mitigation measures (habitat creation – tree and hedgerow planting) proposed for breeding will only be of very limited value to most farmland bird species, again influencing the level of significance of the impacts identified on this receptor.</p>	<p>The purpose of the wintering and breeding bird surveys was not to census every field, but to generally characterise the bird populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. Two years of breeding bird survey was undertaken (whereas for many projects only one year is undertaken) while in some areas three seasons of wintering bird survey was undertaken. The geographical and temporal scope of the surveys provided a good understanding of bird assemblages.</p> <p>The Proposed Project ornithologists ensured their transects coincided with the key areas where the Proposed Project activity would be undertaken and/or where habitat of particular interest to breeding or wintering birds would be present. This included paying attention to crop rotations, such that fields that were arable in some years but fallow in others were surveyed and the opportunistic use of those fields by woodlark was noted, along with the change in nesting locations by other Schedule 1 birds such as hobby. Many of the affected fields in particular parts of the survey area have similar features, and the bird assemblage is unlikely to differ radically at an individual field scale.</p> <p>The Applicant is confident that it has good survey coverage of the Order Limits and a good knowledge of the ornithological interest of the area. It is therefore considered highly unlikely that the value assigned to ornithology in the ES chapter (varying between regional and national importance depending on location) would be raised further if additional survey was undertaken and there is no reason to consider that impacts have been missed or downgraded. Although this comment has also been linked by ESC to the Habitats Regulations Assessment (HRA), Natural England have not raised any concerns on this in their relevant representation.</p> <p>Regarding the role of hedgerows and trees in farmland bird mitigation, the comment is correct but there would also be 12 hectares of off-site arable enhancement provided for ornithology mitigation. This is secured through Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045], and measure B40 of Application Document 9.84 Register of Environmental Actions and Commitments submitted at Deadline 3. The location of habitat creation is shown within the maps for</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].	
3.13.2	Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108]	Hazel Dormouse	In reference to Hazel Dormouse, further survey work is needed to investigate potential presence of this species along part of the cable route. The absence of this means that the ES impact assessment conclusion cannot be relied upon.	<p>The Applicant has undertaken a dormouse survey that in most areas exceeded guidance as it existed at the time the survey was undertaken. That survey did not confirm presence of dormouse, and reference to other dormouse surveys in East Suffolk and previous discussions with ESC have not identified that one would expect to have found hazel dormouse, except for a single desk study record from 2017.</p> <p>During surveys for the Proposed Project, a single record of a 'possible dormouse' nest was made in Area D in October 2024. This record denotes that the nest was not characteristic, and it was not possible to resolve it to a particular species. Further survey would not necessarily aid this characterisation (since it could well remain unresolvable to species). Paragraph 7.1.1 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045], and paragraph 1.5.7 of Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108] already identify that survey would need repeating prior to vegetation clearance but this is intended as part of pre-construction work rather than to inform the impact assessment for the ES.</p> <p>As a precaution, Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047] paragraphs 2.9.87 and 2.9.88 assumes that dormice could be present (despite the fact the survey did not confirm presence) and a precautionary method of working has been set into Application Document 9.84 Register of Environmental Actions and Commitments submitted at Deadline 3 measure B14. This is a standard way of dealing with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition). Given there is a low expectation of encountering dormice this is considered appropriately precautionary.</p> <p>In the long-term there will be a substantial net increase in the amount of habitat available for dormice. Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] includes several measures to ensure continued connectivity for bats during construction and some of these (such as instant hedges) could be used in Area D, to ensure hedgerow connectivity for any possible dormice. This could include closing the haul route at night in that location if deemed necessary.</p>	Under discussion
3.13.3	Application Document 6.2.2.2 (C) Part 2 Suffolk	Bats	In reference to Bats, concerns remain that equipment failure during surveys has limited the results collected and that in turn has resulted in the number of bat species and/or amount of bat	Although some localised equipment failures did occur, additional survey effort was deployed to address it, and across the survey area, the survey exceeded the minimum	Under discussion

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	Chapter 2 Ecology and Biodiversity [REP1-047]		<p>activity being under recorded. This may have resulted in insufficient mitigation measures being identified and the significance of the impacts being underestimated.</p> <p>Whilst it is acknowledged that the Applicant proposes to mitigate at all hedgerow crossing points as though those hedgerows had been assessed as 'Important' for bats, the Council's experience from other NSIPs is that this mitigation can be technically more difficult to implement and therefore may not be practical in all crossing locations. It is therefore important that it is understood which hedgerows are actually 'Important' for bats so that it can be ensured that these are properly mitigated throughout the delivery of the project.</p>	<p>standard required in guidance at that time. As explained in paragraph 2.7.48 and 2.7.49 of Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047] the Applicant has graded the mosaic of habitats within the survey area as of National or Regional importance for bats (depending on grading method used) and at least nine species were recorded including species often difficult to detect such as barbastelle bat.</p> <p>Therefore, the Applicant does not consider that any further data is necessary to broadly characterise the interest of the Order Limits, and it is very unlikely that a grading above regional/national importance would be appropriate.</p> <p>Moreover, given the nature of the Proposed Project impacts (temporary hedgerow gaps) and the fact all hedgerows are being treated as important for bats (irrespective of bat records on that hedgerow) the Applicant does not consider any further mitigation would be identified or needed. Overall, the bat surveys for the Proposed Project included 339.5 nights of static detector data. Minimum total requirements overall if 5 nights had been achieved on every transect, every month, would be 315 nights, so across the Order Limits as a whole the Applicant has 24.5 nights of extra data upon which conclusions have been based.</p>	
3.13.4	Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]	Aquatic Macrophytes	In reference to Aquatic Macrophytes, it is unclear why these have been assigned 'District' importance in the ES when no notable or protected species were recorded?	If the importance were to be downgraded from 'District' importance, this would not change any of the conclusions in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047] with regards the significance of effects.	Under discussion
3.13.5		Biodiversity Net Gain	<p>In reference to Biodiversity Net Gain (BNG), although the legal BNG obligations for NSIPs are expected to be introduced in May 2026, the Applicant has stated in Document 6.12 Biodiversity Net Gain Feasibility Report [APP-297] that "National Grid's approach to BNG for NSIP projects is to:</p> <ul style="list-style-type: none"> o meet the policy requirements within the current NPS; • deliver its corporate commitments to deliver at least 10% BNG with wider benefits; • maximise the benefits and value from consumer funded BNG; and • follow the spirit of the Town and Country Planning Application (TCPA) BNG legislation and guidance, including using the Statutory Biodiversity Metric." <p>National Grid also propose to deliver BNG both on-site and off-site, with off-site biodiversity net gain delivery including the purchase of biodiversity units from commercially registered providers. The Government is currently consulting on biodiversity net gain for nationally significant infrastructure</p> 	<p>The Applicant is committed to playing its part in halting and reversing the decline of biodiversity in the UK and to achieving 10% biodiversity net gain (BNG) on major projects. The Applicant has made this commitment on a voluntary basis in advance of the requirement being mandatory for Nationally Significant Infrastructure Projects. The initial approach taken to BNG on the Proposed Project is explored in the Biodiversity Net Gain Report submitted with the application. How this is delivered through a combination of on-site measures, off-site measures that will be determined when the detailed design is complete and the final effects and potential for delivering BNG on site is clear. Noting that ESC emphasises the importance of on-site delivery, the Applicant will explore the provision of on-site BNG where:</p> <ul style="list-style-type: none"> a) it is on land in its ownership such as around sub-stations, converter stations or sealing end compounds; 	Under discussion

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			<p>projects.⁶ This consultation details the Government's proposals to allow NSIP developers to deliver BNG on-site or off-site in the first instance, but the purchasing of statutory biodiversity credits is proposed to be permitted only as a last resort.</p> <p>Whilst appreciating that legal BNG obligations have not yet been introduced for NSIPs, ESC wishes to emphasise the importance of BNG being delivered on-site wherever possible, and that where this is not possible, off-site but local BNG should be delivered, with biodiversity credits only purchased when on-site and off-site delivery options have been exhausted to the satisfaction of the Council.</p> <p>In any case, ESC is of the view that more information is needed on how the project is going to achieve its minimum 10% Biodiversity Net Gain commitment in Suffolk, and how that is going to be secured and monitored in line with National Grid's commitment to managing and maintaining BNG for at least 30 years.</p>	<p>b) it is in locations where it can also meet requirements for environmental mitigation, such as landscape screening; and,</p> <p>c) where the location of any on-site BNG would not prejudice future site expansion needs or customer connections into the site.</p> <p>The Proposed Project has committed to deliver 10% BNG in both Suffolk and Kent. The Proposed Project will aim to secure off-site BNG requirements prior to the operation of the assets. This timeline will allow for the Proposed Project to deliver the best outcomes for biodiversity, as well as the consumer who is ultimately funding the BNG delivery. This timeline also allows for stakeholders, such as conservation charities time to audit land holdings and outlines aspirational targets, including but not limited to, land purchase for the creation of new nature reserves that could be funded by the Proposed Project.</p> <p>To support delivery of the Applicant's BNG commitments for their strategic infrastructure projects, the Applicant will be setting up a framework in England for provision of off-site BNG with wider environmental and societal benefits.</p> <p>Through this framework, the Applicant aims to partner with organisations capable of delivering high-integrity biodiversity units, covering area habitats, linear habitats, and watercourses, that also generate measurable benefits for nature and local communities. Responsibility for implementation, management, and reporting will lie with experienced conservation bodies and land managers whose core expertise aligns with these aims.</p>	
3.13.6	N/A	Habitats Regulations Assessment	<p>In reference to the HRA, concerns remain about bird survey coverage and the impact that has on assessment of impacts, being of relevance to the HRA as well as the ES.</p> <p>ESC notes the Government's plans, put forward in the Planning and Infrastructure Bill, to establish a Nature Restoration Fund as an alternative method for developers to deliver environmental mitigation. ESC wishes to emphasise that, if SeaLink were to be granted Development Consent by the Secretary of State, the delivery of environmental mitigation on-site is essential to properly mitigate impacts on the highly ecologically valuable and sensitive areas that will be damaged by the proposals.</p>	<p>See above for response on bird surveys. Although the bird survey comment has also been linked by ESC to the HRA, Natural England have not raised any concerns on this in their relevant representation.</p> <p>Regarding delivery of environmental mitigation on-site and the possible Nature Restoration Fund, the Applicant considers that the application delivers the necessary and appropriate environmental mitigation on-site and therefore reliance on the Fund would not be required.</p>	Under discussion
3.13.7	Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-338]	Trenchless techniques	The Consultee has agreed to the trenchless techniques as set out in the REAC and oCEMP. Noting that strict timings for the setup of the compound on land south of North Warren are required to address potential adverse impacts on statutory designated nature conservation sites.	The Applicant has confirmed trenchless techniques will be used for crossing the SSSI/RSPB reserve and will be a commitment in the DCO. This is secured in the Offshore Outline CEMP (Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-338]) and the Register of Environmental Actions and Commitments (Application Document 9.84 Register of	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Application Document 9.84 Register of Environmental Actions and Commitments submitted at Deadline 3			Environmental Actions and Commitments submitted at Deadline 3).	
3.13.8	Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk	Skylark nesting	The survey findings are consistent with the Consultee's understanding of skylark presence in the local area. Proposed mitigation land for this species within the DOL is noted.	Bird surveys have recorded many nesting skylarks in fields across the survey area. Mitigation is included within the DCO Order Limits in the form of a field for delivery of skylark plots at twice the rate required by Countryside Stewardship. This is secured within Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [REP1A-027], within the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045])	Agreed
3.13.9	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1045] Application Document 6.3.2.2.A ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]	Hedgerow survey	It was requested that when undertaking hedgerow surveys, National Grid should not simply report 'units' but quantify extents e.g. in square metres. It was noted that in addition to the standard botanical and historical criteria for defining 'Important Hedgerows' Suffolk has developed some additional criteria. These were subsequently confirmed to be '200 (or more) bat passes, or 5 (or more) barbastelle passes, in a single survey'. This is used to identify hedgerows that would justify additional mitigation measures (e.g. further narrowing of the corridor width and use of temporary features like hazel hurdles or similar to fill gaps overnight). It should be noted there is also a criterion in the latest Bat Conservation Trust survey guidance. These criteria are used as part of the assessment presented in the ES.	Approach to hedgerow survey confirmed and data shared with the Consultees. Each specific important hedgerow has been identified in DCO documentation (Application Document 6.3.2.2.A ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]) including using the additional criteria identified by the Consultees. Impacts are quantified in extent (i.e. metres). In order to enable gaps to be closed for bats, crossing methods suggested by the Consultees including hurdles to be placed at night have been included in the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]).	Agreed
3.13.10	N/A	Important hedgerows and construction compounds at the Converter Station Site	The Consultee considers that potential compounds 04/05 are not acceptable because they would affect an Important Hedgerow, compared to compounds 02 and 03 which are in an open arable field.	The Applicant can confirm compounds 04/05 are only included in the DCO in case Nautilus comes back to Aldeburgh. Latest confirmation is that Nautilus intends to go to Isle of Grain, which would favour using compounds 02 or 03 for the Proposed Project.	Under discussion
3.13.11	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Content of Outline LEMP regarding construction mitigation	The Consultee questions as to whether construction period mitigation measures should be included in the Outline LEMP since this may necessitate partial discharge of the LEMP.	The Applicant has considered this and confirm the current approach for the Outline LEMP is to include construction period measures which will come forward in a detailed LEMP under Requirement 6 of the draft DCO. This is consistent with other NSIP project Outline LEMPs that have been reviewed.	Under discussion
3.13.12	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Acid grassland mitigation area	Expressed preference for the acid grassland enhancement area within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty AONB to be retained for at least 30 years rather than 10 years, or for the landowner to be encouraged to retain the enhanced acid grassland following the 10-year mitigation period.	The enhanced acid grassland mitigation area is secured for 10 years because it is mitigation for a temporary impact that will have long ceased by 10 years This is secured within the oLEMP (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk). However, The Applicant will encourage the landowner to retain habitat that has been created. This is not a formal	Under discussion

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				commitment but could be done through discussions with the landowner during the 10-year management plan of the Site.	
3.13.13	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Deer	The Council agrees with SCC’s position on this matter. Additional mitigation requirements should be detailed in the CEMP and LEMP as appropriate.	Paragraph 6.4.2 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] does refer to use of deer fencing to protect planting.	Under discussion

3.2 Other Areas of Discussion

Draft DCO

Table 3.14 Draft DCO

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.1	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Article 1	The Consultee states that wording is required in the DCO to remove National Grid’s right to carry out works where SPR has already carried out the works.	<p>Schedule 1 provides for the construction of a new substation at Grove Wood, Friston. The Suffolk substation already has the benefit of development consent pursuant to the SPR Orders but is included to ensure a comprehensive consenting position. The Applicant will not build out these works if they have been built out pursuant to SPR's DCOs. Schedule 1 has been drafted to give sufficient certainty in the works required in either scenario, or the scenarios are also discussed in the Environmental Statement.</p> <p>The Applicant is subject to a statutory duty to be economic and efficient so would not carry out works that are not required.</p>	Under discussion
3.14.2	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Article 1 definitions (page 6)	The Consultee states that the current definition of maintain is very broad and questions if it needs to be this broad.	The definition is precededented by the made Bramford to Twinstead Order and Yorkshire Green Order. The definition makes it clear that the power to maintain does not allow for the removal, reconstruction or replacement of the whole of the authorised development; so is limited to maintenance activities.	Agreed
3.14.3	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art.2(1) “pre-commencement operations”	<p>The Consultee notes on the ‘pre-commencement operations’ that the Explanatory Memorandum describes pre-commencement operations as “<i>either de minimis or [having] minimal potential for adverse impacts</i>”. The current list in the DCO is substantial and includes activities that may have more than minimal effects and do not appear to be de minimis. The Consultee states that further discussion on this section is needed.</p> <p>Additionally, the Consultee is unsure if demolition of buildings should be included as a pre-commencement activity and asks if National Grid have identified any buildings that will need to be demolished prior to commencement. The Consultee would welcome more information on this.</p> <p>The Consultee also raises the question if this should include the erection of temporary buildings and structures.</p>	<p>The Applicant confirms that the works described as pre-commencement operations will be explained and justified in the Explanatory Memorandum to be submitted with the DCO Application, which should resolve some of the clarifications requested here. However, The Applicant would welcome further discussions if these details remain unclear.</p> <p>The Applicant has not identified any buildings that would need to be demolished. If this is to be required, it would be due to unforeseen circumstances.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
			<p>The Consultee questions what is meant by ‘site clearance’ and if this means the removal of trees, hedgerows and scrubs, or ground works and should this also include site preparation works.</p> <p>The Consultee questions what ‘set up works associated with the establishment of construction compounds’ includes.</p> <p>The Consultee requests that ‘environmental mitigation measures’ should be defined within article 2.</p> <p>The Consultee notes that landscaping is not included here as a pre-commencement activity. If early mitigation planting is intended, it may be advisable to include that here.</p> <p>The Consultee raises concern over the construction of compounds without any LPA involvement as a pre-commencement condition, as construction compounds can be significant and potentially requiring elements like drainage.</p> <p>The Consultee requests that further discussion on temporary accesses is needed. A new temporary construction access can be significant and can require associated elements like drainage.</p>		
3.14.4	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 3(4) (page 9)	The Consultee has stated it would be helpful if a list of buildings which are proposed to be demolished could be provided.	The Applicant has not identified any buildings that would need to be demolished so if this is required, it would be due to unforeseen circumstances.	Agreed
3.14.5	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 3(4) (page 9)	The Consultee questions why ‘general accordance’ is used and not just ‘in accordance’ and asks what the scope of ‘general’ is.	The Applicant confirms that this wording has been removed in response to this comment.	Agreed
3.14.6	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 5 (page 9)	The Consultee queries the acceptability of a 6 m limit of deviation for pylons, and requests that clarification should be made and justification for this figure provided, and this deviation reduced.	<p>The 6 m limit of deviation for the height of overhead line towers is considered reasonable to provide flexibility in design, allowing for the installation of two additional panels if required. Similar levels of deviation have been used in previous The Applicant DCOs, for example Yorkshire Green DCO includes a 6 m limit of deviation and Bramford to Twinstead DCO includes a 4 m limit of deviation.</p> <p>It should also be noted that the only new overhead line towers in the Suffolk are those associated with the Friston substation. The maximum height for these is 54 m with a 6 m LOD, as set out in the Sea Link Draft DCO and assessed in the ES.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				<p>These overhead line towers have already been consented in the DCO for EA2; with the stated maximum height of 59.2m (see EA2 DCO Part 3: Requirements, Requirement 12); this is consistent albeit the Sea Link DCO has rounded up the number. Therefore, the same height as applicable with 6 m LOD has already been consented.</p> <p>Further, the total height consented, including 6 m LOD, is not particularly large. The largest overhead line towers in the Bramford to Twinstead project had a height of 62.23 m, with 4 m LOD permitted above this height, leading to a total consented height of 66.23. The maximum height was therefore greater than the maximum height being proposed for Sea Link.</p>	
3.14.7	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 19 (page 19)	The Consultee questions in relation to protective works if 14 days is considered a short period of time for this to be done, it is reasonable to assume a longer period of 28 days could be accommodated. Justification for the need for a period of 14 days instead should be provided.	The Applicant consider this timescale to be reasonable. The same timescale is present in the made DCOs for Yorkshire Green and Bramford to Twinstead.	Under discussion
3.14.8	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 27 (page 26)	The Consultee questions why it is a 14-day period as 28 days for maintenance is considered a more appropriate notification period.	The timescale in Article 27 for temporary use of land for carrying out the authorised project has been retained at 14 days as this is considered reasonable and is preceded in the Yorkshire Green and Bramford to Twinstead. It should be noted, however, that the timescale in Article 28 for use of land for maintaining the authorised project is 28 days which appears to address this comment.	Under discussion
3.14.9	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 50 (page 39)	In regard to felling and lopping, the Consultee has stated that clarification on the definition of 'near' is necessary. The Consultee considers it appropriate for a consent mechanism to be included here for felling trees outside the order limits.	<p>Whilst there is no precise definition of 'near' in the draft Order, the power in Article 51 (1) (felling or lopping) is limited and may only be exercised for the specific statutory purpose(s) set out, namely to prevent an obstruction or interference with the construction, maintenance or operation of the 'authorised development' (as defined) or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same. This is established wording with considerable precedent at Article 47 of the The Applicant (Bramford to Twinstead Reinforcement) Order 2024, Article 81 (1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 35 (1) of the Norfolk Boreas Offshore Wind Farm Order 2021, and Article 32 (1) of the Cleve Hill Solar Park Order 2022. None of these Orders included a definition of 'near'.</p> <p>The power does not differentiate between within or outside the Order limits and the application will include drawings indicating the areas which are likely to be impacted so no change is considered necessary to address the comment on felling outside the Order limits.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.10	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 51 (TPOs) - Part 6	<p>The Consultee does not have a completed Schedule 13 to review and questions if there are any trees under TPOs. The Consultee would welcome a list being provided by National Grid.</p> <p>The Consultee considers it appropriate for a consent mechanism to be included here for felling trees outside the order limits.</p>	The Applicant confirms that the full Schedule will be presented in the draft DCO submitted with the application.	Agreed
3.14.11	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 52 (page 42)	The Consultee raises the " <i>temporary closure of, and works in, the River Stour</i> " and questions if this should instead reference the River Fromus.	<p>The Proposed Project is located relatively close to two River Stours: one in Kent and one in Suffolk. The reference here is to the River Stour in Kent and is correct.</p> <p>However, the comment on adding the River Fromus to this Article has been noted by The Applicant with thanks. The wording has now been updated to also cover the River Fromus; now at Article 53.</p>	Agreed
3.14.12	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 55 - Safeguarding - Part 6	<p>Safeguarding:</p> <p>Regarding safeguarding, the Consultee considers this article should be omitted. If it is retained, the Consultee requests that the wording "<i>sent the notice to the undertaker by first class post</i>" is removed as notice is sent via email, and not by post. National Grid should also supply details of who the notice should be sent to. If this article is retained, in 54(5), the following words must be omitted: "<i>... and ensure that the matters raised in any such representation are addressed</i>".</p> <p>The Consultee does not consider this wording to be acceptable as drafted. The Consultee does not accept 2 working days as an appropriate period of time in 54(3)(b), as it is not reasonable or practicable.</p> <p>The Consultee requires clarification on what is meant by 'alteration' in 54(8)(a)(i) and what constitutes an alteration.</p> <p>The Consultee considers the appropriate mechanism is for the applicant to set up notifications for planning applications using the Council's Public Access planning service, freely available. The Consultee does not provide such a service for any other developer, which would require significant time and effort to do.</p>	The Applicant has confirmed that the Safeguarding article has been updated to align with the article included in the Bramford to Twinstead DCO.	Agreed
3.14.13	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Art 58 (page 44)	<p>Amendment of Local Legislation:</p> <p>The Consultee has requested clarification on the amendment of Local Legislation. Please provide copies of the local enactments which will be referred to in Schedule 17 (amendment of local legislation).</p>	This is noted by The Applicant and has stated that the workstream remains ongoing.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.14	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	The Consultee states that there is no reference to temporary or permanent pylons around the Friston substation in the Works described.	The Applicant state that this has been addressed with works described in Work No. 1A.	Agreed
3.14.15	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 2	The Suffolk Works Plans have not been shared with the Consultee, so the Consultee reserves the right to make further comments when these are shared. It is important to ensure all the appropriate elements (including landscaping, drainage, haul roads, SuDs, etc). are accounted for in each work number.	<p>The Applicant acknowledge that final application documents have not been shared with the Consultee to date and are happy to discuss the Works Plans when the Consultee have reviewed at a later date.</p> <p>The Proposed Project team further reflected on comments made by the Consultee and SCC on landscaping and drainage and in 2025 updated the description of works in the draft DCO submitted with the application to specifically reference works such as landscaping and drainage where applicable.</p> <p>It should also be noted that Schedule 1 (2) after Work 12 is a catch all inclusion of associated works that includes, for example, at e) '<i>landscaping and other works to mitigate any adverse effects...</i>', (d) <i>works to alter the course of, or otherwise interfere with a watercourse, drainage works, attenuation ponds, and temporary culverts; a) ramps, means of access...; l) And haulage roads.</i> Therefore, whilst this change has been made, the powers to generally implement landscaping within the Order limits are provided by this provision.</p>	Under discussion
3.14.16	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	<p>The Consultee has requested clarification on what is meant by 'battery storage' in (b) and clarification/justification for (c) – the increase in size of any onsite buildings.</p> <p>The Consultee notes that work No. 1 does not include any drainage or landscaping that the 'OR Work No. 1' following it does. If none is needed, this should be clarified.</p>	<p>Battery rooms are internal rooms inside the Substation building.</p> <p>The drafting of the DCO has evolved on this point, with the control of size of buildings controlled through Article 5: Limits of Deviation (LoD) in the draft Order.</p> <p>The point on landscaping and drainage has been addressed in Work No. 1. Appropriate landscaping/drainage works are now covered in the relevant work no. or in the Associated Development list</p>	Agreed
3.14.17	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	The Consultee notes work No. 2 seems not to include the electrical cables to be laid in the cable ducts.	The Applicant has stated that this has been addressed and is now covered in Work No.2 (n).	Agreed
3.14.18	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	The Consultee raises the question: are the lightning masts and lighting columns listed in (i) included in the 26 m height? Are they taller? Further details on these are needed.	A Table of Parameters has been included in Article 5 to clarify this point, stating that the maximum height of the Suffolk Converter Station would be ' <i>26 m above finished ground level (not including roof mounted equipment)</i> '.	Agreed

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			The Consultee has requested clarification on what is meant by (m) – fire deluge protection system. What does this constitute?	<p>Lightning protection is roof mounted equipment and for functionality reasons should generally be higher than the top of the building or structure it is mounted upon. It is therefore not included in the 26 m height. Conversely, lighting columns are not roof mounted and so would be subject to the 26 m maximum height.</p> <p>ES Chapter 4 includes a description of development and also clarifies what equipment would not be included in the maximum heights.</p> <p>A fire deluge protection system is a trickle fed water tank which is on site. This is also described in Chapter 4 of the ES (Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project).</p>	
3.14.19	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	The Consultee questions if (b) does include haul roads and should it include them?	The Applicant states paragraph 2 of Schedule 1 includes a catch all list of works that can be carried out within the Order limits, including haul roads, so this does not need to be explicitly listed in works on the Suffolk Converter Station.	Agreed
3.14.20	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 1	The Consultee questions what is meant by (d) – link pillar and requests clarification on the size and required number of is necessary. The difference between the link pillars in (d) and link boxes in (c) is required.	<p>A link pillar is a small cabinet, typically 1 m wide, 0.5 m deep and 1.3 m high, although the precise dimensions can vary. Article 5 in the draft DCO specifies that these are no more than 2 m above ground level to provide a maximum parameter. Total numbers of link pillars will not be known until detailed design is complete so cannot be specified in the application. Given the minor nature of this aspect of the development, the detail is not considered necessary for assessment of the impacts.</p> <p>Link boxes are buried chambers or boxes that sit within the link pillar.</p>	Agreed
3.14.21	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: General	The Consultee is content to be the discharging authority for all discharge of requirements. The DCO should be consistent in its terminology for the discharging authority for each requirement.	The Applicant states that not all requirements would be discharged by the Consultee because, for example, requirements related to highways would be discharged by Kent County Council (KCC) and SCC. Wording for requirements has been updated in the draft DCO to specify discharging authorities more clearly. The Applicant would be happy to discuss any further clarification required.	Under discussion
3.14.22	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: General	The Consultee notes there is no requirement in the DCO as drafted to secure Biodiversity Net Gain as a requirement. The Bramford to Twinstead includes Requirement 13 to secure written evidence of the ten per cent minimum BNG to be delivered to be submitted to the relevant planning authority for discharge. A similar provision is considered appropriate for the Sea Link DCO.	The Applicant is committed to playing its part in halting and reversing the decline of biodiversity in the UK and to achieving 10% BNG on major projects. The Applicant has made this commitment on a voluntary basis in advance of the requirement being mandatory for Nationally Significant Infrastructure Projects.	Under discussion

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				The initial approach taken to BNG on the Proposed Project is explored in the Biodiversity Net Gain Report submitted with the application. How this is delivered through a combination of on-site measures, off-site measures and credits will be determined when the detailed design of design is complete and the final effects and potential for delivering BNG on site is clear. The Applicant would welcome further discussions with local authorities on what it is appropriate to secure and through what mechanisms.	
3.14.23	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: General	<p>Ecology and Biodiversity:</p> <p>The Consultee notes that there is also no reference to how Biodiversity Net Gain delivery (including long term management and monitoring) is going to be secured. This will need to be captured somehow. In the absence of national guidance on securing BNG for NSIPs, this will need further discussion.</p>	The Applicant have provided a response to this in 2.2.2.22 above.	Under discussion
3.14.24	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Schedule 3: General	<p>Construction Management Plans:</p> <p>The Consultee has significant concerns about the intended one-stage approval process for the list of management plans given in Requirement 5. This is exacerbated by drafts of the full management plans not being available to review at the time of reviewing this draft DCO.</p> <p>At present, the DCO states that works will be carried out in accordance with the management plans listed in the requirement, which will be submitted in full in the DCO submission. This one-stage approval approach significantly limits the discharging authorities' post-consent controls over the construction period. Given the need for flexibility in the time between consent and appointment of contractors, finalising of methods and detail etc, this one-stage approval process is not considered appropriate at present.</p> <p>For the Consultee to be satisfied with a one-stage consent for the management plans, we would need to see the draft full management plans for review, comment, feedback, and discussion (with further review and comment likely to be required) ahead of DCO submission.</p> <p>A two-stage approvals approach, with submission of outline management plans at DCO submission, with full documents provided for discharge post-consent is preferred.</p> <p>The Consultee has concerns about a one-stage approvals procedure for the LEMP. Adequate and effective control and monitoring is particularly important in Suffolk and the region more widely, because of the emerging impacts of adverse</p>	<p>Requirement 6 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] has been recast to include the two-stage process as requested.</p> <p>The Applicant agree that it is important to have a period of monitoring and management of proposed planting to ensure that it is successful and provides the mitigation and/ or enhancements that are envisaged. The methods for this monitoring and maintenance will be provided in the final LEMP, which will be discharged by the relevant planning authority as set out in Requirement 6.</p> <p>The Applicant do not consider there is a need for a separate lighting plan to be discharged by the local planning authority.</p> <p>During construction lighting is controlled by measures set out in the CEMP (see lighting and visual intrusion section) and will be used where necessary for activities being undertaken. Specific measures are also included in the REAC (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3).</p> <p>including for example commitments that state that construction lighting will be designed as far as possible to reduce intrusion into adjacent properties, protected species and habitats.</p> <p>Lighting required during the operational period will be developed in accordance with The Applicant specifications,</p>	Under discussion

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			<p>growing conditions, in particular, in relation to periods of drought in spring following planting in the previous winter, as the Consultee has raised repeatedly in landscape thematic meetings. These challenging conditions have resulted in significant and widespread failures of planting on other schemes in Suffolk and the region. A management plan written now for DCO submission will have at least a year gap between appointment of contractors and detailed specifications. There must be appropriate provisions for aftercare and adaptive planting in changing and challenging conditions.</p> <p>The Consultee requests a two-stage approvals mechanism for the management plans to allow for proper post consent controls.</p> <p>Requirement 5 states ‘unless otherwise agreed with the relevant planning authority or other discharging authority as may be relevant’. The ‘other discharging authority as may be relevant’ needs clarification, setting out which authority is relevant for which submissions.</p> <p>This list of management plans does not include a lighting management plan, which is considered necessary for construction and operation.</p> <p>A Noise and Vibration Management Plan (NVMP) as referenced in (j) is considered necessary for the operational period too.</p>	<p>which aim to meet lighting requirements for safety and security purposes without creating unnecessary light pollution. The external lighting at Converter Stations and Substations is relatively minimal and no permanent lighting is required along cable routes or at overhead lines. Given that lighting specifications are set for safety purposes, there is limited flexibility in how this is developed so it is not considered appropriate that this be controlled by the local planning authority. Commitments are also included in the REAC on operational lighting, including for example a commitment for permanent operational lighting to be directed to the interior of the Converter Station, and on as low a column height as possible to avoid light spill onto Bloomfield’s Covert woodland and surrounding habitat (see Biodiversity section of the REAC).</p> <p>The NVMP has been prepared for the construction period only. However, the REAC includes a commitment on operational noise at NV07. In summary this commitment states that Saxmundham Converter Station and Friston Substation will include appropriate noise mitigation measures in the design and will be designed such that noise from their normal operation does not cause a significant adverse effect at nearby noise sensitive receptors.</p> <p>The design of the Saxmundham Converter Station will be completed in line with the relevant principles set out in the Design Principles document for Suffolk, with Requirement 3 providing the relevant planning authorities with approval that the final design complies with these principles. The final design will incorporate noise mitigation measures as required in the REAC.</p> <p>Friston substation is currently planned to be constructed under the EA1/EA2 consents so would be subject to requirements and commitments sent out in the relevant documents for those applications, including those on noise.</p> <p>Lessons from the delivery of major infrastructure projects show that better environmental outcomes, lower cost and more efficient construction results from securing outcomes (i.e. acceptable noise levels) rather than securing how an outcome will be achieved. The REAC Noise and Vibration (NV) section includes a commitment to securing noise levels that do not cause significant effects, which gives The Applicant the flexibility to incorporate methods to do this into the design as the design develops. It is not considered necessary or beneficial at this stage to set out in detail how this will be achieved, as this will depend partially on the</p>	

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				detailed design which will be completed post consent; nor is it considered necessary for the local planning authority to approve the solutions in a management plan beyond the existing commitments and requirements set out above.	
3.14.25	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	This list of definitions includes repetition of definitions previously included in the DCO and so including them here is repetition. Other definitions introduced here differ from those introduced previously – consistency is required.	The Applicant has noted this has states this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.26	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	<p>The Consultee notes that the list of pre-commencement activities here doesn't match the list given in Part 1 Preliminary – Interpretation. The Consultee questions why is a new definition introduced here, different to the previous one?</p> <p>The Consultee states that a definition on '<i>environmental mitigation measures</i>' is required.</p>	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.27	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes that 'Limits of deviation' uses the same definition as previously used – does it need repeating here?	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.28	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes that 'Migration planting scheme' is assumed to be mitigation planting scheme and so should be corrected.	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.29	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes 'Normal operation' requires defining as the relevant chapters in the ES have not been shared, and the definition is not included elsewhere in the DCO. The Consultee reserves the right to make further comments once this definition is shared.	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.30	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes the definition given for 'part' could benefit from redefinition.	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application.	Agreed
3.14.31	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes (f) – general site maintenance is considered to be too broad a definition and could include a range of activities that could provide a disturbance before the working hours. This definition needs revision and further discussion.	The definition of general site maintenance is considered reasonable and consistent with the approach taken in the Bramford to Twinstead and Yorkshire Green DCOs.	Under discussion
3.14.32	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 1 definitions	The Consultee notes that these paragraphs appear to be a duplication.	The Applicant have noted this, and this has been addressed in the draft DCO submitted with the application. The definitions are no longer repeated	Agreed

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3.14.33	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 2	Time Limits (B) one year if shorter – The Consultee questions why this provision is necessary. The Consultee understands the terms of the Proposed Project’s license agreement necessitate operation far earlier than this provision would allow. The Consultee has requested that justification for this should be required.	The wording of this Requirement evolved, with this evolution presented in the revised of Requirements version sent to the Consultee in December 2024.	Under discussion
3.14.34	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 3	The DCO should include detailed parameters, as has been done in the East Anglia One North and East Anglia Two DCOs. These parameters should include elements including height, size, and levels for discharge. There should be distinct parameters for buildings, electrical equipment, and elements like lightning masts. This should also include the maximum footprints for the substation and converter station. For reference see Requirement 12 – Detailed Design Parameters Onshore of the East Anglia One North and East Anglia Two DCOs. The Proposed Project DCO needs to reflect and replicate the controls and management secured under those DCOs for the Friston substation.	The Applicant notes that a table of parameters for key aspects of the development is included in Article 5 Limits of Deviation. These comments are being considered further.	Under discussion
3.14.35	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 3	<p>Converter Station Design:</p> <p>The Consultee is concerned about the one-stage approval process for the design of the converter station and does not consider it acceptable.</p> <p>A two-stage approval mechanism is considered necessary to allow appropriate post consent controls. In other DCOs, requirements have secured design principles followed up a requirement to submit a statement of compliance post-consent to demonstrate how the design principles have been incorporated – notably relevant to the accommodation campus in the Sizewell C DCO, and relevant to the Friston substation under the ScottishPower Renewables East Anglia One North and East Anglia Two DCOs.</p> <p>Such a mechanism would also allow for further masterplan discussions post-consent, when more certainty is possible over the NGV projects at the converter station site.</p>	The wording of the Converter Station Design Requirement (Requirement 3) has been altered to present a position where the LPAs will be provided with details of the layout, scale and external appearance to confirm these conform to the Key Design Principles. The Key Design Principles were provided to LPAs for comments, and comments taken into account in the finalisation of the document to submit with the DCO Application.	Under discussion
3.14.36	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 4	The Consultee states there should be a time limit for the provision of the written scheme to the relevant planning authority. Part (3) of requirement 4 states notification of each stage of commencement and completion should be provided within 20 business days of the event occurring. A similar timescale should be included for part (1) of Requirement 4.	The Applicant have accepted this comment. A minimum period of 7 days has been incorporated into Requirement 4. The timescale of 7 days is the same as is included in the Bramford to Twinstead DCO.	Agreed

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3.14.37	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	The Consultee notes it is understood that the management plans secured by Requirement 5 of the draft DCO will bite on the pre-commencement operations, given there is no reference to commencement in the wording in Requirement 5. This should be clarified. If not, the mechanism for securing appropriate management plans for the pre-commencement works should be specified.	This has been accepted by The Applicant. Text has been added to the requirements to make it clear that pre-commencement operations must be carried out in line with the final management plans in requirements 5 and the outline management plans in requirement 6.	Agreed
3.14.38	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]	Schedule 3: Req 5 and 6 management plans	The current list of Requirements appears not to include any management plans for the operational life of the development. Operational management plans are necessary to cover elements including but not limited to; public rights of way, noise and vibration, operational drainage, and lighting.	<p>The Outline Public Right of Way Management Plan (Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk) covers both the construction and operational phases, as will the final plan secured by Requirement 6.</p> <p>As explored in the response to comment 163 above, The Applicant disagree that there is a need for a noise management plan for the operational period because noise levels are controlled by a commitment in the REAC to ensure not significant adverse effects at sensitive receptors and include further commitments to look at ways to further reduce noise levels.</p> <p>The Drainage Management Plan secured under Requirement 6 will not cover the operational period. However, commitments on drainage measures for both the construction and operational period are included in the REAC. It is therefore not considered to be necessary to have an additional requirement or plan for the operational period on drainage.</p> <p>As set out in the response to comment 163, there are measures to control lighting in the REAC, so a separate lighting management plan is not necessary for the construction or the operational period.</p>	Agreed
3.14.39	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	The Consultee notes that Requirement 5 does not include a lighting management plan for the construction period, which is considered necessary.	The Applicant have provided a response to this in 2.2.2.38 above.	Agreed
3.14.40	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Schedule 3: Req 5 and 6 management plans	The Consultee notes a NVMP as referenced in (j) is considered necessary for the operational period too.	The REAC secures the principle that noise levels at properties do not result in significant adverse effects; and includes measures to go further where possible. Therefore, a separate plan on this is not necessary.	Agreed

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3.14.41	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	A landfall method statement for work No 6. may be considered necessary. Further discussion is necessary, and the Consultee reserves the right to make further comments on its inclusion. Sea Link is proposing to make landfall at a location subject to significant coastal processes. This matter requires further engagement with the Consultee and the coastal management team therein, and the Consultee reserves the right to make further comments after these discussions. This may also require a monitoring plan, also subject to the same comment about further discussion needed. There is a similar provision in Requirement 13 of the East Anglia One North and East Anglia Two DCOs.	Detail of the landfall marine cable works is provided in the Project Description presented in Chapter 4 of the Environmental Statement. Matters to manage the installation have been covered by the Outline Offshore Construction Environmental Management Plan, with a final version to be prepared for approval of the relevant planning authority pursuant to Requirement 6. The Consultee will therefore have input into this plan.	Under discussion
3.14.42	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	The Consultee notes that it may be necessary for the Proposed Project's DCO to make provision for decommissioning of landfall and subsequent monitoring. Similar provision is made in the East Anglia One North and East Anglia Two DCOs. Requirement 37 of those DCOs requires 25 years of monitoring following decommissioning of relevant landfall works. Further discussion with ESC and the coastal management team is required.	Requirement 13 of Application Document 3.1 draft Development Consent Order requires that six months prior to the authorised development being decommissioned, a written scheme of decommissioning must be submitted for approval by the relevant planning authority. This written scheme would cover decommissioning of landfall works and set out any future monitoring requirements, should this be considered necessary. Given the uncertainties associated with the decommissioning process, timescales and habitats present at that time, the Applicant considers it premature to set a period for monitoring after decommissioning at this stage.	Agreed
3.14.43	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]	Schedule 3: Req 5 and 6 management plans	There is no requirement relevant to fencing and other means of enclosure, the Consultee considers it appropriate for one to be included. For reference see Requirement 17 of the ScottishPower Renewables East Anglia One North and East Anglia Two DCOs.	Requirement 17 of the EA1/2 consents require that all details of permanent and temporary fences are submitted and approved by the LPA. Information on fencing and enclosures during construction for the Sea Link project is instead provided in the Outline Onshore CEMP, which will be updated and approved by the relevant planning authorities pursuant to Requirement 6. The design and specification of permanent fences, gates, CCTV, lighting, clearances and related items shall meet The Applicant technical and security requirements as determined necessary for the facility and location. Indicative guidance on design principles is provided in the Design Principles – Suffolk application document and will also be guided by relevant commitments in the REAC. It is not considered necessary to also include a separate requirement on fencing. It should be noted that Friston substation is highly likely to be delivered under the EA 1 and EA2 consents rather than the Sea Link consent.	Agreed
3.14.44	Application Document 7.5.3 (B) Outline Onshore Construction	Schedule 3: Req 5 and 6 management plans	Requirement 44 of the East Anglia One North and East Anglia Two DCOs is – Control of Development During Operational Phase, relevant to operational drainage and landscaping. A similar provision should be made in the Sea	Commitments on drainage measures for both the construction and operational period are included in the REAC. The LEMP also covers both the construction period and management of landscaping during the operational	Agreed

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	<p>Environmental Management Plan [AS-127]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>		Link DCO, to reflect the controls already secured in those DCOs.	period. Both the final CEMP and the final LEMP are required to be submitted to the relevant planning authority for approval under Requirement 6. It is therefore not considered necessary to have an additional requirement for the operational period on drainage or landscaping.	
3.14.45	<p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p> <p>Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	Schedule 3: Req 5 and 6 management plans	There is no requirement for emergency planning arrangements (other DCOs have secured this – Requirement 6 of the Sizewell C DCO, Requirement 33 of the East Anglia One North and East Anglia Two DCOs).	<p>Planning for emergencies and health and safety is core to all The Applicant activities and processes. The Applicant will prepare an Incident Response Plan to manage emergency planning arrangements. The commitment to prepare this document is presented in GG24 in the REAC, which in turn is part of the CEMP secured by Requirement 6.</p> <p>The Applicant will inform the Consultee of what are considered large scale incidents under the Incident Response Plan. Smaller scale issues will be recorded in a register that will be made available to Host Authorities for review on request.</p> <p>The Applicant is aware that the Proposed Project is within the Extended Emergency Planning Zone (as identified in the Suffolk Radiation Emergency Plan) and the Incident Response Plan will include plans in respect of a major incident at Sizewell B.</p>	Agreed
3.14.46	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	There is no requirement controlling operational noise. Requirement 27 of the East Anglia One North and East Anglia Two DCOs secures this, and these limits and controls should be replicated by the Proposed Project's DCO for the Friston substation. The Consultee states that similar controls should be included for the converter station site through additional requirement.	<p>Whilst there are elements of the Proposed Project's DCO and the EA1 and EA2 DCOs that replicate each other at Friston substation; the majority of works under both projects are not in this area of overlap. The Sea Link works at Friston are also only a subsection of the works consented under the EA1 and EA2 projects at this location. Therefore, whilst the parameters of what is proposed for the area of overlap are consistent, it is not appropriate or necessary for every requirement and management plan included in the EA1 and EA2 DCOs to be also applied to Sea Link in the same manner.</p> <p>Noise levels at sensitive receptors are controlled by commitment NV07 in the REAC for Sea Link.</p>	Agreed

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				It is emphasised that the Friston substation is highly likely to be constructed under the EA1/ EA2 consents. The provision in the draft DCO (Application Document 3.1 (E) draft Development Consent Order [CR1-027]) for The Applicant to undertake these works is necessary in case they are not developed by the SPR, but it is not considered likely that Friston substation would be developed by The Applicant.	
3.14.47	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	<p>Ecology and Biodiversity:</p> <p>The Consultee states that the current draft of the DCO makes no reference to any terrestrial ecology related requirements. However, the Consultee notes that until they have viewed the ES, it is difficult to confirm what Requirements they think are required or what the scope should be. The Consultee's comment in relation to ecology and biodiversity are therefore limited by this.</p>	This has been noted by The Applicant.	Agreed
3.14.48	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Req 5 and 6 management plans	<p>Environmental Protection:</p> <p>The Consultee acknowledges that although it is accepted these are draft documents, it is likely that further requirements will need to be included for the order to be effective, examples of this include (but are not limited to) operational noise limits set as rating levels for nearby noise sensitive receptors and the control of artificial light onshore. National Grid is advised to refer to the comparable consented projects EA1N and 2 as examples of expectations.</p>	The Applicant have addressed this in responses above.	Agreed
3.14.49	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan – Suffolk [AS-132]	Schedule 3: Req 7	<p>Construction Hours</p> <p>This draft requirement is not accepted at this time. Saturday afternoons, Sundays and Bank holidays have been included in the core working hours, and this is not accepted.</p> <p>Detailed comments on the proposed working hours are included in the Consultee's response to the additional consultation and so are not repeated here.</p> <p>Furthermore, the items listed in subsection (4) are too wide in scope and effectively allow the applicant to continue working outside core hours in most situations, with the exception of emergency works where risk to life or property exist and a few other exceptions, such as security operations, that may be discussed with the applicant in due course, works must be restricted to the core hours unless approved by the LPA.</p> <p>Following this the applicant has included 1 hour start up and</p>	<p>Discussions are ongoing between The Applicant and the LPAs on this topic, with a meeting held on construction hours between The Applicant, the Consultee and SCC on 29 January 2025.</p> <p>Actions were taken from this meeting for The Applicant to:</p> <ol style="list-style-type: none"> 1- Share the draft Construction Noise and Vibration Management Plan with Local Authorities to aid understanding of the how construction noise would be managed to minimise effects within the proposed construction hours. Shared 5 February 2025 alongside the draft Construction Traffic Management Plan. 2- ESC/SCC requested that the wording of this requirement be amended to make it clear that HGV movements should not happen on bank holidays unless agreed with Local Health Authorities (LHAs). This has been accepted and incorporated in the draft DCO for submission with the application. 3- Consider how the ES and management plans deal with cumulative impacts, noise and construction hours 	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
			<p>close down either side of core hours, this does not appear to have been factored into assessments or mitigation and is not accepted, it is effectively extending core hours by 2 hours a day and with the current inclusion of Saturday afternoons, Sundays and Bank Holidays is unacceptable.</p> <p>Any work undertaken outside core hours without approval should be zero impact in terms of noise and vibration, dust, light and other environmental impacts.</p> <p>The Consultee advises National Grid to consider Requirements 23 and 24 of the EA1N and 2 Development Consent Orders, as comparable consented local projects as examples of this requirement that have been discussed, accepted, and tested through examination.</p> <p>The Bramford to Twinstead DCO contained a list of properties that had been identified as excluded from the working hours. This needs further discussion.</p>	<p>and update as appropriate for documents in the application.</p> <p>The issues raised here were also discussed and remain under discussion between the parties. The Applicant have noted to date that:</p> <ul style="list-style-type: none"> The urgency of the project means that construction hours should not be restricted without good justification. There are locations where longer hours would not result in greater impacts and may deliver benefits due to reducing the overall project programme (and therefore the period over which communities would be affected by construction of the project); and meaning traffic may be routed during off-peak periods. The inclusion of the start-up and close down periods of 1 hour beyond core hours is consistent with the approach taken on other projects such as Bramford to Twinstead. The Applicant disagrees that the test for whether impacts are acceptable or not is whether there is <i>zero</i> impact in terms of noise, vibration, dust or light. However, The Applicant is open to discussions on whether core hours would need to be restricted in locations where significant adverse effects would result from the hours proposed, and these effects could be removed through the change in hours. <p>The Applicant is aware that the LPAs are not currently satisfied with the approach and is keen to work to resolve issues as far as possible.</p>	
3.14.50	Application Document 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan – Suffolk [AS-132]	Schedule 3: Former Requirements 8, 9 and 10: Planting Scheme (now removed)	<p>Mitigation Planting Scheme:</p> <p>This requirement does not refer to any tree protection measures and should.</p> <p>Part (3) of Requirement 8 relates to indicative landscape mitigation plans. These have not been shared with the Consultee for review, and so the Consultee reserves the right to make further comments once these documents have been shared.</p>	<p>Retention and protection of existing trees and hedgerows is covered by requirement 8.</p> <p>As discussed above, with the introduction of a two-stage process for development of management plans the requirement for a Mitigation Planting Scheme has now been removed. This detail will now be provided in the LEMP.</p>	Agreed
3.14.51	Application Document 7.5.7.1 (B) Outline Landscape and Ecological	Schedule 3: Former Requirement 10 and maintenance of mitigation planting (now removed)	A period of 5 years as stated is not considered acceptable for the converter station and substation sites – this should be increased to 10 years. This should include reference to adaptive management measures.	This requirement has now been removed as maintenance of planting will be covered in the LEMP.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
	Management Plan – Suffolk [CR1-045]		As a general note on landscaping – the Design Freeze 4/DF4 Order Limits changes were amended to reflect the mitigation agreed under the SPR East Anglia One North and East Anglia Two DCOs – the Proposed Project’s DCO needs to fully replicate the controls and management measures secured in those DCOs.	The Applicant is considering the extent to which it is necessary/appropriate to replicate controls in the SPR DCOs in the Sea Link DCO.	
3.14.52	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Former Requirement 9 (formerly 12)	<p>The Consultee states that the wording of reinstatement requirements often refers to reinstating the land to its previous condition, rather than ‘a condition suitable for its former use’. Why is this flexibility needed? Justification/clarification is required.</p> <p>Part (2) excludes the requirement to reinstate the land within [x] metres of underground cables. What will this distance be? This appears to mean there is no requirement to reinstate land around the cable route. Further discussion/clarification is needed.</p> <p>The Consultee considers it necessary for this requirement to include wording to allow the applicant/undertaker not to reinstate the land as stated, to provide a degree of flexibility if a landowner wishes to retain elements instead of having the land reinstated.</p>	<p>Requirement 9 (2) (formerly 12(2)) states that the requirement to reinstate the land to a condition suitable for its former use does not apply to land above or within 10 metres of underground cables installed as part of the authorised development. This is because it is not possible to plant trees or do certain activities above the cable so it cannot necessarily be reinstated as previous in these areas. The area around the cable is only used temporarily during construction, but the planting restriction is permanent and affects how land is reinstated. The land would still be reinstated in this area.</p> <p>The draft DCO already incorporates flexibility for The Applicant to change how land is reinstated at the request of the landowner. This is provided in Article 27 (Temporary use of land for carrying out the authorised project), which contains the caveat “unless otherwise agreed with the owners of the land” in the wording requiring the undertaker to remove all temporary works and restore the land (subject to the list of activities it is not required to do). If a landowner wished to retain elements, the wording is sufficiently flexible to enable this to be agreed.</p>	Under discussion
3.14.53	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Requirement 12 (formerly 15)	This requirement identifies the Consultee as the discharging authority, reference to consultation with Suffolk County Council as Highways Authority should be added. The Consultee is content to be the discharging authority.	This requirement has been amended so that it is now discharged by SCC, as requested by SCC.	Agreed
3.14.54	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3: Requirement 13	<p>The Consultee requests clarification/justification for ‘excluding for substations’ – what exactly is meant by substations here and why are they excluded? How will decommissioning be done for them?</p> <p>This requirement should have a ‘bite’ at cessation of operation which it currently does not.</p> <p>Wording should be introduced here to require notification be made to the local planning authority of cessation of operation, within 6 (or otherwise agreed) months of cessation occurring.</p>	The Applicant will consider the wording of this requirement further.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.55	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4, para 1(1)	<p>The Consultee has never previously accepted a 28-day timescale for determining discharge of requirements. The Consultee would expect to see a longer timescale of 56 days instead, with provision made for 'unless otherwise agreed' with the LPA.</p> <p>To highlight, the Consultee is the host authority for multiple DCOs and is involved in several out of district projects too. The Consultee is currently discharging requirements (or advising on) for Sizewell C, East Anglia One North, East Anglia Two, and East Anglia Three. This is in addition to a significant workload on NSIPs in the pre-application stage.</p> <p>At the time the Proposed Project is anticipated to be discharging requirements, it is highly likely the Consultee will be the host and discharging authority for multiple more projects. A period of 28 days is simply not long enough to allow proper decision making, particularly in this context.</p> <p>It is essential that officers have enough time to properly carry out their duties. 56 days is considered the appropriate amount of time.</p> <p>It is understood from the Explanatory Memorandum that the desire for 28 days is for expediency of the construction programme. This justification is not accepted. Timely submissions from the application is a more appropriate solution to concerns about meeting programme timescales. The applicant can decide when to undertake the work preparing discharge of requirement submissions, and if it knows the period of time available to discharging authorities is 56 days, it can plan consent and construction programmes accordingly.</p> <p>The Consultee does not consider deemed consent appropriate.</p> <p>The Consultee suggests to National Grid that Section (3) should be removed.</p>	<p>Schedule 4 has been updated to elongate the timescale over which further information can be requested from 2 to 7 days; and the timescale for discharge from 28 to 35 days. This reflects timescales in the made Bramford to Twinstead DCO. This is considered a reasonable compromise for the formal discharge process.</p> <p>However, the pressures on the Consultee as a host authority are understood and The Applicant is committed to working with the Consultee to manage this. The Applicant is happy to work with the Consultee to provide a programme setting out when applications to discharge requirements will be submitted to assist in resource planning. The Applicant is happy to discuss a further PPA to contribute towards costs associated with the discharge of requirements.</p> <p>The final management plans will be based on the outline versions, which are submitted with the DCO application, and we would anticipate continuing to meet the Consultee regularly and share information as far as possible prior to submission. Where possible and helpful, this can include sharing draft documents so that when documents are submitted for discharge the content has been discussed previously. The Applicant is keen to work with the Consultee outside the DCO process to support.</p> <p>Deemed consent is a standard provision and was included in the made Bramford to Twinstead DCO (see Schedule 4, (1)). This provision is considered necessary because it cannot be, for example, that a major, urgent national infrastructure project is prevented from progressing by resource issues at LPAs. This is particularly necessary for a programme critical project such as Proposed Project.</p>	Under discussion
3.14.56	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4, para 1(2)	<p>The Consultee does not consider it appropriate given the short timescale of 28 days for determination, for automatic consent to be deemed given on day 29. The comments above are applicable here.</p>	<p>This timescale is now 35 days, but the point is understood. Deemed consent is a standard provision and was included in the made Bramford to Twinstead DCO (see Schedule 4, (1)). This provision is considered necessary because it cannot be, for example, that a major, urgent national infrastructure project is prevented from progressing by resource issues at LPAs. This is particularly necessary for a programme critical project such as the Proposed Project.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.57	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4 (para (2))	<p>The Consultee notes the timescales given here ‘2 business days’ is impracticable and not feasible.</p> <p>Part (5) should be deleted. The Consultee does not consider it acceptable that where further information is requested in relation to part only of an application that it should be treated as separate from the remainder of the application. This is not practicable or feasible for the Consultee.</p>	<p>The first part of this comment is accepted. The timescale for additional information to be requested in Schedule 4 has been elongated from 2 to 7 days.</p> <p>The drafting of Part (5) replicates the wording in the Bramford to Twinstead DCO and is considered reasonable.</p>	Under discussion
3.14.58	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4	<p>Provision should be made for the discharging authority to consult SCC/ESC as appropriate – where the Consultee is discharging body, there should be a requirement to consult SCC, when SCC is not named in a specific requirement. This should apply in the reverse when SCC is the discharging body.</p> <p>In the case of requirements in respect of which East Suffolk Council is the discharging authority under Schedule 3 of this Order, East Suffolk Council must consult with Suffolk County Council. In the case of requirements in respect of which Suffolk County Council is the discharging authority under Schedule 3 of this Order, Suffolk County Council must consult with East Suffolk Council.</p>	<p>The requirements have been significantly updated since this comment was made. The Applicant would welcome comments from ESC on the revised draft requirements issued in December 2024 and whether any further changes are required to clarify discharge bodies.</p>	Under discussion
3.14.59	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4	<p>The Consultee states that further discussion on the fee for discharge of requirements is necessary. One option is to have a charging schedule to set out clear fees for each discharge of requirement.</p> <p>Part (2) is not accepted by the Consultee. It is not appropriate for a refund to be provided under (a) or (b).</p>	<p>The fee proposed of £145 aligns to the fee levied for the discharge of a planning condition on a Town and Country Planning Act application for ‘other developments’ as correct in February 2025 (<u>Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023</u>). This fee applies to conditions for major applications, with material similar to that to be submitted to discharge requirements. The same principle and amount was included in the Bramford to Twinstead DCO.</p> <p>However, The Applicant is happy to discuss a further PPA to contribute further towards costs and ensure the LPA is able to respond on programme.</p> <p>The point on a refund is accepted, this provision has been removed from Schedule 4 of the draft DCO.</p>	Under discussion
3.14.60	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 4 (para 4(2)(e))	<p>The Consultee considers 10 working days too short a period and suggests 20 working days would be more appropriate.</p>	<p>This timescale is considered to be appropriate by The Applicant. Given that if the appeals process has started there will have already likely been delays to the Proposed Project as a result of the requirements discharge process, it is imperative that appeals are settled efficiently, and this timescale is considered to be reasonable in this context.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.14.61	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Schedule 3 Requirements: General	The Consultee notes that it is understood that the management plans secured by Requirement 5 of the draft DCO will bite on the pre-commencement operations, given there is no reference to commencement in the wording in Requirement 5. This should be clarified. If not, the mechanism for securing appropriate management plans for the pre-commencement works should be specified.	The Applicant are querying with ESC regarding whether all management plans apply to pre-commencement operations expressly.	Under discussion

Table 3.15 Agriculture and Soils

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.15.1	N/A	Data from other projects	The Consultee requested that data from other projects is sought to reduce impacts on landowners associated with surveys and that data from the Proposed Project is also shared.	The predictive mapping has drawn on publicly available data and has used soil survey data from previous surveys available from the National Soil Resources Institute (NSRI). The Applicant will share survey data with other projects and landowners. The data obtained for the Proposed Project is either publicly available or has been purchased from NSRI. This data has been set out in the Agricultural Land Classification (ALC) report and will be publicly available once the DCO application has been submitted.	Agreed
3.15.2	Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019]	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application. ESC will review and comment as required in due course.	The Applicant will provide the Consultees with the final agriculture and soils assessment methodology set out in Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019] following submission of the DCO Application. As such, this matter is still under discussion.	Under discussion
3.15.3	Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019] Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]	Mitigation presented in the ES and Outline Soil Management Plan	The Consultee will review the proposed mitigation following the submission of the DCO application. ESC will review and comment as required in due course.	The Applicant will provide the Consultees with the proposed mitigation for agriculture and soils effects set out in Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019] and Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] following submission of the DCO Application. As such, this matter remains under discussion.	Under discussion
3.15.4	Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019]	Assessment conclusions presented in the ES	The Consultee will review the assessment conclusions following the submission of the DCO application. ESC will review and comment as required in due course.	The Applicant will provide the Consultees with the agriculture and soils assessment set out in Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture & Soils [PDA-019] . As such, this matter remains under discussion.	Under discussion

Table 3.16 Landscape and Visual

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.16.1	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment - Suffolk	Landscape and Seascape Character baseline	<p>The Consultee raised no concerns on the baseline of the landscape assessment as set out in the PEIR and acknowledged that the ES will provide further information.</p> <p>The Consultee agreed the baseline landscape receptors as set out in the PEIR in an email sent on 7 June 2024.</p>	The Landscape Character Areas (LCAs) and Seascape Character Areas (SCAs) were set out in the baseline section of the PEIR. The Statutory Consultation responses required further detail of the key characteristics of the LCAs which is included within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097] .	Agreed
3.16.2	N/A	Visual Amenity baseline – Representative Viewpoints	<p>Within the 22 April 2024 meeting, it was set out that viewpoint locations have been updated following stakeholder requests and include two new viewpoints at Friston to ensure a robust approach as set out by National Grid.</p> <p>Representative viewpoints agreed via email on 23 January 2025</p>	<p>The representative viewpoints were set out in the baseline section of the PEIR. Following the production of the PEIR, five additional representative viewpoints were added following Statutory Consultation comments, additional site work and design development.</p> <p>Following the meeting on 10 September 2024 The Applicant agreed to the inclusion of five of the additional 10 viewpoints requested by SCC on 18 June 2024. The exclusion of the other five requested additional viewpoints was not agreed by SCC.</p>	Agreed
3.16.3	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	PEIR Assessment of effects	The Consultee acknowledged and agreed the approach to the PEIR assessment of effects within 27 February 2024 meeting.	<p>The assessment of effects on landscape character (including the AONB) and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment.</p> <p>The assessment of effects on landscape character and visual amenity is presented within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] in line with the methodology and professional judgement.</p>	Agreed
3.16.4	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048].	Study Area	Following discussions and correspondence the Consultee agreed the study area in email sent on 7 June 2024.	The Study Area was set out within the PEIR and is the same for the ES Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] . The study area comprises an area of 3 km from the Order Limits surrounding the proposed Saxmundham Converter Station and Friston Substation and 1 km from the Order Limits around the	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				proposed landfall and HVDC and HVAC cable corridors.	
3.16.5	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048].	Mitigation - Planting heights for mitigation planting within year 15 photomontages	Following discussions and correspondence which included sharing relevant information regarding planting heights the Consultee agreed, in correspondence dated 13 August 2024, to the planting heights provided by National Grid on 2 August 2024 as a basis for presenting the visualisations.	The planting heights for year 15 visualisations have been discussed with the Consultees and agreed with ESC.	Agreed
3.16.6	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	LVIA methodology	The Consultee agreed to the approach to the LVIA methodology set out in the PEIR in an email sent on 7 June 2024.	<p>The LVIA methodology was set out within the PEIR and is presented in the ES in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048], with minor updates following the publication of the GLVIA3 Notes and Clarifications Technical Guidance Note by the Landscape Institute since the PEIR was prepared. The LVIA methodology was circulated again after the 27 February 2024 meeting. The 27 February 2024 thematic meeting discussed several points raised by the Consultees at Statutory Consultation regarding the LVIA methodology and concluded that more detail will be provided within the ES.</p> <p>The LVIA methodology presented in the ES is considered to be appropriate with guidance and typical approaches and referred to descriptive text in accompanying appendices. The Applicant is reviewing the comments provided by SCC on 20 January 2025.</p>	Agreed
3.16.7	Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]	Photomontage methodology	The Consultee agreed the methodology in email sent on 7 June 2024.	The Photomontage methodology was updated following the PEIR and used for photomontages which have been prepared for the ES (Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]). This methodology has been agreed by the Parties.	Agreed
3.16.8	Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029] Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048] Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Design principles and landscape strategy	<p>The Consultee has been involved in the development of design principles and the landscape strategy. This has been covered in thematic meetings, including the 27 February 2024, 22 April 2024 meetings and 8 January 2025 meetings.</p> <p>The Consultee has reviewed and is satisfied with the design principles and landscape strategy set out in the design documents, landscape and visual ES chapter and Outline LEMP.</p>	Design principles and landscape strategy, including reference to ‘good design’, have been in development for both the Proposed Project and an illustrative masterplan for co-location in parallel as set out in Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029] and Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] .	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				The Applicant submitted the design documents and landscape and visual ES chapter and Outline LEMP with the submission of the DCO Application.	
3.16.9	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Outline Landscape and Ecology Management Plan	<p>The Consultee is aware of the progress being made on the oLEMP, and updates have been covered in thematic meetings.</p> <p>The Consultee agreed to have separate oLEMPs for Suffolk and Kent. The Consultee issued further explanation of their thoughts on the oLEMP structure on 13 August 2024 requesting further information from National Grid on the content of the oLEMP, specifically around what an adaptive landscape management approach looks like, which is referred to within the oLEMP Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]. The draft structure was agreed to via email on 23 January 2025.</p>	<p>The Applicant issued draft headings for the oLEMP and the fact that it proposed to provide separate oLEMPs for Suffolk and Kent which are included in the DCO Application.</p> <p>Given the timing of the comments from SCC, such comments are to be addressed post submission of the DCO Application.</p>	Agreed
3.16.10		Sequential Cumulative Effects	The Consultee agreed to the approach for assessing sequential visual effects in relation to cumulative effects via email sent on 7 June 2024.	It was discussed in the 27 February 2024 meeting that the ES chapter will assess sequential visual effects in relation to cumulative effects, as requested by stakeholders at Statutory Consultation. This will be proportionate based on the information available at the time of writing. A list of key routes in the area was put forward to the Consultees for comment. It was also explained that landscape cumulative assessment covers indirect and direct effects on perceptual qualities, so it is considered that landscape sequential effects have been covered.	Agreed
3.16.11	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048] Application Document 9.84 Code of Construction Practice submitted at Deadline 3	Scope out Year 15 effects for cable routes and landfall	The Consultee agreed the approach to Year 15 effects for cable route and landfall in an email sent on 7 June 2024 (based on assumption that all landscape restoration works have been wholly successful).	<p>It was queried in the 27 February 2024 meeting as to why the Consultees felt that year 15 effects on cable routes and the landfall are required as significant effects are not expected at year 1 and full reinstatement will occur after construction with reasoning given in the circulated meeting minutes. The Consultees requested that year 15 effects are still reported on, which The Applicant agreed to and is included in the ES (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048])</p> <p>The Applicant agreed to include this reinstatement commitment in the ES at the request of the Consultees. Land used temporarily will be reinstated where practicable to its pre-construction condition and use, unless agreed otherwise. This is set out primarily within the Code of Construction Practice</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				(CoCP) Application Document 9.84 Code of Construction Practice submitted at Deadline 3.	
3.16.12	N/A	Visual Amenity baseline – Representative vs Illustrative Viewpoints	Approach agreed in the 27 February 2024 meeting.	The 27 February 2024 meeting discussed whether illustrative viewpoints would be considered. It was set out that representative viewpoints are felt to be appropriate with reasoning given in the circulated meeting minutes.	Agreed
3.16.13	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Visualisation from diverted PRow	The Consultee requested at Statutory Consultation for a visualisation from diverted PRow. This was discussed at the meeting held on 25 June 2024 including challenges around taking summer photography due to access into cropped, working land and that the diverted PRow information was not available during winter photography. Cross-sections or an artist impression for illustrative purposes were discussed. National Grid landscape explained that an illustrative cross-section of diverted PRow would be provided within the ES. The Consultee has reviewed this and is satisfied.	The 27 February 2024 meeting discussed a request at Statutory Consultation for a visualisation from diverted PRow and challenges around this with reasoning given in the circulated meeting minutes. The Applicant has prepared an illustrative cross-section of diverted PRow, which is shown in Figure 2 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] and will share this with the Consultees for agreement following the DCO Application submission.	Agreed
3.16.14	N/A	Photomontage presentation	The Consultee agreed to the photomontage presentation approach in email sent on 7 June 2024.	Following a request in the 27 February 2024 meeting, the presentation template for photomontages was issued by The Applicant following the meeting for comment.	Agreed
3.16.15	N/A	Separate assessment of the Heritage Coast	The Consultee agreed to the approach to having a separate assessment of the Heritage Coast in email sent on 7 June 2024.	The 27 February 2024 meeting discussed the approach that the Heritage Coast should be assessed separately to the AONB with reasoning given in the circulated meeting minutes.	Agreed
3.16.16	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape compensation	The Consultee expects to seek compensation for any residual adverse landscape and visual effects that result from the Proposed Project as part of the mitigation hierarchy. The mitigation hierarchy is defined on page 173 of NPS EN-1 as “A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.”. ESC disagrees with the Applicant’s interpretation of NPS EN-1 and considers that compensation for adverse landscape and visual effects impacts is still required, in line with the mitigation hierarchy.	It is The Applicant’s position that NPS EN-1 does not support the Consultees’ position. The definition of Critical National Priority on page 171 itself acknowledges that there will be in some cases residual effects that are not capable of being addressed by the mitigation hierarchy and implies that the application of the mitigation hierarchy is intended to address the effects of the scheme. Landscape enhancements that are remote from the site and therefore do not address those residual impacts on the landscape that is affected by the scheme would not be addressing the impact of the Proposed Project. Therefore, it is The Applicant’s view that landscape ‘compensation’ that addresses the effects of the scheme is not possible. This is different to the accepted approach taken on biodiversity impacts, which can be compensated for.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				<p>This interpretation is supported by NPS EN-1. Paragraph 5.10.5 acknowledges that “virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape” and paragraph 5.10.6 states that “Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints [avoid] the aim should be to minimise harm to the landscape [reduce], providing reasonable mitigation where possible and appropriate [mitigate]” (square brackets and emphasis added). Any direct or indirect reference to compensation is conspicuous by its absence from paragraph 5.10.6 or any paragraphs of NPS EN-1, EN-3 or EN-5 that relate to landscape and visual impacts. This is in contrast to the Biodiversity and Geological Conservation section of NPS EN-1 (Section 5.4), which includes numerous references to compensation being required as part of the mitigation hierarchy for biodiversity impacts, including at paragraphs 5.4.35, 5.4.42, 5.4.43, and 5.4.44.</p> <p>Overall, it is The Applicant’s position that there is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project.</p>	
3.16.17	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Indicative Species Mix	The Consultee agreed in an email on 13 August 2024 for National Grid to proceed on the basis of the current mix with final agreement to be agreed at the detailed design stage. This was reiterated again in an email sent on 23 January 2025.	<p>The Applicant sought to agree the indicative species mix. This includes the proposed mix % distribution and range of heights to be used in the year 15 visualisations (where relevant). This includes a variable distribution across the species to increase future resilience. The proposed indicative species mix was issued to the Consultees on 14 October 2024.</p> <p>The Applicant agree that the species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO (Application Document 3.1 (E) draft Development Consent Order [CR1-027]).</p>	Agreed
3.16.18	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape and Visual value judgements made in the ES	The Consultee agreed to these landscape and visual value judgements in an email on 23 January 2025.	In an email on 16 September 2024. The Applicant requested agreement of the landscape and visual value judgements that are made within the ES (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]).	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.16.19	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape and visual sensitivity ratings made in the ES	The Consultee agreed to these landscape and visual sensitivity ratings via email on 23 January 2025.	In an email on 16 September 2024. The Applicant requested agreement of the sensitivity ratings in the landscape and visual methodology which are presented in the ES (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]).	Agreed
3.16.20	Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]	Presentation of the Visual Assessment Appendix of the ES	The Consultee agreed to the presentation of the visual assessment appendix of the ES in an email on 23 January 2025.	In response to SCC's request to present the visual appendix in the style that was used for the Bramford to Twinstead DCO, which presents the baseline and assessment along with photography, The Applicant presented this to Consultees at the thematic meeting held on 19 November 2024. This is set out in the Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098] .	Agreed
3.16.21	Figure 1 Saxmundham Converter Station Outline Landscape Mitigation within Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Figure 5 Friston Substation Outline Landscape Mitigation within Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Landscape design mitigation plans	The Consultee considers the landscape design mitigation plans to be broadly acceptable and can form the basis for ongoing discussions. The Consultee recommends further consideration is given to more substantial planting options, more than just a hedgerow with trees, along the B1119. This was all communicated via email on 23 January 2025.	The landscape design mitigation plans have been circulated as the design has progressed within thematic meetings. The latest version was sent to stakeholders on 10 October 2024 for comment and agreement. These are now Figure 1 Saxmundham Converter Station Outline Landscape Mitigation and Figure 5 Friston Substation Outline Landscape Mitigation within Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] . Given the timing of the response from SCC, the comments are to be dealt with following submission of the DCO Application.	Under discussion
3.17.22	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Assessment conclusions	The Consultee has reviewed and is satisfied with the landscape and visual assessment.	The Applicant have provided the Consultee with the landscape and visual assessment set out in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] for agreement. As such, this matter remains under discussion.	Agreed
3.13.23	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Hedgerow restoration	With regard to hedgerow restoration, it was advised that 'heavy standards' should not be included as they are not worthwhile. It is better to go for 'light standards' or feathered trees. The key whatever is used is good ground preparation e.g. a tined subsoiler to rip the ground.	The approach to hedgerow restoration discussed was at thematic meetings. Light standards and feathered trees will be used beyond the cable corridor. This is set out in the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]) The Applicant confirm that the comment from ESC came	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				from the ESC landscape team but confirm that the ESC ecology team were present for this conversation.	

Table 3.17 Cultural Heritage

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.17.1	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Photomontage locations	Locations for photomontages to support cultural heritage assessments agreed January 2024. It was agreed in subsequent emails and a meeting on 3 July 2024 that if winter photography cannot be submitted as part of the application submission ES, then an addendum should later be submitted.	Discussions via meetings and emails in late 2023 and early 2024 have agreed heritage photomontage locations.	Agreed
3.17.2	N/A	Assessment of effects at statutory consultation	Acknowledged and agreed the approach to the assessment of effects at statutory consultation within their response to the PEIR.	The assessment of effects on Cultural Heritage were presented within the PEIR. The PEIR is a preliminary assessment, and effects will be further assessed with more detail within the ES chapter in line with the methodology and professional judgement.	Agreed
3.17.3	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Archaeological Evaluation Trenching	The Consultee agrees that the archaeological trial trenching will be approved by SCC via a Written Scheme of Investigation to be produced by the archaeological subcontractor.	Works associated with undertaking the archaeological trenching to be fully agreed by a Written Scheme of Investigation (Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI)- Suffolk [APP-343]) as secured by Requirement 14 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] . This will be produced by the archaeological subcontractor and sent to SCC for approval.	Agreed
3.17.4	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Assessment methodology presented in the ES	The Consultee is currently reviewing the assessment methodology presented in the ES.	The Applicant provided the Consultees with the final cultural heritage assessment methodology set out in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and supporting appendices in the submission of the DCO Application.	Under discussion
3.17.5	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI)- Suffolk [APP-343]	Mitigation presented in the ES and archaeological mitigation strategy	The Consultee considers that the landscape planting proposals as detailed in Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-343] are designed to not cause further harm to the setting of heritage assets. However, the Consultee considers that the assessed impacts to heritage setting would not be fully mitigated and that the implementation of the OLEMP would not lessen the adverse impacts on every nearby heritage asset.	The maturation of screening planting is assessed by the Applicant to lessen adverse impacts to Saxmundham Conservation Area, the Church of St John the Baptist and Hurts Hall as detailed in Section 3.11 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and in Application Document 9.44 St John’s Church Grade II* Listed Building Assessment [REP1-118] . This relates mainly to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the assets’ settings. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in residual effects identified.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.17.6	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Assessment conclusions presented in the ES	<p>The Consultee disagrees with some of the assessment conclusions presented in the ES.</p> <p>The Consultee agrees with the conclusions regarding the magnitude of impact on the Saxmundham Conservation Area, St John the Baptist and Hurts Hall, however disagrees that there would be no impact on Hill Farmhouse and instead considers that there would be an impact of medium adverse magnitude on Hill Farmhouse, leading to an effect of moderate adverse significance.</p> <p>The Consultee agrees that following landscape mitigation, the residual effect on the Saxmundham Conservation Area and St John the Baptist would be of minor significance, however considers that the magnitude of the impact on Hurts Hall and on Hill Farmhouse would remain at a medium level. The incongruent presence of the Converter station in the landscape, by virtue of its scale, would not be mitigated by the proposed landscaping. Additionally, the proposed landscaping around the new permanent access and bridge over the River Fromus would vary in different seasons, and would only soften, not remove, their visual impact in the setting of Hurts Hall. The significance of the effect on Hurts Hall and Hill Farmhouse is therefore considered to remain moderate adverse.</p>	<p>The Cultural Heritage assessment of Hill Farmhouse in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] identified no impact to Hill Farmhouse as a result of the Suffolk Onshore Scheme and no mitigation is therefore proposed in order to reduce effects to this heritage asset.</p> <p>The reduction in the residual significance of effect reported in Section 3.11 of Application Document Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] in relation to Hurts Hall as a result of the maturation of screening vegetation at Year 15 of Operation is mainly related to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the asset's setting. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in the residual minor adverse significance of effect assessed at Hurts Hall.</p>	Under discussion
3.17.7	N/A	Neolithic henge at Friston substation site	<p>ESC understands from an additional submission made to PINS on 18 August 2025 [AS-074] that “a Neolithic hengiform monument has been identified in the Parish of Friston” at a “previously unknown site of high archaeological significance”.</p> <p>ESC was previously unaware of this discovery and whilst we defer to SCC Archaeological Service (SCCAS) and Historic England on the management and handling of such archaeological matters, ESC shares SCC’s significant concerns. We understand that the Neolithic henge is located directly on top of the Applicant’s proposed cable corridor and ask that the appropriate level of assessment and mitigation is accorded to this newly identified and significant project constraint.</p>	<p>This has been addressed in the Change Request submission. See Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. The approach taken was agreed with Historic England and SCCAS in October 2025.</p>	Under discussion

Table 3.18 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.18.1	Application Document 9.83 Outline Code of Construction Practice submitted at Deadline 3 Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Use of Non-Road Mobile Machinery (NRMM)	The Consultee would like to see a commitment to reduce emissions from NRMM which should include: - commitment to use renewable energy as soon as possible in the project. - the use of Stage 4 NRMM as a minimum and stage 5 where possible - the use of an exemptions process with a target annual cap of plant that cannot achieve the emission standards. To include a registration scheme and reporting of this to the LPA. - a commitment to use of NRMM unable to meet the standard, deployed in areas of least impact i.e. furthest from receptors.	The Applicant commits to several control measures relating to NRMM emissions, which have been included in the CEMP (Application Document 9.83 Outline Code of Construction Practice submitted at Deadline 3), as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] , including; - AQ04 - Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable; - AQ09 - Ensure all equipment complies with the appropriate NRMM standards. Use stage 4 NRMM as a minimum and stage 5 where possible. Additionally, where possible, use alternative / renewable energy to power NRMM; and - GG11 - Any activity carried out or equipment located within a construction compound that may produce a noticeable nuisance, including but not limited to dust, noise, vibration, and lighting, will be located away from sensitive receptors such as residential properties or ecological sites where practicable.	Agreed
3.18.2	Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129] Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Construction Monitoring	Real time monitoring should be committed to for both prior to, and during, the project. Numbers of monitors and locations are yet to be decided and will be dependent on predicted impacts. Diffusion tubes should be used to measure NO ₂ impacts, as a cheap and available method to provide additional monitoring locations particularly where NRMM and increased traffic emissions may be experienced. This is still under discussion. ESC is still reviewing this and will update its position in due course.	The Applicant commits to carrying out real-time monitoring of NO ₂ , PM ₁₀ and PM _{2.5} before and during the construction phase as detailed in the Outline Air Quality Management Plan (Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129] , as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027]). Monitoring locations have been discussed and agreed. The Applicant notes that the response from SCC does not specify which school or residential properties within their Statutory Consultation Response from December 2023. Also, since this response, the design and vehicle routing has changed, so these schools and properties that were originally referred to are no longer relevant.	Under discussion
3.18.3	Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129] Application Document 7.5.3 (B) Outline Onshore Construction	Dust management	The Consultee has raised the following comments on dust: Dust It should be reflected that the Dust Management Plan (DMA) and CEMP should be agreed by the LPA.	An Outline CEMP (Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]) has been prepared for the DCO application, which includes proposed mitigation measures for air quality during construction. In addition, an Outline Air Quality Management Plan (Application Document 7.5.6.1 Air Quality Management Plan – Suffolk [AS-129]) has been prepared	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
	Environmental Management Plan (CEMP) [AS-127] Application Document 3.1 (E) draft Development Consent Order [CR1-027]		<p>The assessment for dust has concluded that a high level of mitigation is required. It is agreed that a DMP for the project should be developed, submitted to and agreed with the Consultee</p> <p>Further discussion and clarity is required on the document hierarchy relevant to management and mitigation plans. Construction Method Statements, CEMPs, Management Plans etc should be put in a clear hierarchy. These documents should then be submitted to and approved by the Consultee.</p> <p>ESC are continuing to review and will update its position in due course.</p>	<p>for the DCO Application. This includes mitigation and control measures relevant to air quality including dust during the construction phase and proposed air quality monitoring locations during the construction phase. It has been discussed and agreed that mitigation measures from the Institute of Air Quality Management (IAQM) best practice construction dust guidance would be used. Monitoring locations have been discussed and agreed. Both management plans are secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>	
3.18.4	Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]	Air Quality Assessment and Monitoring	<p>The Air Quality scoping boundary is not currently agreed. Construction related traffic has the potential to cause impact further afield than that proposed for assessment. As such, the Consultee would like to see air quality considered at all the road network significantly affected by the development taking into account cumulative effects with other developments.</p> <p>It is essential that consideration is given to a Cumulative Impact assessment and sensitivity assessment regarding the possibility of fluctuating timelines of both the Proposed Project and other committed developments.</p> <p>ESC notes that SCC, as the Highway Authority, is currently not in agreement with the Applicant in relation to impacts on traffic. This calls into question whether the impacts of traffic have been adequately assessed within the air quality assessment. ESC therefore considers that the air quality assessment may need to be revisited once specific impacted areas have been identified by SCC / the Applicant.</p> <p>ESC notes that, given the level of development in East Suffolk and the increase in traffic on the roads, it is important that consideration is given to those areas that may fall outside of the EPUK guidelines for assessment but the impact is locally significant. ESC also notes that comparison of the input data for the air quality modelling of emissions from vehicles associated with the development to traffic data within the transport/traffic documents is difficult and requires further justification.</p>	<p>Construction vehicle emissions have been assessed, and detailed modelling has been undertaken where the construction flows in the peak construction year exceed the Environmental Protection UK(EPUK) & IAQM screening criteria. The construction vehicle emissions modelling area has been discussed and agreed, and results have been presented. Changes in nitrogen dioxide (NO₂), particulate matter less than 10 microns in diameter (PM₁₀) and particulate matter less than 2.5 microns in diameter (PM_{2.5}) concentrations at worst case receptor locations on the A12 as a result of construction vehicle emissions associated with the Proposed Project were predicted to be negligible in accordance with the IAQM and EPUK Development Control guidance, with the largest change in NO₂ and PM₁₀ being 0.2µg/m³ (largest change in PM_{2.5} concentrations was 0.1µg/m³). The largest construction traffic flows are predicted on the A12, therefore changes in concentrations elsewhere along the other construction traffic routes would be smaller. Furthermore, these changes are temporary, and are based on peak construction traffic flows. As such, construction vehicle emissions as a result of the Proposed Project have been determined as negligible (not significant).</p> <p>Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142] identifies forecast construction traffic increases across the Study Area for all assessed cumulative schemes combined, excluding the Proposed Project. This is based on the peak construction traffic flows reported or estimated for each cumulative scheme and assumes that these would all overlap. These estimates are therefore overly worst-case. Predicted concentrations for receptor locations using the cumulative flows are presented in Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
				<p>123]. Whilst the cumulative traffic data is based on an unlikely worst case, all predicted concentrations are still well below their respective air quality thresholds.</p> <p>The traffic data used for the assessment was provided by the Applicant's traffic and transport consultants. It should be noted that the data format and structure required for air quality modelling differs from those used in transport and traffic assessments. The traffic modelling as detailed within the transport documents is the basis of the information used to inform the air quality assessment.</p>	
3.18.5	<p>Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]</p> <p>Application Document 3.1 draft Development Consent Order</p>	<p>Emissions from generators</p>	<p>There must be consideration of generators and control of emissions from these.</p> <p>There is no recognition of the agreed commitment to the use of Euro VI HGV, use of the CTOMP providing for GPS monitoring of HGVs and the use of authorised construction routes. There will be a need for some form of checking and logging that all HGVs meet the Euro VI standard.</p>	<p>The Air Quality Chapter of the ES (Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]) considers generator emissions. The outcome of the assessment has been discussed and agreed.</p> <p>Measure GG12 of the CoCP (Application Document 9.83 Code of Construction Practice submitted at Deadline 3) stipulates that HGVs should be Euro VI and measure AQ09 stipulates that all equipment complies with the appropriate NRMM standards, using stage 4 NRMM as a minimum and stage 5 where possible. Further to this, AQ04 requires The Applicant to avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable. These measures have been discussed and agreed.</p> <p>A Traffic Management and Monitoring System is proposed as set out in the Outline Construction Traffic and Management and Travel Plan (CTMTP) for Suffolk (Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]) to monitor HGVs and the use of authorised construction routes.</p> <p>As detailed in the Outline Air Quality Management Plan (Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk [AS-129]), all HGVs will be checked to ensure they meet the Euro VI Standard, and a log will be made as part of the monitoring requirements.</p> <p>All management plans are secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027].</p>	Agreed

Table 3.19 Noise and Vibration

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.19.1	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]	Methodology for construction noise and vibration	<p>Agreed approach in April 2023 and follow up in February 2024. The Consultee asked that the focus of the assessment is on the outcomes in terms of control measures and management, as well as consideration of assessment of cumulative impacts from other projects.</p> <p>ESC considers that the Low Observable Adverse Effect Level (LOAEL) has been set too high. The LOAEL is the point where the Applicant is required to “mitigate and minimise” noise and vibration and this should be based on the baseline noise environment of the area. The project should be mitigating and minimising their impacts on any level above that which is currently experienced. The current LOAEL would suggest that there is no/low impact below this level that is not worthy of mitigation and this is disingenuous.</p> <p>ESC also has concerns with the reliance on the guidance document “Design Manual for Roads and Bridges” (DMRB). This has already been questioned but is clearly still being relied upon to try and demonstrate impact. Whilst we accept it may be useful as a supplementary indicator; we disagree in its use as a fundamental piece of guidance to this project and BS5228 should be the primary standard that controls noise and vibration impact in line with other comparable projects in this area and nationally. The calculated magnitude of impact from DMRB could obscure the real world felt impacts of this project and we would prefer to rely on the practical noise and vibration control measures and principles of BS5228 as has been agreed.</p>	<p>The construction noise and vibration assessment methodology are in accordance with BS 5228:2009+A1:2014. Assessment criteria are agreed based on the lower threshold for the ‘ABC’ method, which is the method used to decide if construction noise could cause significant effect, with ‘A’ being the lowest threshold and is used as the worst-case scenario.</p> <p>To address the Consultee’s point that focus should be on the outcomes of control measures and management, The Applicant confirm that noise control measures and management have been presented in the ES Chapter Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]</p> <p>Cumulative impacts from other projects are considered in the assessment. This has been set out in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]</p> <p>With regards to the LOAEL, this is noted and agreed in principle. The construction noise LOAEL was set relative to guidance values from BS 8233 for suitable internal and external conditions (with open windows for internal levels). However, it is agreed that construction noise may still be audible below this level and may therefore constitute an adverse effect. However, the contractor is required to employ BPM to reduce construction noise and vibration levels for all works irrespective of this threshold.</p> <p>With regards to the use of DMRB LA 111, the Applicant considers this to be suitable guidance to supplement BS 5228. The BS 5228 ‘ABC’ thresholds are for <u>potential</u> significant effects. It states that <i>‘the assessor then needs to consider other project-specific factors, such as the number of receptors affected and the duration and character of the impact, to determine if there is a significant effect’</i>. Additional guidance in this matter has been taken from the DMRB LA 111, which provides temporal thresholds for potential significant effects based on the ‘ABC’ method values, which are not explicitly stated in BS 5228-1 for the ABC method.</p>	Under discussion
3.19.2	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]	Noise survey data	Agreed approach in April 2023 and background noise levels agreed in February 2024. National Grid has discussed with the Consultee the noise and vibration assessment methodology in April 2023, with subsequent liaison occurring regarding the noise survey methodology and locations. The operational noise baseline assessment has been shared by National Grid with the Consultee, with the details, as presented in the ES, being agreed by the Consultee.	Agreement on baseline noise survey methodology and resultant typical background noise levels for use in the operational noise assessment, which has been set out in the ES chapter (Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]).	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
			The Consultee accepts the use of nighttime background sound levels as the appropriate criteria to work from in terms of setting an appropriate noise rating level.		
3.19.3	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]	Construction traffic noise assessment methodology	<p>The Consultee agreed the approach to the construction traffic noise assessment methodology in April 2023 and then in a follow up in February 2024, where the matter was discussed twice and all elements agreed.</p> <p>Road Traffic Noise is a Highways Authority matter and will need to be considered by and agreed with Suffolk County Council Highways in this instance. Construction site traffic should be adequately considered in the site noise management plan under the agreed BS5228 methodology for noise and vibration.</p>	<p>Agreement on assessment methodology for construction traffic noise assessment based on guidance from the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration and Calculation of Road Traffic Noise (CRTN).</p> <p>Cumulative impacts from other projects are considered in the assessment. This has been set out in the ES Chapter Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109].</p> <p>The Applicant confirm that noise from construction site traffic has been assessed in accordance with the agreed methodology, which is in accordance with BS 5228 guidance and the noise data and presented in the ES chapter as referenced above.</p>	Agreed
3.19.4	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]	Assessment mitigation	<p>The Consultee will review the proposed mitigation for noise and vibration effects presented in the ES and other application documents following the submission of the DCO application. Best Practicable Means (BPM) is the standard expected, and this has been committed to, which is welcomed. However, ESC notes that the Applicant has identified that a number of significant impacts are likely to arise without mitigation, but with the application of non-specific ‘mitigation’, all of these significant impacts are resolved. ESC will need to see robust evidence for this in all cases along with the specific details of what mitigation will be used to ensure that not only are significant adverse impacts avoided as required by policy, but that adverse impacts are mitigated and minimised as far as reasonably possible, or preferably avoided entirely.</p> <p>There are multiple mentions of ‘temporal restrictions’ that nullify a number of significant impacts. We have been unable to find a definition or description of these ‘temporal restrictions’ and given their prominence in the mitigation scheme, we will need further detail. It should be noted that significant effects are ruled out during weekend working due to ‘temporal restrictions’, notwithstanding our opposition to weekend (as defined by BS5228-1) any assessment of significance in this period should be based on the weekend criteria of the table E.1 of BS5228-1. We will expect a robust and detailed monitoring strategy to be developed to verify the predictions made in this application and to ensure that noise and vibration limits are being complied with.</p>	<p>The Applicant will provide the Consultees with the noise and vibration assessment set out Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109] along with the Outline Noise and Vibration Management Plan following submission of the DCO application. As such, this matter is still under discussion.</p> <p>Further detailed construction noise and vibration assessments will be undertaken by the contractor, secured though commitment NV03 of Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3. Specific mitigation will be identified and applied by the contractor following their assessment. The mitigation measures will be documented in the NVMP, which will be updated throughout the works and shared, as required, with ESC.</p> <p>Temporal restrictions would be a ‘catch-all’ for potential situations where, despite the use of best practicable means, noise levels may not be able to be kept below the corresponding noise level threshold, thus avoiding significant adverse effects. Such a situation, were it to occur, would still be considered an adverse effect and therefore the requirement to mitigate and minimise potential effects would apply. Hence, temporal restrictions would then form part of the noise mitigation strategy.</p>	Under discussion
3.19.5	Application Document 6.2.2.9 Part 2 Suffolk	Operational noise rating levels	No agreement has been reached beyond the assessment approach taken and the operational noise levels being a low as reasonably practicable. It has not yet been clearly stated	The Applicant’s position is that the converter station will be designed such that noise rating levels are as low as reasonably possible at nearby noise sensitive receptors, and should not	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
	Chapter 9 Noise & Vibration [AS-109] Application Document 6.3.2.9.D (B) ES Appendix 2.9.D Suffolk Operational Noise Assessment [AS-119]		<p>that 35dB is National Grid’s position or how the 35dB level has been derived. Recent discussions have confirmed that the 35dB is a rating level and inclusive of acoustic penalties but the concern about the increase on background sound level this creates remains.</p> <p>Previous discussions have clearly stated that a rating level below agreed representative background sound levels was the design target. The Consultee maintains that due to the character of the area the aim should be to achieve a rating level below background sound level (not above background as stated in the previous cell) with –5dB being the aspiration and have explained this in detail in both of our previous responses. For further context in relation to the 35dB, if adopted this would allow a +10dB to +15dB (dependant on Noise Sensitive Receptor) increase on the agreed nighttime representative background which is significantly more than the applicants “aim to achieve a noise level not exceeding 5 dB above the typical background sound levels” and results in significant adverse impact in terms of BS4142.</p> <p>For clarity, this is a quiet rural residential area as supported by National Grid’s own background sound level assessments and the proposal is to introduce a 24/7 industrial noise source and co-locate other similar projects and noise sources within the same area, notwithstanding that the potential impact of a single project background sound level “creep” is a significant risk with each concurrent project and must be adequately considered and addressed – which has not been the case to date.</p> <p>Noise impacts must be fully considered in relation to not only the co-located converter station site at Saxmundham, but also in terms of overhead lines and the proposed Friston substation (i.e. switchgear noise emissions – being impulsive in character and operation). It is very important to note that the Friston connection substation is part of the site rating levels and therefore it is a site constraint. The Applicant needs to be very confident that introduction of further or different equipment will not impact that constraint.</p> <p>ESC has reviewed the operational noise assessment which makes a number of assumptions and forms the basis for ongoing discussion. That said, ESC will require appropriate noise rating levels to be proposed at all, or a selection of representative, noise sensitive receptors to form the basis of an operational noise limit requirement in the DCO. This is essential in order to allow noise levels from the project to be verified and provide a basis to regulate the substation in the event that complaints are received in the future. It is accepted</p>	<p>exceed 34 dBA L_{r,Tr}. The Applicant will also seek to achieve the aims of East Suffolk Council, where reasonably possible, or otherwise as low as reasonably possible. However, it is unlikely that meeting the aim of East Suffolk Council (i.e. a noise rating 5 dB below the representative background sound level) is achievable and this has been communicated to East Suffolk Council. Additionally, this aim is significantly above and beyond the requirements of national planning policy and guidance. The Applicant are therefore committing to going above and beyond the requirements of national planning policy and guidance with regards to operational noise. This has been set out within the ES Chapter (Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]) and the appendices (Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [AS-119]).</p> <p>Cumulative impacts from other projects are considered in the assessment where applicable. It is considered that the 34 dB L_{r,Tr} limit should apply cumulatively to the Proposed Project and future projects in the vicinity. This would therefore avoid the potential issue of ‘noise creep’ leading to significant adverse effects.</p> <p>East Suffolk Councils statement of “<i>For further context in relation to the 35dB, if adopted this would allow a +10dB to +15dB (dependant on Noise Sensitive Receptor) increase on the agreed nighttime representative background which is significantly more than the applicants “aim to achieve a noise level not exceeding 5 dB above the typical background sound levels” and results in significant adverse impact in terms of BS4142</i>” is incorrect, as it does not account for context as required by BS 4142. Context requires consideration of the resultant ambient noise levels, amongst other considerations. In this case resultant absolute noise levels would be below the LOAEL, and therefore cannot be considered to be a significant adverse effect. That said, despite noise levels being below the LOAEL, the Applicant are committing to designing the converter station such that noise rating levels are as low as reasonably possible below this level.</p> <p>An assessment of noise from changes to the existing overhead line near the proposed Friston substation is presented in Application Document 6.3.2.9.E (B) Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [AS-121].</p>	

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
			<p>that as Saxmundham is a co-located site, this introduces certain issues in terms of differentiating noise levels from multiple sources, and this will need some discussion going forward. However, this does not remove the need for appropriate operational noise limits to be set. It is likely that even with rating levels agreed, ESC will ask for a commitment by NGET to reduce levels in the final detailed design and that this will also be included in the operational noise requirement.</p> <p>Noise rating levels have been agreed, it will be necessary to undertake monitoring to verify those levels when operational and in the event that complaints are received.</p>		

Cumulative Effects

Table 3.20 Cumulative Effects

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.20.1	Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]	Cumulative Schemes – methodology	<p>A meeting was held with the Consultee on 20 November 2024, where the cumulative assessment methodology was presented. The Consultee agreed to the methodology presented in the meeting.</p> <p>The Consultee reviewed the methodology set out in Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091], following submission of the DCO application.</p> <p>ESC is satisfied with the methodologies used in the intra-project and inter-project cumulative assessments.</p>	<p>The Applicant presented the cumulative assessment methodology on 20 November 2024, and this was agreed with the Consultee.</p> <p>The Applicant provided the cumulative effects assessment methodology in Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091].</p>	Agreed
3.20.2	Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092] and Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]	Cumulative Schemes – short list and long list	<p>A meeting was held with the Consultee on 20 November, where the Short List and Long Lists were presented.</p>	<p>The long list and short list are provided within Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092] and Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093].</p> <p>The assessment can be updated during examination if developments come forward that would make the short list. This updated assessment would be provided at a suitable deadline in the examination timetable.</p>	Under discussion
3.20.3	Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083]	Conclusions of the Cumulative Effects Assessments	<p>The Consultee is yet to agree with the conclusions set out in the Cumulative Effects Assessment (CEA).</p> <p>The Consultee will review these conclusions in due course, following submission of the DCO application.</p>	<p>The Applicant has presented the Cumulative Effects assessment in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059], Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083], Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [[REP1A-011] and Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086].</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
	<p>Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]</p> <p>Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]</p>				
3.20.4	N/A	Available workforce	ESC will provide its position with regard to impacts on workforce in due course.	Noted.	Under discussion
3.20.5	<p>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p> <p>Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083]</p> <p>Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]</p> <p>Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]</p>	Conclusions of the Cumulative Effects Assessments	<p>The Consultee is yet to agree with the conclusions set out in the CEA.</p> <p>The Consultee will review these conclusions in due course, following submission of the DCO application.</p>	Noted.	Under discussion

Policy, need, site selection and design

Table 3.21 Policy, need, site selection, coordination and design

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status ESC
3.21.1	N/A	Status of National Policy Statements for Energy	The status of the National Policy Statements (NPSs) was agreed by the Consultee as per the statutory consultation (statutory consultation response paragraph 3.1: <i>“The Energy NPSs were updated in November 2023 with the publication of revised NPSs EN-1 to EN-5”</i>)	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5). The relevant Energy NPSs form the primary decision-making framework for the DCO application.	Agreed
3.21.2	N/A	Status of Local Development Plan policy	The currently adopted development plan policy relevant to the Proposed Project’s location in East Suffolk is the Suffolk Coastal Local Plan (adopted 23 September 2020) and the Saxmundham Neighbourhood Plan (made 26 July 2023).	Whilst the DCO application is required to be determined in accordance with the relevant NPSs, the SoS may consider Local Plans to be important and relevant to their decision making. The Local Plans for ESC and SCC are set out in their respective positions. In accordance with paragraph 4.1.15 of NPS EN-1, in the event of a conflict between NPS policy and local planning policy, the NPS will prevail for the purpose of Secretary of State (SoS’s) decision making.	Agreed
3.21.3	N/A	Local Plan allocations	The following Local Plan allocations shown on the Suffolk Coastal Local Plan (adopted 23 September 2020) policy map are located in the draft Order Limits: SCLP9.3 Coastal Change Management Area (below ground DC cable and landfall) SCLP11.8 Parks and Gardens of Historic or Landscape Interest (northern access option to Converter Station site). [AONB/National Landscape Area (below ground DC cable and landfall)]	The Development Plan allocations identified in ESC and SCC’s position columns are located within the draft Order Limits.	Agreed
3.21.4	Application Document 5.1.6 Appendix E Statutory Consultation (APP-309 to APP-312)	Need for the project	The Consultee considers the reinforcement is not yet required. It is understood the need for the project arises when and if the Sizewell C new nuclear power station and LionLink are operational (and the latter is not yet consented). The Consultee considers that the implementation of Sea Link, if consented, should be conditional on the other two projects being committed. If the Proposed Project were to connect to an offshore platform provided under either the Five Estuaries or North Falls DCO projects (if consented and implemented), the capacity of the Proposed Project for grid reinforcement must then be reduced. As the need case for the Proposed Project	The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons: 1) the existing transmission network was not designed to transport electricity from where The Applicant increasingly now generate it (largely offshore) 2) the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport 3) as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status ESC
			has been presented as solely grid reinforcement, the Consultee would require further information on what this means for the required grid reinforcement. If the Proposed Project, in connecting offshore wind farm projects means that the capacity of the currently proposed grid reinforcement will be reduced leading to a requirement for an additional reinforcement project this would be of serious concern to the Consultee. The consequential implications for the transmission infrastructure need to be considered at the same time as the proposals for the coordination of the Proposed Project, North Falls and Five Estuaries.	4) upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards. The Proposed Project is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future.	
3.21.5	Application Document 8.3 Strategic Options Report (October 2023) [APP-370]	Strategic Options	The Consultee has reviewed the strategic options appraisal presented in the Strategic Option Report, Version A (Application Document 8.3 Strategic Options Report (October 2023)) and agree with the approach and conclusions.	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, version A, October 2023, (Application Document 8.3 Strategic Options Report (October 2023) [APP-370]) included as part of Statutory Consultation, is agreed.	Agreed
3.21.6	Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]	Site selection	The Consultee has reviewed the Option Selection and Design Evolution report (Application Document 8.2 Options Selection and Design Evolution Report (October 2023)) and agree with the methodology and conclusions of the site and route selection.	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023, included as part of Statutory Consultation (Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]) is agreed.	Agreed
3.21.7	Application Document 7.12.1 Design Principles – Suffolk [APP-366] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Design review process and masterplan	The Design Principles – Suffolk (Application Document 7.12.1 Design Principles – Suffolk) document sets out the principles for design of the project and involvement of Local Planning Authorities in the finalisation of the design. The document includes design principles for Saxmundham Converter Station, which are secured by Requirement 3. The Project Level Design Principles recognises the intention to both carry out a follow up Design Review Panel (DRP) and further thematic meetings scheduled in advance of submitting information to discharge requirement 3. Requirement 3 requires that National Grid submit details of the layout, scale and external appearance to the relevant planning authority, for confirmation details are in general accordance with the Key Design Principle. Design principles are also included for Friston Substation and the Fromus Bridge, with both secured through the REAC. It is noted that Friston Substation as proposed as part of the Proposed Project is significantly smaller than that consented through the SPR project.	Design principles are included for Friston Substation and the Fromus Bridge and both are to be secured through the REAC. The Order Limits for the Proposed Project around the Friston substation are different to that of EA1N and EA2. The EA1N and EA2 consents include powers for three substations at Friston, including an air insulated switchgear (AIS) The Applicant substation (with a larger footprint than the gas insulated switchgear, or GIS, alternative), and three cable sealing end compounds (CSEs). The Proposed Project application, in scenario 2, seeks powers only for a single substation using GIS technology, and no CSEs.	Under discussion

Table 3.22 Consultation

Ref	Relevant Application Document	Summary of Description of Matter	ESC Current Position	National Grid Current Position	Status
3.22.1	Application Document 5.1 Consultation Report [APP-301]	Consultation Strategy	Agreed	The Consultation Strategy has been prepared taking account of input from the Consultees. The final version was issued to the Consultees on 20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	Agreed
3.22.2	Application Document 5.1 Consultation Report [APP-301]	Consultation Zones	Agreed	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory.	Agreed
3.22.3	Application Document 5.1 Consultation Report [APP-301]	Statement of Community Consultation	Agreed	The Consultees were consulted by The Applicant on the Statement of Community Consultation and The Applicant had regard to those comments.	Agreed

Table 3.23 Other Matters

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.23.1	N/A	Reductions applied to the proposed order limits over the pre-application stage	<p>ESC welcomes the broadening of the Order Limits to the south of the converter station site to allow flexibility of drainage route. However, ESC remains concerned about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. This area also provides an opportunity to commit to early planting close to receptors.</p> <p>Additionally, ESC is aware of concerns and comments from other stakeholders, including Benhall and Sternfield Parish Council, about the Order Limits, specifically concern about the safety of vulnerable road users and the need for the Order Limits to be sized to accommodate the necessary mitigation and safety measures to address these concerns. ESC defers detailed comments on highways matters to Suffolk County Council as the Local Highway Authority but reiterates the need for the project to fully mitigate potential impacts and maximise opportunities for long-term enhancement and to ensure that legacy opportunities are maximised, including improved connections and linkages for our communities.</p>	<p>The Order Limits to the south of the B1119 have been widened in the Change Request submitted in November 2025. See Application Document 9.76.2 (A) Change Request Report [CR1-052] for further details. Change 5 has increased the area for maintenance of the new hedge proposed to the south of the B1119. The ExA accepted the five proposed changes in this Change Request for examination on 5 December 2025.</p> <p>ESC's concerns around vulnerable road users are also noted and the Applicant will continue to engage with ESC and SCC highways.</p>	Under discussion
3.23.2	Application Document 2.13.1 Design and Layout Plans – Suffolk [APP-037]	Front End Engineering Design (FEED) - Access Layouts	The Consultee requests that proposed accesses onto the highway should be presented with accurate and realistic visibility splay requirements, so that roadside hedgerow and tree removal has been adequately assessed.	Visibility splays are shown on the bellmouth layouts in Application Document 2.13.1 Design and Layout Plans – Suffolk [APP-037] .	Under discussion
3.23.3	Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	Construction Vehicle Routing	The Consultee requests that larger vehicles should avoid narrow rural roads and passing through Saxmundham or Leiston.	<p>The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027]. The southern access on the B1121 has been taken forward, which will minimise construction vehicles passing through Saxmundham. The B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by abnormal vehicles under careful management. Otherwise, this route will not be used by HGVs and the Proposed Project is not therefore expected to have any impacts on this route.</p> <p>The assessment set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] includes the routes from the A12 towards the</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.23.4				proposed converter station on the B1121 south of Saxmundham. The construction access route will pass the northern extent of Benhall but will not pass the key services and facilities within the village.	Under discussion
			The Consultee requests that larger vehicles should avoid narrow roads through Aldeburgh and Thorpeness, and that constraints at the Aldeburgh roundabout are considered.	The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] , as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] . Following receipt of feedback, traffic through Aldeburgh including via the Aldeburgh Roundabout has been restricted to less than 10 HGVs daily, the majority of construction traffic will access the landfall location via the new haul road being constructed. Access to the foreshore will be limited to light vehicles for monitoring purposes. No construction vehicles are expected to travel along the B1353 towards Thorpeness as a result of the Proposed Project.	
3.23.5	Coastal change	<p>ESC considers that insufficient information has been provided in relation to coastal processes and expected erosion rates. Little information has been provided about how the landfall site will be monitored and mitigation implemented should the need arise to keep the cable buried under the foreshore. ESC considers that more information is required in relation to how the Applicant will monitor and report on coastal change, both during construction and operation. Regular surveys are also required to inform approaches taken at the landfall site during decommissioning of the project (i.e. whether to leave the cables buried in situ or remove them). Either way, remedial environmental measures and funds would be required.</p> <p>ESC also considers that the Applicant has failed to acknowledge the very serious coastal erosion issues residents of Thorpeness are already facing, alongside the construction of Sizewell C nearby, and East Anglia TWO making landfall in the area. ESC considers that the impact the cable landfall could have on geomorphology throughout its lifetime (including applying the probable climate change scenarios) has not been sufficiently explored and modelled by the Applicant.</p>	<p>Over the operational lifetime of the Proposed project, monitoring of the beach profile and erosion rates will be carried out at the Suffolk landfall site, as detailed in the Offshore Construction Environmental Management Plan (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3).</p> <p>Data from the Inspection, Maintenance and Repair (IMR) programme will also be assessed in conjunction with data from the DEFRA/Anglian Coastal Monitoring Programme (ACMP).</p> <p>With regard to the impact of the cable landfall, the conceptual design for the cable provides embedded mitigation by installing the cables in ducts at 19-25m depth beneath current beach/foreshore levels. A cross-sectional drawing of the conceptual design is provided in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]. The drawing shows that even if existing beach levels were lowered to the level of the seabed at the HDD break-out point due to natural processes, this would not lead to exposure of the cable due to the proposed burial depth being significantly lower.</p>	Under discussion	
3.23.6	Engagement with Suffolk Design Review Panel	ESC welcomes the project’s engagement with the Suffolk Design Review Panel and its feedback is an important element for NGET to consider and incorporate into the final bridge	The Applicant will ensure that the final bridge design is as visually recessive as possible, whilst confirming to the Critical	Under discussion	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			design. It is important that the DCO includes the appropriate consenting mechanism to secure the most appropriate bridge design possible, including genuine engagement with key stakeholders.	<p>Design Constraints set out in Application Document 7.12.1. Design Principles – Suffolk [APP-366].</p> <p>The Applicant will submit details of the final design including a technical statement, drawings, and 3D renders of the design the ESC, to demonstrate how the design addresses various key areas in ways that reduce impacts. This is set out in commitment LV14 in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3, which is secured by Requirement 6 of Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3.</p>	

4. Approvals

Signed	
On Behalf of	Consultee
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

Signed	
On Behalf of	NGET
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

5. References

- Ministry of Agriculture, F. a., & Ministry of Agriculture, Fisheries and Flood. (1988). *Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land (ALC011)*. Retrieved from <https://publications.naturalengland.org.uk/publication/6257050620264448>
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Appendix A

Record of Engagement

Date	Topic/Engagement type/Attendees	Discussion points
21 and 26 August 2020	National Grid, SCC and ESC, Meeting to introduce the work Essex County Council and Mid National Grid needs to take forward Suffolk and & Babergh District to develop and consult on two Council – Sea Link and Bramford electricity reinforcements – to Twinstead Introductory Briefing.	Bramford to Twinstead and the HDVC subsea link between East Anglia and Kent (the Proposed Project). The Proposed Project background was introduced, regional context and reinforcement, approach to developing proposals, Proposed Project – how studies identified potential landfall, cable routes and connection points-communications, questions/AOB.
20 October 2021	SCC, ESC and National Grid - Project Introduction Meeting	- Project introduction and update, need case, project programme, consenting strategy, emerging option areas and preferences, routing and siting, consultation strategy.
11 November 2021	SCC, ESC and National Grid - Project Update Meeting	- Project update, consultation strategy and locations, need case and coordination with other projects, routing and siting, community benefits.
09 December 2021	SCC, ESC, National Grid Update Meeting.	- Project update, consenting route and S.35 request, environmental surveys, coordination with other projects, routing and siting, convertor station overview.
13 January 2022	SCC, ESC and National Grid – Project Update Meeting.	- Project update, environmental surveys, coordination with other projects, routing and siting options appraisal and constraints, project programme.
10 March 2022	SCC, ESC and National Grid – Project Update Meeting	- Project update, environmental surveys, consultation and

Date	Topic/Engagement type/Attendees	Discussion points
		<i>engagement, coordination with other projects, project programme.</i>
<i>08 April 2022</i>	<i>SCC, ESC, National Grid and NGV meeting</i>	<p><i>Joint meeting with ESC, SCC, National Grid Ventures (NGV) and National Grid to discuss potential for coordination between the Proposed Project (National Grid) and Nautilus (NGV) projects. Discussion of each project converter station and landfall potential locations. Business separation between NGV and National Grid was also discussed and explained.</i></p> <p><i>Proposed Project update discussed following joint element of the meeting.</i></p>
<i>28 April 2022</i>	<i>SCC & ESC, National Grid and NGV meeting</i>	<p><i>Joint meeting with SCC and ESC, National Grid Ventures (NGV) and National Grid to discuss scope, process and sites in relation to onshore coordination between the Proposed Project (National Grid) and Nautilus projects. Business separation between NGV and National Grid was also discussed and explained.</i></p> <p><i>Proposed Project update discussed following joint element of the meeting.</i></p>
<i>12 May 2022</i>	<i>SCC, ESC and National Grid – Project Update Meeting.</i>	<i>Project update, environmental surveys, coordination with other projects, project programme.</i>
<i>09 June 2022</i>	<i>SCC, ESC and National Grid – Project Update Meeting</i>	<i>Project update, environmental surveys, consultation strategy, sites to be included in non-statutory consultation, project programme.</i>
<i>18 July 2022</i>	<i>SCC, ESC and National Grid - Project Update Meeting.</i>	<i>Project update, environmental survey, Project programme.</i>
<i>11 August 2022</i>	<i>SCC, ESC and National Grid – Project Update Meeting.</i>	<i>Project update, environmental surveys, EIA Scoping, consultation strategy, EIA scoping, Council Member engagement</i>

Date	Topic/Engagement type/Attendees	Discussion points
08 September 2022	SCC, ESC and National Grid – Project Update Meeting.	Project update, environmental surveys, non-statutory consultation, consultation strategy, Council Member engagement dates, site visits, project programme.
17 October 2022	ESC Internal Drainage Board (IDB) and National Grid Meeting – Water Environment	Initial review meeting Agenda: identify all IDB watercourses affected by the proposed works options, confirm that the crossing locations are acceptable, identify any concerns or requirements regarding cable crossing methodology and confirm design criteria to determine discharge flow rate into an IDB watercourse.
20 October 2022	SCC, ESC and National Grid - Project Update Meeting.	Project update, non-stat consultation and consultation strategy, environmental surveys, electromagnetic fields, project programme.
10 November 2022	Site visit National Grid, SCC and ESC	Joint site visit with National Grid, SCC and ESC visiting emerging preference landfall location and convertor station option Site 1.
08 December 2022	SCC, ESC and National Grid - Project Update Meeting.	Project update, non-statutory consultation, scoping opinion, upcoming site visit, environmental surveys, project programme.
13 December 2022	Site visit with National Grid, SCC, ESC, Suffolk Wildlife Trust, RSPB, Natural England (NE), Environment Agency (EA)	Discussion of trenchless cable installation under RSPB reserve, exit pit, compound locations, convertor station design
16 January 2023	Email to SCC & ESC from National Grid	Email from National Grid to SCC and ESC providing update on options in Suffolk
09 February 2023	SCC, ESC and National Grid - Project Update Meeting.	Project update, non-statutory consultation feedback, scoping opinion, specialist thematic meetings to be arranged, Planning Performance Agreement (PPA) and engagement plan, coordination with other projects, project programme.

Date	Topic/Engagement type/Attendees	Discussion points
09 March 2023	SCC, ESC and National Grid Project Update Meeting.	- Project update, PPA, Host Authority Engagement Plan (HAEP), Communication Strategy, options consideration and communication.
20 April 2023	SCC, ESC and National Grid Project Update Meeting.	- Project update, Great Grid Upgrade, Co-location and coordination with other developers' projects, PPA
11 May 2023	SCC, ESC and National Grid Project Update Meeting.	- Project update, ground investigation, PPA, Statement of Common Ground (SoCG), Non-statutory consultation outcomes
24 May 2023	SCC, ESC, NE and National Grid Meeting – Landscape and Visual	Project update and timeline, viewpoints, study area and photomontages, approach to LVIA, landscape mitigation strategy and AOB / questions
08 June 2023	SCC, ESC and National Grid Project Update Meeting.	- Project update, ground investigation, PPA, Landscape design, Statement of Community Consultation, Friston Substation design development
13 July 2023	SCC, ESC and National Grid Project Update Meeting	- Project update, Statement of Community Consultation, ground investigation, Engagement Plan/PPA, Site notices for statutory consultation, Converter Station design
09 August 2023	SCC, ESC and National Grid Socioeconomics, Recreation and Tourism Meeting.	- High-level project overview, scope, methodology, baseline sources, sensitive receptors.
28 April 2023	ESC, SCC and National Grid Noise and Vibration Meeting	- Engagement relating to the noise and vibration assessment methodology, and baseline noise surveys.
14 September 2023	SCC, ESC and National Grid Project Update Meeting.	- Project update, NE meeting, Biodiversity Net Gain, RSPB meeting, surveys, Statement of Community Consultation, PPA
16 October 2023	SCC, ESC and National Grid Health and Wellbeing Meeting	- Engagement relating to the PEIR – covered a high-level project

Date	Topic/Engagement type/Attendees	Discussion points
		overview, scope, methodology, baseline sources, sensitive receptors in relation to health and wellbeing.
08 December 2023	SCC, HE and National Grid - Virtual Thematic Group Meeting with HE and Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on results of the geophysical survey and proposals around archaeological evaluation trenching.	
18 December 2023	ESC Statutory Consultation Response Letter.	This letter was in response to the 2023 Statutory Consultation. ESC raised concerns over the need for the Proposed Project, impact on coastal processes, operational noise and vibration, construction noise and vibration and interproject cumulative effects, air quality, landscape, design and heritage, ecology, tourism and economy and community compensation. ESC also confirmed that they objected to the Proposed Project due to harm to communities, environment and economy of Suffolk.
04 January 2024	SCC Highways information issued	National Grid issued additional plans as requested by SCC, including visibility splays.
08 January 2024	SCC, ESC and National Grid – Project program, engagement to date, FRA approach	
18 January 2024	SCC, ESC and National Grid – Project update, ground investigation, geophysical surveys, statutory consultation feedback overview, thematic meetings, PPA	
05 February 2024	SCC, ESC and National Grid - Engagement relating to the PEIR outcomes for noise and vibration and next steps.	
06 February 2024	ESC, SCC and National Grid - Air Quality Meeting	Engagement relating to the air quality assessment methodology and statutory consultation feedback responses

Date	Topic/Engagement type/Attendees	Discussion points
08 February 2024	SCC, ESC and National Grid – Project Update Meeting.	Current activity and surveys update, thematic meetings update, PPA, SoCG, Converter Station design,
09 February 2024	SCC, ESC and National Grid – Socioeconomics, Recreation and Tourism Meeting	Project update and timeline, socio-economic statutory consultation feedback and responses (tourism economy, PRow, study area, surveys) discussion, next steps.
14 February 2024	SCC and National Grid - Geology and Hydrogeology for Minerals Meeting	Project update and timeline, statutory consultation overview, minerals update,
15 February 2024	SCC, ESC and National Grid – Geology and Hydrogeology Meeting	Project update and timeline, statutory consultation, geology and hydrogeology updates, thematic meetings and AOB/questions.
15 February 2024	SCC, ESC Ecology and National Grid - Terrestrial Ecology Thematic Meeting	Ecology including horizontal direct drilling, skylark nesting, survey coverage, dormouse damaged tubes, biodiversity net gain, hedgerow restoration, temporary access roads, important hedgerow standards to include bats.
19 February 2024	SCC, ESC and National – Health and Wellbeing Thematic meeting	Project update and timeline, health and wellbeing update and timeline, statutory consultation feedback (assessment guidance, additional planning guidance, and employment and income assessment), discussion, next steps
27 February 2024	SCC, ESC, Natural England, National Landscape and National Grid – Landscape and Visual Meeting	Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, effects on the National Landscape / Heritage Coast, design principles and landscape strategy, outline landscape and ecology management plan and questions

Date	Topic/Engagement type/Attendees	Discussion points
28 February 2024	SCC, ESC and National Grid - Transport Meeting	Transport meeting to provide a project update and to review statutory consultation (PEIR) feedback
04 March 2024	SCC, ESC, EA and National Grid – Water Environment Meeting	Previous meeting action progress, Sequential Test update, baseline flood risk data, River Fromus crossing, drainage design updates
14 March 2024	SCC, ESC and National Grid – Project Update Meeting	Current activity and surveys update, thematic meetings update, PPA, community benefits, ESO East Anglia Network Study findings
21 March 2024	SCC, ESC and National Grid – Agriculture and Soils Meeting	Presentation of approach to Agricultural Land Classification (ALC) surveys and assessment. Discussion included details on gap filling using predictive ALC approach, mitigation and soil management plans.
11 April 2024	SCC, ESC and National Grid - Project Update Meeting.	Project update and timeline, thematic meetings, PPA, masterplanning
24 April 2024	SCC, ESC, Natural England, National Landscape and National Grid – Landscape and Visual Meeting	Project update and timeline, confirm agreement on aspects of the LVIA, long-distance cycling/walking routes that National Grid should consider in the assessment, mitigation design concepts, co-location illustrative masterplanning update.
April 2024	National Grid, ESC and SCC – Ecology Information Shared	The First season (2022-23) Breeding and Wintering bird reports for Suffolk were shared with ESC and SCC by National Grid for information.
09 May 2024	SCC, ESC and National Grid – Project Update Meeting.	Project update and timeline, thematic meetings, PPA, masterplanning
28 May 2024	National Grid, ESC and SCC – Landscape and Visual Information Shared (via email)	The Landscape and Visual Study area, Landscape Character receptors – District, Seascape Character receptors, representative

Date	Topic/Engagement type/Attendees	Discussion points
		<i>viewpoint locations, LVIA approach and methodology, photomontage methodology, sequential cumulative visual assessment, scope out year 15 for Landfall and Cable Route and the Heritage Coast Assessment were all shared with SCC and ESC by National Grid for agreement.</i>
<i>28 May 2024</i>	<i>SCC, ESC and National Grid Meeting – Landscape and Visual</i>	<i>Project update and timeline, LVIA and agreements, long distance cycling/walking routes, Design Mitigation, Co-location Illustrative Masterplanning update</i>
<i>May 2024</i>	<i>National Grid, ESC and SCC – Ecology Information Shared</i>	<i>A preliminary noise assessment – contour maps only – for Suffolk (not part of the DCO documentation) was shared with both ESC and SCC by National Grid for information.</i>
<i>06 June 2024</i>	<i>National Grid, ESC and SCC – Landscape and Visual Information Shared (via email)</i>	<i>The Provisional Growth Rates, Suffolk Indicative Species Mix and oLEMP Draft Structure were all shared with ESC and SCC by National Grid for agreement.</i>
<i>07 June 2024</i>	<i>SCC, ESC, NE, National Grid - Terrestrial Ecology Thematic Meeting</i>	<i>Summary of terrestrial ecology survey and assessment work since last meeting / confirmation of use of trenchless techniques, depth of drill and risk of frac out / noise modelling results regarding disturbance of adjacent SSSI and SPA from HDD and associated works / temporary loss of woodlark and nightjar foraging habitat outside SPA / proposals for offsetting loss of skylark nesting habitat / proposals for creation/enhancement of acid grassland / Biodiversity Net Gain opportunities</i>
<i>13 June 2024</i>	<i>SCC, ESC and National Grid – Project Update Meeting.</i>	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>

Date	Topic/Engagement type/Attendees	Discussion points
19 June 2024	SCC and ESC Joint Letter to National Grid regarding Masterplanning	This is a joint letter received from SCC and ESC and raises concerns related to masterplanning and access at the proposed converter station location near Saxmundham as well as questions on coordination opportunities with other projects.
19 June 2024	SCC, ESC and National Grid - Socioeconomics, Recreation and Tourism Meeting	Project update and timeline, socio-economic statutory consultation feedback and responses (tourism economy, PRow, study area, surveys) discussion, next steps.
25 June 2024	SCC, ESC, Natural England, National Landscape and National Grid - Landscape and Visual Meeting	Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, effects on the National Landscape / Heritage Coast, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB
July 2024	National Grid, ESC and SCC – Documents Shared (via email)	The draft DCO, short Project Description, example works plans, explanatory memorandum and HRA report were shared with ESC and SCC for comment by National Grid.
02 July 2024	ESC, SCC and National Grid - Air Quality Meeting	Engagement relating to project updates, the Air Quality Management Plan, proposed construction phase air quality monitoring locations and statutory consultation feedback responses.
11 July 2024	SCC, ESC and National Grid - Project Update Meeting.	Project update and timeline, thematic meetings, PPA, masterplanning
12 July 2024	National Grid, ESC and SCC - Landscape and Visual Information shared (via email)	The Landscape and Visual Draft Photosheet was shared with ESC and SCC by National Grid for agreement.

Date	Topic/Engagement type/Attendees	Discussion points
15 July 2024	National Grid, ESC and SCC - Landscape and Visual Information shared (via email)	The Suffolk VP locations were shared with ESC and SCC by National Grid for agreement.
16 July 2024	SCC, ESC and National Grid – Transport/Public Rights of Way Meeting	Targeted Consultation – Introduction, Design Changes, Additional PEI, Core Working Hours; Public Rights of Way – PEIR Finding, Emerging Design, Statutory Consultation Feedback, Outline PRow Management Plan, AOB/questions
31 July 2024	National Grid, ESC and SCC - Landscape and Visual Information shared (via email)	The photosheet template VP01 was shared with ESC and SCC by National Grid for agreement.
02 August 2024	National Grid, ESC and SCC – Landscape and Visual Information shared (via email)	The representative viewpoint locations and growth rate for the Proposed Project were shared with ESC and SCC by National Grid for agreement.
02 August 2024	National Grid, ESC and SCC – Landscape and Visual Information (via email)	The planting heights for mitigation planting within year 15 photomontages was shared by National Grid with ESC and SCC for review and comment.
05 August 2024	SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting	Summary of terrestrial ecology survey and assessment work since last meeting / confirmation of use of trenchless techniques, depth of drill and risk of frac out / noise modelling results regarding disturbance of adjacent SSSI and SPA from HDD and associated works / temporary loss of woodlark and nightjar foraging habitat outside SPA / proposals for offsetting loss of skylark nesting habitat / proposals for creation/enhancement of acid grassland / AOB. In particular, the differences between Design Freeze 2 and Design Freeze 3 were discussed. A request was made to NE that management prescriptions be provided for Sandwich Bay to Hacklinge Marshes SSSI required

Date	Topic/Engagement type/Attendees	Discussion points
		<i>for the site to meet favourable condition</i>
<i>08 August 2024</i>	<i>SCC, ESC and National Grid - Project Update Meeting.</i>	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>
<i>22 August 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The oLEMP draft structure was shared with both ESC and SCC by National Grid for agreement.</i>
<i>27 August 2024</i>	<i>SCC, ESC and National Grid – Landscape and Visual meeting</i>	<i>Project update and timeline, draft photosheet format, viewpoint plans, and growth rates issued on 2 August 2024, LVIA updates, Friston scenarios, update on AONB, update on Design Council and Design Principles,</i>
<i>06 September 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The Suffolk Landscape and Visual Value document and the sensitivity ratings were shared with ESC and SCC by National Grid for agreement.</i>
<i>10 September 2024</i>	<i>SCC, ESC and National Grid – Representative Viewpoints Meeting</i>	<i>Discussion regarding landscape viewpoints, River Fromus Bridge Crossing.</i>
<i>10 September 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The Representative Viewpoints were shared with ESC and SCC by National Grid for agreement.</i>
<i>10 September 2024</i>	<i>Suffolk & Essex Coast & Heaths National Landscape Partnership and National Grid Meeting</i>	<i>Engagement with National Landscape Partnership in regard to how the s85 enhanced duty requirement would be met</i>
<i>12 September 2024</i>	<i>SCC, ESC and National Grid – Project Update Meeting</i>	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>
<i>17 September 2024</i>	<i>ESC NSIP Working Group and National Grid Meeting</i>	<i>Senior project team presented to a cross-party group of councillors and planning officers. Discussions around design, compensation, mental health and coordination.</i>

Date	Topic/Engagement type/Attendees	Discussion points
17 September 2024	SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting	Discussion of whether the bridge across the River Fromus can be moved to preserve the veteran oak and large horse chestnut that would be lost under DF3 alignment. Consideration of whether harvesting of willow plantation along the Fromus will affect BNG (subsequently confirmed plantation will be felled by landowner prior to scheme being commenced). Consideration of how to mitigate the effect of breaching hedgerows on bats e.g. use of hurdles to close gaps overnight. Discussion of duration of skylark plot mitigation.
10 October 2024	National Grid ESC and SCC – Landscape and Visual Information (via email)	The Suffolk Indicative Species Mix was shared with ESC and SCC by National Grid for agreement.
10 October 2024	SCC, ESC and National Grid – Project Update Meeting	Project update and timeline, thematic meetings, PPA, masterplanning
14 October 2024	National Grid ESC and SCC – Landscape and Visual Information (via email)	The Draft Mitigation Design package was shared with ESC and SCC by National Grid for comment.
16 October 2024	National Grid, ESC and SCC – Air Quality information shared (via email)	The methodology for the air quality assessment was shared with both ESC and SCC by National Grid for confirmation and for ESC and SCC to agree the construction monitoring locations.
05 November 2024	Suffolk Design Review Panel	<p>Formal review meeting with Suffolk Design Review Panel (run by Frame Projects). ESC provided briefing to Panel. SCC also in attendance.</p> <p>Purpose of the views of the Panel on the quality of the architecture and treatment of the buildings, the proposed masterplan, including opportunities to share infrastructure with other National Grid Ventures projects, and the approach to integrating the buildings and access</p>

Date	Topic/Engagement type/Attendees	Discussion points
		<i>into the landscape. Comments also welcomed on National Grid's proposed design principles and scope for post-consent design controls.</i>
<i>11 November 2024</i>	<i>SCC and ESC Letter – DRP Follow up</i>	<i>Joint letter from SCC and ESC with comments regarding master-planning of the proposed converter station site near Saxmundham and follow up after Design Review Panel.</i>
<i>14 November 2024</i>	<i>SCC, ESC and National Grid - Project Update Meeting</i>	<i>Project update and timeline, thematic meetings, PPA, masterplanning. The updated Order limits were presented to ESC and SCC. The design changes and rationale behind them were discussed, including compounds at Saxmundham and access to the Saxmundham site.</i>
<i>19 November 2024</i>	<i>SCC, ESC and National Grid - Landscape and Visual Meeting</i>	<i>Project update and timeline, discussion on material circulated to stakeholders, additional discussion points, mitigation design, targeted consultation comments, AOB and questions.</i>
<i>20 November 2024</i>	<i>SCC, ESC and National Grid - Cumulative Effects Meeting</i>	<i>Discussion to review short-list of schemes in Suffolk and the approach for the cumulative assessment work, including for Traffic and Transport. National Grid requested any comments from the Consultees on the short-list and long-list to be provided within 3 days post meeting.</i>
<i>20 November 2024</i>	<i>National Grid, ESC and SCC – Cumulative Impacts Information Shared (via meeting).</i>	<i>The cumulative impacts assessment methodology and the cumulative schemes short list and long list were shared with both ESC and SCC by National Grid, with comments on the long and short list requested to be provided within 3 days post meeting.</i>

Date	Topic/Engagement type/Attendees	Discussion points
25 November 2024	SCC and ESC Letter – Follow-up from DRP feedback	Joint letter from SCC and ESC with comments on the feedback from the Design Review Panel (DRP) and masterplanning.
27 November 2024	National Grid, ESC and SCC – Socioeconomics, Recreation and Tourism Information shared (via email)	The PRow Technical Note was shared with both ESC and SCC by National Grid for feedback and comment on the approach within the Technical Note.
27 November 2024	National Grid ESC and SCC – Landscape and Visual Information (via email)	The Landscape and Visual Impact methodology was shared with ESC and SCC by National Grid for agreement.
November 2024	National Grid, ESC and SCC – Ecology Information	A summary of the impact assessment and proposed mitigation for Suffolk (not part of the DCO documentation but used as the basis for the Suffolk ES chapter) was presented to ESC and SCC by National Grid for information.
December 2024	National Grid, ESC and SCC documents and information shared (via email)	The revised requirements for the draft DCO and a table setting out how National Grid had addressed comments on the draft DCO received from ESC and SCC by the end of October 2024 were shared with ESC and SCC for review and comment by National Grid.
09 December 2024	SCC, ESC and National Grid - Meeting to follow-up on DRP (held on 05 November).	Discussion on masterplanning, design review panel meeting and design principles document.
11 December 2024	SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting (Suffolk proposals)	Approach to Biodiversity Net Gain. Key changes since the last meeting, particularly as a result of DF4. Alternative construction compound locations north of the Converter Station site and presence of Important Hedgerows. SCC indicated a concern over the effect of compound S04/S05 on the nearby Important Hedgerow.

Date	Topic/Engagement type/Attendees	Discussion points
11 December 2024	National Grid, ESC and SCC The Ecology information shared (via email)	The Habitats Regulations Assessment (HRA) was shared with both ESC and SCC by National Grid following a request made by ESC and SCC.
12 December 2024	SCC, ESC and National Grid – Project Update Meeting	Project update and timeline, thematic meetings, masterplanning, follow-up on BNG Strategy (presented at Terrestrial Ecology Thematic Meeting held on 11 December 2024)
06 January 2025	Road Safety Audits (email)	SCC response on draft audits received.
08 January 2025	SCC, ESC and National Grid - Landscape and Visual Meeting	Project update and timeline, discussion relating to table of agreement, discussion relating to landscape mitigation plans, update on Public Rights of Way,
09 January 2025	SCC, ESC and National Grid – Project Update Meeting	Project update and timeline, thematic meetings, draft DCO updates following LPA review comments, overview of DCO Design Documents, Masterplan / Design Principles / Design Approach Document
16 January 2025	ESC, SCC and National Grid - Air Quality Meeting	Engagement relating to project updates, the assessment findings, and to agree the air quality monitoring locations proposed for the construction phase.
17 January 2025	SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting	Updates since last meeting. Compound choices vs Important Hedgerow: Advance planting – around River Fromus (other than bridge construction footprint) and south of Converter Station; LEMP structure HRA update; habitat management.
29 January 2025	SCC, ESC and National Grid – Construction Working Hours Thematic Meeting	Engagement relating to construction working hours and discussion on noise and vibration.

Date	Topic/Engagement type/Attendees	Discussion points
05 February 2025	ESC and National Grid - Air Quality meeting	Further discussion of air quality monitoring locations proposed for the construction phase.
10 February 2025	ESC, SCC and National Grid – Masterplan update	Discussion on masterplanning and design principles document.
13 February 2025	SCC, ESC and National Grid - Project Update Meeting	Project update and timeline, thematic meetings, update on River Fromus Crossing.
March - onwards	SCC, ESC and National Grid	Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.
25 June 2025	ESC and National Grid	River Fromus bridge design thematic meeting. The meeting discussed the potential treatments for the bridge crossing to inform further ongoing discussion around design and the updates proposed for the River Fromus crossing visualisations.
10 July 2025	SCC, ESC and National Grid	Ecology thematic meeting discussed the Ecology related matters raised in the Suffolk County Council and East Suffolk Council Relevant Representations and other outstanding points to agree from an Ecology perspective from the current draft SoCG.
21 July 2025	SCC, ESC and National Grid	Landscape and Visual thematic meeting related points raised in both the SCC and ESC relevant representations and any other outstanding points to agree from a landscape and visual perspective from the current draft SoCG.
6 August 2025	SCC, ESC and National Grid	In person meeting to discuss the outstanding matters relating to traffic and transport.
9 October 2025	SCC, ESC and National Grid	River Fromus bridge design thematic meeting

Date	Topic/Engagement type/Attendees	Discussion points
<i>10 October 2025</i>	<i>SCC, ESC and National Grid</i>	<i>Socio-Economics, Recreation and Tourism and Health and Wellbeing thematic meeting</i>
<i>16 October 2025</i>	<i>SCC, ESC and National Grid</i>	<i>Flood Risk and Drainage thematic meeting</i>
<i>21 October 2025</i>	<i>SCC, ESC and National Grid</i>	<i>Ecology thematic meeting to run through the Relevant Representation comments from ESC and SCC.</i>
<i>23 October 2025</i>	<i>SCC, ESC and National Grid</i>	<i>Noise thematic meeting</i>

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