

Sea Link

Volume 9: Examination Submissions

Document 9.23: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council

Planning Inspectorate Reference: EN020026

Version: A
January 2026

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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 Statement of Common Ground (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

- 1.1.2 This SoCG has been prepared between the Applicant and Suffolk County Council (SCC). 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 East Suffolk Council (ESC) and 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 it includes focus on the summary of principal matters from SCC’s relevant representation.
- 1.2.2 SCC welcomes the transfer of the joint SoCG into one individual SoCG but considers that further consolidation is needed in Section 3. SCC will seek to work collaboratively with the Applicant in view of this to ensure relevant matters which are agreed, under discussion and not agreed are conveyed clearly and concisely.
- 1.3.2 This SoCG has been shared with SCC for their review and their input has been included ahead of Deadline 3. SCC’s input has been limited at this stage due to the time available for review and other Examination commitments of relevant SCC officers. The review by SCC is therefore ongoing and SCC’s comments on the SoCG and stated positions are qualified accordingly.
- 1.4.2 It will continue to be progressed during the examination period to reach a final position between the Applicant and SCC 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.

- 1.5.2 For the purpose of this SoCG, the Applicant and SCC are jointly referred to as the “Parties”. When referencing SCC alone, they are referred to as “the Consultee”, “the Council” or “SCC”.

1.3 The Role of SCC in the DCO Process

- 1.1.1 SCC are 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 area. 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.
- 1.1.2 SCC’s role in the 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 SCC, 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 certain of the requirements associated with a DCO if consent is granted.
 - Monitoring certain DCO provisions and requirements.

1.4 Description of the Proposed Project

- 1.1.2 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.

- 1.1.2 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.2.2 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.
- 1.3.2 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
AC	Alternating Current
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQS	Air Quality Strategy
ASTI	Accelerated Strategic Transmission Investment
BPM	Best Practical Means
BNG	Biodiversity Net Gain
CCS	Carbon Capture and Storage
CEA	Cumulative Effects Assessment
CEMP	Construction Environment Management Plan
CIPD	Chartered Institute of Personnel and Development
CoCP	Code of Construction Practice
CRTN	Calculation of Road Traffic Noise
CTMP	Construction Traffic Management Plan
CTMTP	Construction Traffic Management and Travel Plan
DCO	Development Consent Order
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
DRP	Design Review Panel
EA	Environment Agency
EIA	Environmental Impact Assessment

Abbreviation/Term	Definition
EMF	Electrical and Magnetic Forces
EPUK	Environment Protection UK
ES	Environmental Statement
ESC	East Suffolk Council
ESDAL	Electronic Service Delivery for Abnormal Loads
FEED	Front End Engineering Design
FRA	Flood Risk Assessment
FTE	Full Time Equivalent
HER	Historic Environment Record
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HUDU	Healthy Urban Development Unit
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAQM	Institute of Air Quality Management
IEMA	Institute of Environmental Management and Assessment
KCC	Kent County Council
LCA	Landscape Character Area
LGV	Light Goods Vehicle
LLFA	Lead Local Flood Authority
(Outline) LEMP	(Outline) Landscape and Ecology Management Plan
(Outline) LEMS	(Outline) Landscape ecology management Strategy)
LHA	Local Highway Authority

Abbreviation/Term	Definition
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
NE	Natural England
NESO	National Electricity System Operator
NGET	National Grid Electricity Transmission
NGV	National Grid Ventures
NaFRA	National Flood Risk Assessment
NMU	Non-Motorised Users
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
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
PIA	Personal Injury Accident
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Rights of Way
REAC	Register of Environmental Actions and Commitments
RSPB	Royal Society for the Protection of Birds
SBIS	Suffolk Biodiversity Information Service

Abbreviation/Term	Definition
SCA	Seascape Character Area
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SCHAONB	Suffolk Coast & Heaths Area of Outstanding Natural Beauty
SCZ	Secondary Consultation Zone
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SPR	Scottish Power Renewable
SRN	Strategic Road Network
SSSI	Site of Special Scientific Interest
STGO	Special Types General Order.
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plans
TA	Transport Assessment
TAN	Traffic Assessment Note
TCPA	Town and Country Planning Application
TRO	Traffic Regulation Orders
TTM	Temporary Traffic Management
UXO	Unexploded Ordnance
WHO	World Health Organisation
WFD	Water Framework Directive
WSIs	Written Schemes of Investigation

2. Record of Engagement

2.1 Summary of discussions

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

3. Areas of Discussion Between the Parties

3.1 Access Route – Benhall Railway Bridge, B1121

Table 3.1 Access Route – Benhall Railway Bridge, B1121

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.1.1	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 9.76.2 (A) Change Request Report [CR1-052]</p> <p>Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]</p>	<p>The use of Benhall Railway Bridge on the B1121 for access</p>	<p>While the Applicant has considered some options, which could themselves have impacts in transport terms, the Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121, a Council asset which forms part of the access route selected by the Applicant to the converter station site. The Council considers that there has not been a sufficient review of access options.</p> <p>The structural condition of the bridge means that it has been restricted to Special Types General Order (STGO). 1 (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads (“AILs”) due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12.</p> <p>As currently designed, this bridge would form critical infrastructure to deliver the Sea Link scheme. Whilst it is under the control and responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.</p> <p>The Council has actively, and repeatedly, tried to engage with the Applicant on this issue in order to find a satisfactory solution prior to submission of the Development Consent Order (“DCO”) application. The Applicant has continually assured the Council that a solution can be found but has yet to provide sufficient detail of a solution that would alleviate the Council’s concerns. The Council considers it unacceptable that the Applicant’s application fails to provide sufficient detail of how it intends to overcome the issues with Benhall Railway Bridge, resulting in this matter requiring exploration during the upcoming Examination. To grant the Applicant powers to implement temporary works without the LHAs approval is considered excessive in these circumstances.</p>	<p>The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs).</p> <p>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 to plan for the movement of AILs.</p> <p>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>However, the Applicant has had a number of positive discussions with SCC since the submission of the DCO application regarding possible methodologies for the strengthening of the Benhall Railway Bridge, if (following detailed assessment) this is necessary.</p> <p>The Applicant has also recently submitted a Change Request to include Benhall Bridge within the Order Limits. The Applicant has undertaken consultation with key stakeholders on this change to further advance discussions on the most appropriate methodology to employ, if necessary.</p> <p>These methodologies include the installation of a ‘mini-bridge’, which could be assembled and moved into place within the highway boundary under a weekend road closure. There also remains the option to permanently upgrade the bridge itself. The inclusion of the highway within the Order Limits would provide greater clarity over the consenting route for any such roadworks.</p> <p>Whichever bridge strengthening methodology is used, suitable Temporary Traffic Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
			<p>SCC has set out its concerns regarding the Benhall Railway Bridge including impacts of disruption whilst works are ongoing, including greater levels of traffic due to diversion through Saxmundham and A12/B1119 Rendham junction, lack of evidence on total number of movements that exceed the current weight limit, coordination of bridge closures with traffic related to other NSIPs in the area including Sizewell C and SPR, lack of detail on temporary traffic management to mitigate impacts of work relating to the bridge.</p> <p>See REP2-062 for further details.</p>	<p>An updated Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] has been submitted with the Change Request which sets out proposals for the management of construction-related traffic along the local highway network during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. Once a preferred and agreed option has been identified for transporting AILs, this report will be updated accordingly with any additional construction traffic management measures required to alleviate concerns.</p> <p>The Applicant will as a matter of course engage with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions, including Network Rail.</p> <p>It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time.</p> <p>The Applicant has started to engage with all other relevant infrastructure providers where there are identified asset interfaces and appropriate design responses and solutions are being developed. For example, there has been further engagement with Network Rail to identify how the asset interfaces can be managed, discussed potential impacts and are in the process of agreeing appropriate mechanisms for safeguarding and mitigation during the Proposed Project's construction programme. This may include an Asset Protection Agreement and Protective Provisions.</p> <p>Further information regarding Benhall Railway Bridge is provided in the Change Request, see Application Document 9.76.2 (A) Change Request Report [CR1-052] and Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</p>	
3.1.2	Application Document 9.76.5 Change Request: Addendum to	Ecology survey of land included within	The bridge and the adjacent embankments have moderate-high potential to be used by Badgers, Breeding Birds and	An extended Phase 1 habitat survey was undertaken. This is presented in Application Document 9.76.5 Change	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
	Volume 6 Environmental Statement [CR1-055] Application Document 9.76.5.10 Change Request Appendix J: Change 4 Phase 1 Habitat Survey Results [CR1-065]	the Order Limits at Benhall Bridge	Bats. Surveys for these species should be carried out which will confirm presence/likely absence of these species and will help dictate any mitigation/licencing requirement that may be required. Results of these surveys should be sent to Suffolk Biodiversity Information Service (SBIS).	Request: Addendum to Volume 6 Environmental Statement [CR1-055] with the results presented in Application Document 9.76.5.10 Change Request Appendix J: Change 4 Phase 1 Habitat Survey Results [CR1-065] .	
3.1.3	Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk (Version 2 - change request) [CR1-047] Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan - Suffolk (Version 2 - change request) [CR1-041]	Maintenance of access	Access needs to be maintained for pedestrians and to private caravan site.	This has been considered in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] and the updated Application Document 7.5.9.1 Outline Public Rights of Way Management Plan - Suffolk (Version 2 - change request) [CR1-047] and Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan - Suffolk (Version 2 - change request) [CR1-047] submitted with the Change Request. Existing footways on Benhall Bridge would be temporarily closed during the proposed works on Benhall Bridge. For the temporary road closures required during the installation of the mini-bridge or the minor works to fix the bridge, local vehicular access will be maintained to properties and a shuttle/taxi service will be available to residents in Whitearch Park Residential Park Homes who do not have access to a vehicle.	Under discussion

3.2 River Fromus Crossing

Table 3.2 River Fromus Crossing

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.2.1	<p>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p>	<p>The impacts of the River Fromus crossing</p>	<p>The Council considers that the preferred access route, including the construction of a crossing over the River Fromus, provides a disproportionate solution to creating a permanent access to the converter station site. The proximity and proposed scale of the River Fromus crossing, its approaches and the resultant substantial and permanent loss of existing wooded vegetation would create significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist’s Church, Saxmundham (Grade II* Listed Building). The impacts of the works to install the bridge on the river corridor habitat will need assessing by an accredited BNG ecologist. Mitigation measures may need to be drawn up in terms of potential impacts on protected species. Surveys for Otter, Water Vole and Non-native Invasive Species (INNS) should be carried out within the proposed footprint of the bridge. Results of these surveys should be sent to SBIS.</p> <p>SCC not convinced that after 15 years the adverse effects of the crossing would reduce to ‘minor adverse’, especially if it is deemed necessary for the bridge to have a 6m clearance.</p> <p>SCC considers the Fromus Crossing should be temporary only, as permanent crossing is disproportionate and not necessary.</p> <p>SCC also notes lack of assessment of landscape and visual effects of bell mouth construction.</p> <p>SCC does not agree that existing road and railway are detracting features in the landscape which would reduce the negative impacts from the Fromus Crossing proposals.</p>	<p>The Applicant disagrees with the SCC view that the proposed access into the Saxmundham converter station site is disproportionate. In fact, the proposed access route off the B1121, which includes the bridge crossing of the River Fromus, is a robustly considered and appropriate means of taking construction and operational traffic into the Saxmundham converter station site. Nonetheless, the Applicant does recognise the concerns regarding the potential for effects on heritage and landscape receptors. Indeed, these considerations have influenced the location and design of the Fromus crossing, as well as the review of alternatives that contributed to the B1121 access being identified as the proposed access option.</p> <p>Built heritage</p> <p>Regarding heritage, 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 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>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 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				<p>A response in terms of landscape character is provided in the Landscape and Visual row below.</p> <p>Impacts of the River Fromus Bridge are already included in both the BNG assessment and in the ecological impact assessment for the DCO (Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP-047]) and has been informed by surveys undertaken by accredited surveyors for otter, water vole, and invasive species, along with other receptors. These have been discussed with and reviewed by Suffolk County Council and East Suffolk Council ecology teams. See response to 3.10.15 in regard to the accredited BNG ecologist point.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.2.2	<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 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]</p>	The impacts of the River Fromus crossing	The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as ‘important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.’	<p><u>Landscape and visual</u></p> <p>The detailed landscape and visual assessment appendices consider all aspects of the River Fromus bridge crossing, including the permanent loss of mature vegetation on the eastern edge of the River Fromus required to facilitate the construction of the bridge as well as the provision of native woodland mitigation planting which would replace the existing area of short rotation willow plantation (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 effects 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 Landscape Character Area (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>From a landscape character perspective, at construction there would be temporary effects on the setting of the Hurts Hall parkland landscape near to Hurts 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 on the approach to Saxmundham as identified in the Settlement Sensitivity Assessment.</p> <p>With reference to the setting of the crossing and the Suffolk Coastal Sensitivity Assessment (2018), Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				considers the relevant aspects from this published document in relation to LCA B4, including the important landscape as a rural approach to Saxmundham and strong river valley character. The landscape assessment is based on the entirety of baseline information reported, including those within the Suffolk Coastal Sensitivity Assessment (2018) (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]).	
3.2.3	<p>Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]</p> <p>Application Document 8.2 Option Selection and Design Evolution Report (October 2023) [APP-369]</p> <p>Application Document 5.1.7 Appendix F Targeted Consultation Part 1 of 2 [APP-313]</p> <p>Application Document 5.1.9 Appendix H Pre-submission Engagement Part 3 of 3 [APP-318]</p>	Assessment of alternative access options for the Saxmundham Converter Station site	The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the preferred access and considers that the Applicant has not conducted satisfactory engagement on this matter.	<p>Alternatives</p> <p>The Applicant initially considered three potential access routes, identifying the proposed ('western access') as the preferred option. Based on ongoing engagement with stakeholders, the Applicant then further considered a total of five alternative accesses as shown on Figure 6.4.1.3.20 Saxmundham Converter Station Access Options in 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>The five accesses considered comprised:</p> <ul style="list-style-type: none"> • An access from the west (from the B1121 south of Saxmundham) • An access from the north (from the B1121 north of Saxmundham) • An access from the south (from the A1094) • An access from the east (contiguous with the temporary cable haul road) • An access which utilised the proposed Sizewell Link Road (or B1122) <p>All options are in proximity to heritage assets, and all accesses require crossings of various types, with different access options interacting differently with roads, rail lines, watercourses, and/or public rights of way, and these all represent constraints which would require solutions.</p> <p>The proposed western access provides the shortest access from the A12, minimising the amount of construction traffic on the rest of the local road network. While all five options considered would introduce an off-highway access road into the landscape, the western access would require the shortest stretch, reducing the potential for construction risks, impacts, and delays. Using the shortest route from the A12 to site would reduce travel distance for every construction vehicle compared to the alternatives considered (by a considerable amount in the case of the longest alternative considered, the Sizewell Link Road or B1122 option), with associated construction phase and environmental benefits. While</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				<p>the proposed western access requires a crossing of the River Fromus, this has been subject to extensive technical and architectural review, and there are opportunities to avoid and reduce effects on heritage and landscape receptors through additional mitigation planting, as presented in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].</p> <p>Engagement</p> <p>The Applicant has conducted extensive engagement on potential alternative access routes.</p> <p>At non statutory consultation in 2022, access was identified as a constraint at the Saxmundham Converter Station site, noting that to avoid taking traffic through Saxmundham an off-highway access would be required which would potentially require a bridge crossing of the River Fromus. This is set out in Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]. At Statutory Consultation, the draft Order Limits were extended beyond the non-statutory consultation corridor to facilitate off-highway access options, as set out in Application Document 8.2 Option Selection and Design Evolution Report (October 2023) [APP-369]. Three alternative accesses were subject to project-wide public consultation at this stage.</p> <p>At Targeted Consultation in 2024, the Applicant identified the western access as the preferred option, and presented further micro-siting and design detail, along with additional Preliminary Environmental Information. Further Pre-submission Engagement on the micro-siting of the Fromus crossing was undertaken later in 2024 informed by further preliminary environmental information. The Targeted Consultation and Pre-submission Engagement documents are available in relevant appendices to the Consultation Report at Application Document 5.1.7 Appendix F Targeted Consultation Part 1 of 2 [APP-313] and Application Document 5.1.9 Appendix H Pre-submission Engagement Part 3 of 3 [APP-318].</p> <p>In parallel to the consultation undertaken throughout 2024, the Applicant maintained ongoing discussions with SCC (and other stakeholders) including on possible alternatives to the western access. Partly as a result of this engagement, the Applicant undertook the back check review of the access alternatives, including additional options arising from discussions with stakeholders. This is set out in Application Document 6.4.1.3 ES Figures Introduction Main Alternatives Considered [APP-206].</p>	
3.2.4	Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029] .	Design of the bridge	To make these proposals acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and	<p>Bridge design</p> <p>The Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from SCC and East Suffolk Council (ESC) regarding the emerging design</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
	Application Document 6.9 Water Framework Directive Assessment [APP-293]		harmonise with its setting. However, very little detail is provided by the Applicant in this regard.	<p>concepts for the bridge. This engagement has been ongoing since the pre-submission stage and has included engagement with the Suffolk Design Review Panel. The emerging design approach was presented in Application Document 7.11.1 (B) 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>In addition to the ongoing engagement with SCC (and 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 (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may contribute to the acceptability of a bridge structure that is less substantial than the ‘worst case’ that has informed the landscape and 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 confirming 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 renders of the design to 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. This document is itself an appendix to Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], which is secured by Requirement 5 of Application Document (E) draft Development Consent Order [CR1-027].</p>	
3.2.5	N/A	Construction traffic access routes for construction of River Fromus bridge and haul road	The Council requests clarity on the feasibility of constructing the River Fromus bridge and the haul road without substantial vehicle movements going through Saxmundham and using the B1119. It is not clear to the Council how the Applicant would access the east bank of the river without using these routes during construction of the bridge and haul road.	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	Under discussion

3.3 Saxmundham Converter Station

Table 3.3 Saxmundham Converter Station

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.3.1	N/A	Design Review Panel feedback	<p>The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. The Council acknowledges the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel (“DRP”) engagement provided through East Suffolk Council, which the Council attended as an observer.</p> <p>At the final stage of consultation, the Council requested that the DRP’s feedback was published by NGET before submission in the interests of transparency and accountability. This would have allowed affected host communities to understand the design approach to the development and how the design principles and masterplan of the site was being developed. It could also contribute to building public confidence in the project and safeguarding community wellbeing. The Council is disappointed that NGET did not take this recommendation forward.</p>	<p>The Applicant recognises the acknowledgment of the work undertaken to-date on the masterplan for the Saxmundham Converter Station. Indeed, substantial work has been undertaken and progress made on the development of a site-wide masterplan, which has influenced the development of the Proposed Project and represents a key part of the Applicant’s ongoing coordination with National Grid Ventures (NGV).</p> <p>This masterplan has been led by the Applicant, but with the involvement of various other stakeholders including NGV, ESC, SCC and, as acknowledged in the representation, the Suffolk DRP.</p> <p>Regarding the publication of the DRP feedback, the Applicant did not publish this in the way suggested by SCC because it was not considered appropriate or useful for this feedback to be published in isolation. Although regard was had to it by the Applicant, written feedback following meetings with the DRP was one of many stakeholder inputs that were being considered in the context of the emerging design concepts. This feedback on its own would not have contributed to the host communities’ understanding of the emerging proposals and indeed publishing additional documentation may be caused uncertainty at that time over whether further consultation was being undertaken (which it was not).</p> <p>Furthermore, the DRP Terms of Reference confirm the confidentiality of pre-application meetings and their output (stating that where proposals are at a pre-application stage, the report is not made public and is only shared with the planning authority, the applicant and design team, and any other stakeholder bodies that the Council has consulted on the project). It should be noted that SCC did not request that the feedback be made public ahead of the meetings.</p> <p>Notwithstanding this however, submission documents including Application Document 7.11.1 Design Approach Document – Suffolk [REP1A-029], Application Document 7.12.1. Design Principles – Suffolk [APP-366], Application Document 7.10 Coordination Document [APP-363], and Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] do provide comprehensive detail as to how the design of the Converter Station masterplan is developing. Within (section 6) of the abovementioned Design Approach Document, the Applicant provides a response table that presents the DRP feedback and</p>	Under discussion
3.3.2	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029].	Information provided in regard to the design of the converter station	Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.		Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				the Applicant’s design response to each of the points from the panel.	

3.4 Land for mitigation within the Order Limits

Table 3.4 Land for mitigation within the Order Limits

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.4.1	<p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 7.10 Coordination Document [APP-363].</p> <p>Application Document 9.76.2 (A) Change Request Report [CR1-052]</p>	<p>Reductions applied to the proposed order limits over the pre-application stage</p>	<p>The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant’s ability to provide effective mitigation, including landscape and visual mitigation and diversions of public rights of way.</p> <p>For example, the Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users (“NMUs”).</p> <p>The Council, therefore, considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits for reasons of effective landscape and visual mitigation and public amenity.</p> <p>SCC disagrees with the Applicant that the current DCO boundary includes sufficient land to fully mitigate adverse landscape and visual effects, including land to the north of converter station, the River Fromus Crossing and the proposed planting along the B1119.</p>	<p>Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for both landscape and ecological matters).</p> <p>In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. This is reflected in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] and Application Document 7.10 Coordination Document [APP-363].</p> <p>Regarding 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, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it was decided to broaden the strip of land south of the B1119, and this was included within the Change Request to amend the Order Limits [see Application Document 9.76.2 (A) Change Request Report [CR1-052]]. While this allows more space along this strip, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this. This route is proposed for a temporary public right of way diversion during the construction period. Additional opportunities for recreation and community benefits are not identified as essential mitigation in the ES. Whilst the</p>	Under discussion

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				<p>Applicant seeks to deliver enhancements and additional benefits where possible, this cannot be delivered on land to be compulsorily acquired as it would not meet the tests for compulsory acquisition if the land is not ‘necessary’ to develop a PRoW in this location in the long term. Therefore, whilst the Applicant would support a PRoW to the south of the B1119, it has not been considered possible to incorporate this into the DCO as it would require greater rights than are being sought at present over this land.</p> <p>Regarding the area along the River Fromus, the Applicant is indeed proposing landscaping along this watercourse. This will include new native woodland planting, replacing the plantation willow, to help screen sensitive receptors and soften views, but also to provide increased structure, ecological connectivity, and interest within the landscape. It will also include riparian enhancement to increase the ecological value of the river channel. This is reflected in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]. It is acknowledged that during earlier consultation stages, the area for planting was shown to extend further northwards along the River Fromus, although this was refined based on ongoing assessment to enclose only that mitigation that is necessary. Regarding the field to the north of the Converter Station, it should be noted that at Statutory Consultation in 2023, the Order Limits at the Saxmundham Converter Station site did indeed enclose the entire wider site between the proposed Converter Station and the B1119. A converter station location was shown indicatively, although the purpose of the wider Order Limits at that stage was to enclose similarly wide Limits of Deviation, which illustrated for consultation purposes how the Applicant may have built a converter station elsewhere within the site, depending on progress of the LionLink and Nautilus interconnector projects that were both being promoted by NGV at the time.</p> <p>At the Targeted Consultation in 2024, the Applicant made clear that it had refined its Order Limits at Saxmundham to remove areas that may be required only by other projects. This was because the strategy for coordinating was becoming clearer, including where within the wider site the Proposed Project works would be located. It was also because the Proposed Project (reflecting the normal approach to justifying powers sought via a development consent order) could not have maintained Order Limits that were larger than necessary. Therefore, the majority of the field to the north of the converter site, which is not required for permanent or construction-phase works or mitigation, has been removed from the Proposed Project.</p> <p>Regarding the area of land around the River Fromus, the land in the previous version of the Order Limits included land for</p>	

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				Biodiversity Net Gain (BNG). The Proposed Project consulted upon one way of delivering of BNG and included for the possibility of seeking compulsory acquisition powers for BNG in a similar way to the National Grid (Bramford to Twinstead) Development Consent Order. The strategy for the Proposed Project evolved through discussions with stakeholders and resulted in reviewing opportunities to collaborate with national level partners to deliver good BNG outcomes at a strategic level. The riparian planting proposed along the River Fromus for essential ecological mitigation remains within the Order Limits. On-site BNG would still be delivered where appropriate.	

3.5 Construction Core Working Hours

Table 3.5 Construction Core Working Hours

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.5.1	<p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p> <p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport Chapter 7 Traffic and Transport [APP-054]</p>	<p>Impact of construction hours, including on recreation and tourism</p>	<p>The potential for construction activities to take place seven days a week and on Bank Holidays would provide host communities with no respite from the impacts of the development activities associated with the Sea Link proposals, including disruption to local roads and Public Rights of Way (“PRoW”) used for recreational activity at times when they are most frequently used. In turn, this is likely to affect local tourism.</p> <p>The additional core working hours (7am – 5pm on Sunday and Bank Holidays) is likely to affect local tourism due to the impacts on the PRoW network and roads used for recreational purposes at times when they are most frequently used.</p> <p>SCC is unconvinced by the Applicant’s justification of its proposed core working hours, claiming the requirement for flexibility for its contractors to deliver the project in a timely manner.</p> <p>SCC has cited examples of other projects, either consented or awaiting decisions which fulfil the criteria as Critical National Priority infrastructure which have greater restrictions on their working hours than those proposed by the Applicant. Further detail on this can be found in para 14.59, SCC LIR [REP1-130]).</p> <p>SCC also notes that in the Applicant’s Description of Proposed Project document [REP1A-003] paragraph 4.6.2 states that the construction work is expected to be functionally complete by 2031. Therefore, this appears to contradict the Applicant’s justification of the working hours as being required to deliver the works by 2030.</p> <p>See [RR-5209], A1.4 of [REP2-062] and [REP1-130] for the Council’s detailed representations on this issue</p>	<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> <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 Sea Link, 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 Code of Construction Practice submitted at Deadline 3.</p> <p>Furthermore, the Applicant is working with the host authorities 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 or at all), and the National</p>	Under discussion

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				<p>Grid substation is therefore constructed under the Proposed Project consent rather than an SPR consent.</p> <p>The Applicant is considering the further comments on working hours from SCC and will update their position in the next version of the SoCG.</p> <p><u>Implications on tourism</u></p> <p>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. 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;	

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				<ul style="list-style-type: none"> 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>	
3.5.2	N/A	<p>Cumulative effect of construction hours on the area</p> <p>The impacts of the proposed core working hours should also be considered cumulatively with other NSIPs. The impacts in terms of geographical proximity or overlap of construction should be considered, in addition to repeated impacts on communities if projects are delivered sequentially, for example the cumulative loss of amenity and health benefits as PRow are closed, reopened, and closed again, which will discourage users.</p> <p>SCC has significant concerns regarding the impact of the proposed working hours on public health and wellbeing, as they would leave local communities with little respite from construction related noise, vibration, traffic and disruption.</p> <p>When considered in association with overlapping NSIPs in the region, there is likely to be a substantial impact on mental health and wellbeing.</p> <p>See [REP2-062] for further details.</p>		<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects (NSIPs). The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that the East Anglia ONE and TWO Offshore Windfarms have potential to result in cumulative effects upon four PRow. The Applicant will co-ordinate PRow closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 to be submitted during Examination. 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>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

3.6 Flood Risk at Friston Substation

Table 3.6 Flood Risk at Friston Substation

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.6.1	Application Document 6.8 Flood Risk Assessment [APP-292]	Historic Surface Water Flooding	Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors and the current Flood Risk Assessment does not adequately demonstrate this. The FRA now does reflect and acknowledge this.	<p>The Applicant anticipates that the drainage implemented at Friston (Kiln Lane) substation will be that currently being designed (with inputs from National Grid) as part of SPR’s East Anglia Two project. This is largely because it will be delivered pursuant to the SPR consent.</p> <p>However, the powers in the Proposed Project application would also allow the Applicant to deliver a comparable drainage strategy if its powers were used to deliver the Friston (Kiln Lane) substation (which they are not expected to be).</p>	Agreed
3.6.2	Application Document 6.8 Flood Risk Assessment [APP-292]	Drainage and mitigation	The Council as Lead Local Flood Authority (“LLFA”) is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of ScottishPower Renewables’ (“SPR’s”) East Anglia ONE North (“EA1N”) / East Anglia TWO (“EA2”) project. Sea Link’s Order Limits should provide sufficient space for drainage and mitigation.	The drainage strategy shown in the application represents an indicative situation whereby drainage is being implemented only for the Proposed Project. This reflects the use of ‘scenarios’ in the application for the Proposed Project, which have been used for assessment purposes and to make it clearer that that the delivery of Friston (Kiln Lane) substation under the Sea Link consent would only happen in one set of (highly unlikely) circumstances.	Under discussion
3.6.3	Application Document 6.8 Flood Risk Assessment [APP-292]	Historic Surface Water Flooding	The Environmental Statement (“ES”) should recognise historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.	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 (Section 4 of Application Document 6.8 Flood Risk Assessment [APP-292]).	Under discussion
3.6.4	Application Document 6.8 Flood Risk Assessment [APP-292] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Drainage and mitigation	The Council LLFA have also produced a Surface Water Study for the Friston catchment, which will assist the Applicant in assessing existing surface water flood risk in the area. This has been considered in the Applicant’s FRA.	<p>The indicative drainage strategy in the application only reflects the drainage requirements of the Proposed Project on its own, because in all other situations (i.e. the SPR elements of Friston Kiln Lane substation are developed, either before, in parallel with, or after the Proposed Project) then the drainage being currently being designed (with inputs from National Grid) as part of SPR’s East Anglia Two project is what will be implemented.</p> <p>In discussion with ESC, the Applicant has also committed to submitting a detailed Operational Drainage Management Plan, secured via DCO requirement, to provide further control and reassurance on operational drainage.</p> <p>The Proposed Project has made the following commitment W11 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				<p>which secures that ‘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.’</p>	
3.6.5	N/A	Kiln Lane Substation drainage strategy	For the Kiln Lane substation, in Scenario 2, the Applicant’s Surface Water Drainage Strategy should be aligned with the one pursuant to EA1N/EA2 OWFs.	The Applicant has committed to aligning this Drainage Strategy to SPRs.	Under discussion

3.7 Cumulative Effects

Table 3.7 Cumulative Effects

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.7.1	<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 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</p>	Available workforce	<p>Given the number of Nationally Significant Infrastructure Projects (“NSIPs”) and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important.</p> <p>The construction period for this project is predicted to coincide with those of Sizewell C Nuclear Power Station, NSIPs promoted by SPR, and (if consented) National Grid Ventures’ (“NGV’s”) LionLink project.</p> <p>It is anticipated that this would create significant cumulative pressure on the available workforce in the area and would impact tourism, both in terms of visitor perception and visitor numbers, on the Suffolk Coast. The Council considers it essential that the Applicant engages with local businesses and the host communities to discuss potential impacts and community benefits.</p>	<p>With respect to consideration of cumulative effects with other developments proposed in the area, including Sizewell C and LionLink, these have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate 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 recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified for socio-economics, recreation 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] 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>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</p>	Under discussion
3.7.2	N/A	Assessment of local labour force	<p>The Council disagrees with the Applicant’s assessment that the local labour force is of low sensitivity, as there are existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods. This could also potentially reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects are likely to be occurring in parallel.</p> <p>SCC considers that sensitivity should be rated medium-high, given the existing skills shortages identified in the recent regional and national workforce reports, including CITB Workforce Outlook 2025-2029 and SCC’s own Energy and Climate Adaptive Infrastructure Policy.</p> <p>SCC expects the Applicant to use SCC’s own criteria for assessing sensitivity of the local labour force, which includes availability by skill type, spare capacity in the local market, phase duration, training lead times and cumulative drawdowns across all local NSIPs.</p>	<p>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>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</p>	Under discussion

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3.7.3	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]</p>	Workforce displacement	<p>This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.</p> <p>SCC strongly disagrees with the Applicant's conclusion that cumulative labour supply will be sufficient within a 60-minute travel area. This assumption fails to address the cumulative impacts of multiple NSIPs on specialist skills, caused by overlapping construction timelines and competition for similar roles such as high voltage plant specialists, cable jointers, commissioning engineers, ecologists and heritage specialists. The cumulative demand will far exceed local availability, creating risks of displacement, wage inflation and labour churn that could negatively impact local businesses and service delivery.</p>	<p>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> <p>As 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] the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Additionally, within the 60 minute drive time there is a higher proportion of residents in skilled trade occupations compared to the regional and national averages. These characteristics suggest that the area has capacity to absorb the employment impacts of the Proposed Project without significant disruption or strain on the local economy. Therefore, classifying labour supply sensitivity as low is considered appropriate.</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. Table 13.43 of Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] 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>	Under discussion

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				<p>The Applicant will continue to employ a Community Relations Team throughout the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils and the local community.</p> <p>In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. National Grid welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, National Grid will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits.</p> <p>The Applicant is considering the further comments from SCC on the sensitivity of the local labour force and regarding cumulative labour supply and will update their position in the next version of the SoCG.</p>	
3.7.4	<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 9.50 Supplementary Environmental Information – Cumulative Vehicle Emissions Assessment [REP1-123]</p> <p>Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110]</p>	Impact on road network	<p>The Council is also concerned about cumulative impacts on the road network and expects the proposals to contribute to significant effects with regards to traffic on the routes leading to, and in proximity to, the Suffolk Coast (and subsequent impacts on air quality, noise, and vibration), local housing, services, and labour supply. For example, use of the preferred access route to the converter station site via the B1121 could significantly impact communities to the south of Saxmundham, including Benhall and Sternfield, that rely on the town for shops and services.</p> <p>There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this.</p> <p>The Council has set out its concerns regarding the Applicant’s cumulative effects assessment in chapter 11 of its LIR [REP1-130] and does not consider the technical note on this assessment submitted prior to deadline 1 to address these concerns as set out in the Council’s response [REP2-062].</p>	<p>Potential cumulative effects with other developments proposed in the area have been assessed following cumulative effects assessment guidance published by the Planning Inspectorate and are reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This assessment has considered traffic, air quality, noise, and socioeconomic factors. Further assessment of cumulative vehicle emissions has been undertaken and is reported in Application Document 9.50 Supplementary Environmental Information – Cumulative Vehicle Emissions Assessment [REP1-123].</p> <p>Since the submission of the DCO application, a further review of the feedback received, and issues raised on the cumulative assessment has been carried out. A Highways focussed meeting was held with SCC and ESC on 6 August 2025 to provide the Local Authorities with further details on the methodology and findings of the cumulative assessment work, including with respect to the anticipated durations of any potential cumulative effects. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110] provides further details on the methodology and findings of the cumulative assessment work, in cognisance of various construction programmes and potential overlaps of different projects, to further inform</p>	Under discussion

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				<p>and provide reassurance on the findings including with respect to mitigation.</p> <p>A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considered other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments.</p> <p>As set out above, a further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details that reinforce these conclusions. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110] provides further information on the cumulative assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. The initial findings were presented to SCC during a Highways focussed meeting held on 6 August 2025. A summary of these, as they relate to the B1121 Main Road, is provided below.</p> <p>The B1121 Main Road to the south of Saxmundham will be used by the Proposed Project, Sizewell C and LionLink. The cumulative assessment identified that there could be the potential for significant cumulative effects at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and Sizewell C. In addition, there could be the potential for significant cumulative effects on the B1121 Main Road to the east of the A12 and at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and LionLink.</p> <p>To provide further clarity on the findings, a Minor / Moderate cumulative effect could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the Proposed Project and other projects (such as Sizewell C and LionLink) overlapped precisely, otherwise the duration of any cumulative effects will be shorter. A Negligible cumulative effect (Negligible for the Proposed Project</p>	

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				<p>coupled with Minor for the other projects) will occur for the remainder of the 60-month Sea Link construction programme. There would be no potential for a significant cumulative effect based on average (rather than peak) construction traffic levels for the Proposed Project, given this would result in a Negligible effect for the Proposed Project. In view of this, it is considered that the cumulative effect is more likely to be Minor and not significant overall, with a Negligible cumulative effect being experienced for the majority of the construction programme.</p> <p>This additional information presented above and during the thematic meeting with SCC on 6 August 2025 is considered to further validate the findings reported in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], that significant cumulative traffic effects, as a result of the Proposed Project and other projects, are unlikely to occur.</p> <p>While the Authority has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other developments have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each project. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in ongoing dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated. It should also be re-emphasised that worst case peak levels of construction activity have been considered and the duration of these peaks will be for short periods.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.7.5	Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]	Sequential impacts	The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users, in addition to local residents and	The Applicant notes the Council's concerns regarding sequential cumulative impacts arising from the Proposed Project. The Applicant has undertaken a comprehensive intra and interproject cumulative effects assessment in	Under discussion

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	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-48]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>		<p>businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.</p> <p>The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, may not fully capture the full extent of how PRow and the behaviour of users will be impacted. As a result, the approach diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for that receptor, then they could be significant, as recognised in the Planning Inspectorate’s Advice Note 9. The Council requested that PRow should be treated as a separate topic in the ES, but this has not been taken forward.</p>	<p>accordance with the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment.</p> <p>Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059] assesses the potential significant cumulative effects that may arise when multiple aspects of the Proposed Project impact a single receptor worsening the resultant effect. The potential for intra-project effects have been identified on a number of groups including recreational resources and communities and PRow. There is potential for a significant intra-project cumulative effect to occur during construction and decommissioning on PRow users of Footpaths 260/017/0, 491/005/0, 491/006/0 and Bridleway 491/010/0. This is due to the combination of moderate adverse effects on user experience and local travel patterns identified in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005], moderate to major adverse effects on visual amenity identified in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-48], and minor adverse traffic and transport effects identified in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. Similarly, there is potential for a significant intra-project cumulative effect to occur during construction and decommissioning on PRow users of Bridleway 354/002/0. This is due to minor adverse effects on visual amenity identified in Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-48], moderate adverse effects on user experience and local travel patterns identified in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005], and minor adverse traffic and transport effects identified in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054].</p> <p>No significant intra-project cumulative effects have been identified on other recreational receptors and communities as none of the effects during construction arising from landscape and visual, health and wellbeing, noise and socio-economics, when combined, are considered to result in additional or exacerbated effects on the receptors that are greater than the individual effects already defined upon recreational receptors and communities.</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] reports the cumulative impacts of the Proposed Project in</p>	

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				<p>addition to other projects on shared receptors. It includes a sequential cumulative visual assessment for visual receptors, as reported in Table 13.36. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore Windfarms have potential to result in cumulative effects upon four PRow. The Applicant will co-ordinate PRow closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative projects in aggregation with the Proposed Project, and therefore no additional mitigation will be required.</p> <p>In regards to point 34, the Applicant is confident that the structure of the ES as submitted with the DCO application allows for a full assessment of all potential impacts on PRow where there is the potential for significant environmental effects. It is not conventional practice for an ES to have a standalone PRow assessment reported within its own ES topic chapter, nor is the Applicant aware of any best practice guidance which recommends that a separate PRow ES chapter should be produced. It is noted that most other local consented DCO schemes in Suffolk such as East Anglia ONE, East Anglia TWO, East Anglia ONE North and Bramford to Twinstead Reinforcement, also adopted a similar approach to the Proposed Project in their EIAs. Furthermore, other recent EIAs submitted nationally for consented DCO schemes adopt the same approach as the Proposed Project with no separate PRow ES chapter, including East Yorkshire Solar Farm, Viking Carbon Capture and Storage (CCS) Pipeline and the Tillbridge Solar Project to name a few.</p> <p>In terms of guidance, the Design Manual for Roads and Bridges (DMRB) sets out specific environmental topic assessment methodologies, and it is worth noting that there is not a separate one for considering PRow. Instead, consideration of PRowS are an integral part of the other topic assessments, such as Landscape and Visual Effects (LA 107) (Standards for Highways, 2020) and Population and Human Health (LA 112) (Standards for Highways, 2020). ISEP (formally IEMA) guidance on ‘Environmental Assessment of Traffic and Movement’</p>	

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				<p>(July 2023) (ISEP, 2023), provides practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of statutory EIAs, which traffic and transport assessments follow. PRow users are considered as a particular receptor group to consider within the traffic and transport assessment, which addresses aspects such as pedestrian delay (including all non-motorised users), non-motorised user amenity and fear and intimidation.</p> <p>It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a separate PRow ES chapter it would risk double counting of effects already being reported somewhere else in the ES. SCC state their concern is that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. This is exactly the point of the intra-project effects assessment, which has considered the combined effects on PRow and their users, that have been identified across the various topic chapters. This intra-project (or in-combination) assessment is presented in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]. This intra-project cumulative effects assessment found that users of only one PRow were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns.</p> <p>A Technical Note will be submitted during Examination to provide further details on the approach taken.</p>	
3.7.6	<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</p> <p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p>	Impact on PRow	<p>The Council is concerned about the cumulative impact of this proposal with the other existing energy projects consented and proposed in this area on the PRow network, where the lack of a single assessment approach for public rights of way, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRow network to the north of Friston where there will be repeated temporary closures of PRow that could overlap with temporary closures on the same PRow required for the Sea Link project.</p> <p>The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or</p>	<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. The assessment considers cumulative socio-economic impacts on PRow and recreational routes within a 500 m study area from the Proposed Project's order limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits.</p> <p>As set out in Table 13.43, the assessment of total inter-project cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore have potential to result in cumulative effects upon four PRow. The Applicant will co-ordinate</p>	Under discussion

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	Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]		<p>concurrent projects. The impact of temporary closures of PRow should not be underestimated, as their value for local amenity could be severely reduced or removed during works.</p> <p>Although SCC supports greater coordination between NSIPs to minimise negative impacts on PRow, there are concerns regarding the lack of detail from the Applicant on how these measures will ensure cumulative impacts will be adequately mitigated.</p>	<p>PRow closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3. 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>The Applicant recognises the importance of local amenity and access to PRow. In response to this concern, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses the likely significant effects on amenity of PRow users, drawing on assessment from Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] and Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]. The cumulative impact is also assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]. No significant adverse effects are identified with regards to human health and wellbeing.</p> <p>The Applicant has endeavoured to reduce impacts on PRow wherever possible. An Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] has been prepared as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRow diversions, closures and management during the construction, operation and decommissioning phases. PRow closures and diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.7.7	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Inter-Project Cumulative Effects [APP-060] Application Document 7.10 Coordination Document [APP-363]	Phasing	<p>Given that it is likely that the construction periods for Sea Link and LionLink will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at</p>	<p>The LionLink project is not currently at a design maturity stage where the alignment of works can be committed to. Neither the Proposed Project nor LionLink projects have received development consent and as such are not in a position to detail their construction programmes to create aligned phasing. As the need case for both projects is</p>	Under discussion

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			Saxmundham and the substation at Friston for both Sea Link and LionLink are laid at the same time will help to reduce the cumulative impacts on the local community and environment.	<p>different, with the Proposed Project being required to improve the capacity of the electricity transmission network, and as the Proposed Project is being delivered under NGETs licence agreement, the Applicant is unable to commit to phasing works with another project that could, if delayed, significantly delay the delivery of the Proposed Project.</p> <p>The Applicant has and will continue to liaise with NGV to look for opportunities to coordinate works such that they minimise the impact on local communities and the environment. LionLink is one of the projects considered by the Proposed Project for cumulative effects. Reference can be made to Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Inter-Project Cumulative Effects [APP-060] for further details of the assessment. As part of the DCO submission, the Applicant has produced a report on coordination which covers how it approached coordination with other projects with the aim of reducing the impact on the environment and local communities, see Application Document 7.10 Coordination Document [APP-363].</p>	
3.7.8	Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091] Application Document 9.35.1 Applicant's Comments on Local Impact Report [REP2-026] from Suffolk County Council	Cumulative Schemes – methodology	The Council has critically reviewed the Applicant’s cumulative effects assessments and has set out their shortcomings throughout its Local Impact Report and other representations. Several of these points likely have implications for the methodology used.	<p>National Grid presented the cumulative assessment methodology on 20 November 2024, and this was agreed with the Consultee.</p> <p>The cumulative effects assessment methodology is set out in Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091].</p> <p>The Applicant responses to SCC comments on the CEA can be found in Application Document 9.35.1 Applicant's Comments on Local Impact Report [REP2-026] from Suffolk County Council.</p>	Under discussion
3.7.9	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	The cumulative effects short list should be reviewed and updated should new information become available about upcoming projects which could interact with the Applicant’s project.	<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

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.7.10	<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 6.2.5.2 (B) Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [REP1A-011]</p> <p>Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]</p>	<p>Conclusions of the Cumulative Effects Assessments</p>	<p>The Consultee is yet to agree with the conclusions set out in the Cumulative Effects Assessment (CEA).</p> <p>The Consultee has reviewed these conclusions in its LIR.</p>	<p>The conclusions of the Cumulative Effects assessment are presented within 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 and Application Document 6.2.5.2 (B) Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [REP1A-011].</p> <p>The Applicant responses to SCC comments on the conclusions of the CEA can be found in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	Under discussion

3.8 Co-location and Coordination with other projects

Table 3.8 Co-location and Coordination with other projects

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.8.1	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	<p>The Council considers that project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate, co-locate, and consolidate infrastructure, both their own and other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment.</p> <p>Throughout the various consultation stages, the Council pressed the case that Sea Link should fully coordinate consenting, construction, and operation with the LionLink project, and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.</p>	<p>The Applicant agrees with SCC that developers should seek to coordinate, co-locate, and consolidate infrastructure wherever possible. Indeed, coordination with other projects and other promoters has been ongoing for several years and has had a profound influence on the development of the Proposed Project. This is set out in 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.</p> <p>This includes:</p> <ol style="list-style-type: none">1. Coordination in the approach to consent, which included ensuring that the consents strategy for the Proposed Project is compatible with the emerging strategies for other projects, to allow coexistence and to allow the other forms of coordination to be considered in an ongoing way. This approach has helped to inform the Proposed Project's interaction with the extant SPR DCOs for EA1N and EA2, and with the emerging approaches being adopted by the LionLink (and formerly Nautilus) interconnectors.2. Coordination in the approach to project development, which has resulted in a number of key outcomes. These include the identification of Friston Substation as the point of network connection, adopting the principles of co-location when identifying potential converter station and cable infrastructure locations, embedding design flexibility of various forms to accommodate the potential future design evolution of other projects, and the development of a site-wide coordinated masterplan at the Saxmundham converter station site. The masterplan is presented in Appendix A: NGV Coordination Suffolk Masterplan within Application Document 7.10 Coordination Document [APP-363].3. Coordination in project delivery. This is a key ongoing area of coordination, facilitated by the approaches described above. There are various ways that benefits could be delivered, depending on how future projects are developed and along what timescales. This may involve elements of shared construction facilities to reduce land-take, reduce combined construction timescales, and reduce other environmental impacts. It may involve a joined-up approach to detailed landscaping and drainage design. It may even involve	Under discussion
3.8.2	Application Document 7.10 Coordination Document [APP-363] Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]	Engagement and coordination with other NSIP projects in the area	<p>The Council considers it essential for NGET to engage in discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated heavy goods vehicle ("HGV") movements, workforce numbers and traffic management on the highways network. Commonality could be found in sharing Delivery Management Systems or platforms for permitting highway works.</p>		Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
				<p>co-delivery of elements of other projects' infrastructure. The extent to which these can and will be delivered depends on various factors including the design and programme of other projects, and the powers in their respective consents.</p> <p>These approaches to coordination provide opportunities to minimise environmental and local community effects of the Proposed Project in combination with other projects, in accordance with coordination policies set out in the NPSs for Energy. The Applicant remains committed to continuing engagement with all the projects identified to secure these coordination benefits and to also explore further opportunities for coordination where they arise.</p> <p>Regarding the reference in the representation to National Grid PLC influencing the strategies for both the Proposed Project and LionLink, it must be noted that the Applicant (National Grid Electricity Transmission) and NGV are legally separate entities. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered.</p> <p>It is important to note however that although the consents strategies are coordinated to ensure compatibility and mutual deliverability, the consenting of the Proposed Project and LionLink projects must nonetheless be undertaken independently. Notwithstanding that they are completely different and separate projects, the importance of delivering the Proposed Project means that the Applicant fundamentally cannot delay the Proposed Project to align with another over which it has no control. This would be an unacceptable risk to the Applicant's obligations under its ASTI licence to deliver the Proposed Project, and to the Government objectives to delivery clean power by 2030. The scale of this risk is demonstrated by the current temporal difference between the two projects, with LionLink currently over two years behind the Proposed Project.</p> <p>Furthermore, a full inter-project and intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].</p>	

3.9 Landscape and Visual

Table 3.9 Landscape and Visual

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.9.1	<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 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]</p>	Effects on designated and defined landscapes	<p>The proposed landfall site is located between Aldeburgh and Thorpeness, within the highly constrained Suffolk Coast & Heaths Area of Outstanding Natural Beauty ("SCHAONB") and the Suffolk Heritage Coast.</p> <p>It is close to the Sandlings Special Protection Area ("SPA") and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest ("SSSI"). The site also has high archaeological potential.</p> <p>In terms of tourism, the site is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.</p> <p>SCC has set out its doubts over the adequacy of the Applicant's assessment of effects on the National Landscape in paragraphs 5.46 to 5.58 of its LIR [REP1-130]</p>	<p>The location of the landfall within the Suffolk & Essex Coast & 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.</p> <p>The Applicant has set out their response to the comments from SCC on the adequacy of the assessment in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	Under discussion
3.9.2	N/A	Potential adverse effects on landscape and visual mitigation measures of other projects	<p>It is important to note that the alternating current ("AC") cable corridor route is likely to undermine the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N and EA2.</p> <p>The Council therefore considers it essential for the Applicant to use horizontal directional drilling ("HDD") to minimise adverse impacts on the landscape mitigation package secured under the SPR DCOs.</p> <p>SCC recognises that the Applicant will submit a landscape plan for the substation site once SPR has</p>	The Proposed Project will not undermine the effectiveness of the landscape mitigation set out for the consented EA1N and EA2 DCOs. The approved outline landscaping for the EA1N and EA2 projects is set out in the Outline Landscape and Ecological Management Strategy (Version 08), 31 January 2022 (OLEMS). This outline strategy, which is reflective and proportionate to the findings of the EIA presented in the EA1N and EA2 project ES's, comprises reinforcement of historic hedgerows and small woodland block planting to provide screening from isolated properties and from users of the PRow network,	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			submitted its detailed landscape plan for approval and will update its position accordingly.	<p>while providing a layered screening approach. It does not sterilise land for potential future development associated with the National Grid substation.</p> <p>The Applicant, in collaboration with SPR, is confident that detailed landscaping designs that accord with this outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables. The Order Limits and Limits of Deviation for the HVAC cables for the Proposed Project have deliberately been widened to provide significant flexibility to minimise any impacts on future planting. The Applicant is working closely with SPR to understand the interactions with emerging detailed designs and minimise these where possible.</p> <p>When SPR has submitted its detailed landscape masterplan, the Applicant will submit a plan demonstrating how the function of the landscaping can be retained with the cables in situ, including both the HVAC and HVDC cables. This has not been possible to date given that the landscaping plan for EA2 has not been finalised or released into the public domain. However, the Applicant is confident that interactions with areas of the EA1N and EA2 planting will not undermine the effectiveness of the landscape mitigation, and that where necessary minor revisions to the mitigation plan can be agreed.</p>	
3.9.3	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Good design	The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. The Council welcomes the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel engagement provided through East Suffolk Council which Suffolk County Council attended as an observer.	The outline Landscape and Ecology Management Plan (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]) within section 7.6 'Co-ordination with National Grid Ventures Projects', sets out how the landscape and ecological proposals for the Saxmundham Converter Station have been developed to be complementary to the potential NGV projects. It also commits to the detailed LEMP delivering, amongst, other things ' <i>a coordinated landscape design for the wider site which, as far as is reasonably practicable, enables a cohesive landscape, ecological and recreational framework to be achieved.</i> '	Under discussion

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3.9.4	<p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</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 Written representations (WR) and summaries [REP1-199]</p> <p>Application Document 6.2.2.3 Part 2 Suffolk ES Chapter 3 Cultural Heritage [APP-050]</p> <p>Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]</p> <p>Application Document Design Approach Document – Suffolk [REP1A-029]</p>	Converter Station site	<p>The land to the north and east of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part. The current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119.</p> <p>There are a number of listed buildings within the vicinity of the converter station site. Hill Farmhouse is Grade II listed, would potentially experience a detrimental impact to its setting. SCC notes that the Applicant has assessed the impacts on Hill Farmhouse and defers to the statutory authorities on this matter.</p> <p>Saxmundham Footpaths 5 and 6 cross the site and would require diversion.</p> <p>The Council considers that the development and design of the Converter Station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.</p> <p>The strip of land along of the B1119 currently included in the proposed DCO limits does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham. The Council will comment on the change request on the Order Limits in this area according to the examination timetable.</p> <p>Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.</p> <p>The Applicant added additional potential work compound areas around the proposed Saxmundham Converter Station site to the DCO limits during the pre-engagement consultation that ended in January 2025. The Council considers that the added flexibility sought by the</p>	<p>The baseline of the Saxmundham Converter Station site is noted and acknowledged within the landscape and visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]). The historic landscape features on the converter station site have informed the outline landscape mitigation proposals (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). 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. At year 15 of operation and maintenance, there would be nine representative viewpoints which would experience significantly adverse residual effects arising from the Suffolk Onshore Scheme (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Such viewpoints 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>The Application has been informed by Historic England and East Suffolk Council that the listed status of Wood Farm was removed after the DCO was submitted Application Document Written representations (WR) and summaries [REP1-199] from Historic England. As such, impacts are no longer predicted on Wood Farm.</p> <p>Hill Farmhouse (NHLE 1231296) is assessed in Application Document 6.2.2.3 Part 2 Suffolk ES Chapter 3 Cultural Heritage [APP-050]. The assessment noted that Hill Farmhouse was surrounded by woodland which resulted in an intimate setting, and long-range views did not contribute to its experience or heritage significance. Saxmundham Converter Station would not be perceptible from the house and its setting and heritage significance would not experience change. As such, the assessment concluded there would be no impact and no effect.</p>	Under discussion

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			Applicant results in greater vagueness of the scheme and greater uncertainty.	<p>The permanent PRoW diversion across the Saxmundham Converter Station site is acknowledged and is shown on Figure 1 Saxmundham Converter Station Outline Landscape Mitigation (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). This provides a new circular route on the Saxmundham Converter Station site and connects into the existing PRoW network to the east and south.</p> <p>The current proposals do not include additional opportunities for recreation as they are not identified as essential mitigation in the ES and therefore powers are not sought for this.</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 hedgerow trees. However, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with this proposed change to the Order Limits. The Applicant has recently submitted to the ExA a notification of this proposed change (Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]) to the ExA. On 6 December 2025 this Change Request was accepted into the examination.</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 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]).</p>	

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				<p>As set out in the Applicant's Application Document Design Approach Document – Suffolk [REP1A-029] the site layout for Suffolk Converter Station, including the Compound Area, has been designed to retain flexibility to allow for designs to accommodate the specific requirements of the preferred suppliers equipment and building layouts. Part 3.1 Converter Station confirms that: <i>‘depending on the selected equipment provider, and subject to detailed design, the disposition of these area types within the site and the exact length and width of the compound may vary.’</i></p> <p>The Applicant has assessed the Proposed Project using the Rochdale Envelope. This is a well established means of assessing the worst case scenario where a project has a degree of flexibility, and there is nothing unusual in this approach.</p>	
3.9.5	<p>Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]</p> <p>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</p> <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>	River Fromus crossing	<p>Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment.</p> <p>It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'</p> <p>The Council also considers the proposals will also have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on</p>	<p>The Applicant disagrees with the SCC view that the proposed access into the Saxmundham converter station site is disproportionate. The Applicant nonetheless recognises that there are sensitive receptors in the vicinity of the proposed crossing and acknowledges that there are concerns regarding how the Proposed Project may affect them.</p> <p>The various detailed matters identified in the representation are addressed below, in order to provide some clarification regarding the likely significant effects of the Proposed Project, and the Fromus crossing in particular (to the extent that this element can be isolated from the wider proposals).</p> <p>Built Heritage</p> <p>Regarding heritage, 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 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>	Under discussion

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			<p>important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).</p> <p>The Council welcomes the change in layout of the Fromus crossing to avoid veteran trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, the Church of St John the Baptist, and Hurts Hall. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality, and harmonise with its setting; however, very little is provided by the Applicant in this regard.</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>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 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].</p> <p>Application Document 9.44 St John's Church Grade II* Listed Building [REP1-118], reports on an additional assessment of the Proposed Project on the Grade II* listed Church of St John the Baptist as an individual heritage asset, separate to the assessment of the asset as within Saxmundham Conservation Area. This concludes the Proposed Project would have a '<i>minor adverse</i>' (not significant) effect at year 1, reduced to '<i>neutral</i>' (not significant) at year 15 once additional mitigation planting has established. This residual effect would result in no harm to the heritage asset.</p> <p><u>Landscape and Visual</u></p> <p>Regarding landscape, the detailed landscape and visual assessment appendices consider the River Fromus bridge crossing, including the permanent loss of mature vegetation on the eastern edge of the River Fromus required to facilitate the construction of the bridge as well as the provision</p>	

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				<p>of native woodland mitigation planting which would replace the existing area of short rotation willow plantation (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>From a landscape character perspective, at construction there would be effects on the setting of the Hurts Hall parkland landscape near to Hurts 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. Further information on the setting of Hurts Hall and St John the Baptist's Church, Saxmundham and an assessment of the impact of the Proposed Project can be found in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].</p> <p>The Layers is an open area to the west of the B1121. Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] acknowledges the importance of views from The Layers towards Hurts Hall and assessed that the presence of Saxmundham Converter Station and the River Fromus bridge crossing would represent a noticeable change to the experience and appreciation of Hurts Hall within its associated</p>	

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				<p>parkland. However, additional mitigation measures detailed in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] have been designed to minimise change to the setting of the heritage assets, especially in views from the west and from The Layers.</p> <p>With reference to the setting of the crossing and the Suffolk Coastal Sensitivity Assessment (2018), Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] considers the relevant aspects from this published document in relation to LCA B4, including the important landscape as a rural approach to Saxmundham and strong river valley character. The landscape assessment is based on the entirety of baseline information reported, including those within the Suffolk Coastal Sensitivity Assessment (2018) (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]).</p> <p>With regard to ‘Important Local Views’, as identified within the Saxmundham Neighbourhood Plan (2023), this is identified for Representative Viewpoints 2, 4 and 20, which informs the visual value of such receptors Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]). Such views would experience residual significant adverse effects at operation and maintenance year 15 as they are within the localised landscape around Saxmundham Converter Station or to the west of the River Fromus bridge crossing.</p> <p><u>Arboriculture</u></p> <p>The change to the River Fromus bridge crossing design to avoid veteran trees is noted and 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]).</p> <p><u>Bridge design</u></p> <p>The Applicant continues to maintain productive engagement with relevant historic environment and landscape officers from SCC and East Suffolk Council regarding the emerging design concepts</p>	

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				<p>for the bridge. This engagement has been ongoing since the pre-submission stage and has included engagement with the Suffolk Design Review Panel. The emerging design approach was presented in 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>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 (see Application Document 6.9 Water Framework Directive Assessment [APP-293]), the outcome of these discussions with the EA may contribute to the acceptability of a bridge structure that is less substantial than the 'worst case' that has informed the landscape and 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 confirming 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 renders of the design to 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. This document is itself an appendix to Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], which is secured by Requirement 5 of Application Document 3.1 (E) draft Development Consent Order [CR1-027].</p>	

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3.9.6	<p>Application Document 7.1 (C) Planning Statement [AS-057]</p> <p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]</p> <p>Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]</p> <p>Application Document 7.10 Coordination Document [APP-363]</p> <p>Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]</p>	Landscape and visual mitigation	<p>The proposals are located in highly constrained landscapes and the application of Good Design principles as well as the full Mitigation Hierarchy (including compensation/offsetting for adverse effects that cannot be mitigated) will be essential.</p> <p>While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Council considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate landscape and visual impacts and effects of which there will be significant residual effects.</p> <p>The Council is concerned that, through removing areas from the DCO limits that were previously included for mitigation, comprehensive landscape, and visual mitigation commensurate with the proposals is being made more difficult, if not impossible, to deliver. The Council, therefore, considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits, for reasons of effective landscape and visual mitigation and public amenity.</p> <p>The Consultee issued comments to National Grid on 30 January 2025. This includes reference to planting and public access along the B1119 being too narrow and insufficient PRow connectivity.</p> <p>The strip of land along the B1119 currently included in the proposed DCO limits does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide for example, a circular route from Saxmundham, preferably in the form of a bridleway.</p>	<p>The importance of 'good design' and the mitigation hierarchy has been inherent in the iterative process of design and assessment throughout the Pre-Application process. Application Document 7.1 (C) Planning Statement [AS-057] in section 6.3 sets out how the Suffolk Onshore Scheme complies with policy relating to good design. Regarding landscape compensation, the Applicant's position is set out below at section 3.9.20.</p> <p>The embedded mitigation is set out in Section 1.7 'Proposed Project Design and Embedded Mitigation' within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and the outline Landscape and Ecology Management Plan details the proposed outline landscape mitigation plans (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). It is not considered that there are areas of off-site landscape planting that would be appropriate in reducing the residual significant adverse effects arising from the Proposed Project.</p> <p>Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for both landscape and ecological matters). The field to the north of the Saxmundham Converter Station was removed as the coordination strategy with LionLink became clearer. In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. Refer to Application Document 7.10 Coordination Document [APP-363]. Opportunities remain to be considered for providing permissive access within the mitigation landscape proposals surrounding the Saxmundham Converter Station site.</p>	Under discussion

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				<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, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with the proposed change to the Order Limits. The Applicant submitted a notification of this proposed change (Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]) to the ExA and has recently submitted a Change Request. On 6 December 2025 this Change Request was accepted into the examination. While this allows more space along this strip, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this.</p> <p>This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] within the landscape design principles section and Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]).</p> <p>Regarding the area of land around the River Fromus, the land in the previous version of the Order Limits included land for BNG. The Proposed Project consulted upon one way of delivering of BNG and included for the possibility of a Bramford to Twinstead style land acquisition. The strategy for the Proposed Project evolved through discussions with stakeholders and resulted in reviewing opportunities to collaborate with national level partners to deliver good outcomes at a strategic level. The riparian planting proposed along the River Fromus for ecological mitigation remains within the Order Limits. On-site BNG would still be delivered where appropriate.</p>	

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3.9.7	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]	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>Landscape character receptors – SCC confirmed it defers this to ESC.</p> <p>Seascape Character receptors - the Consultee stated that they have no objections in email sent on 18 June 2024 and confirmed this via email on 30 January 2025.</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
3.9.8	Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300] Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	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. Email sent on 18 June 2024 confirmed the Consultee was not in agreement of the approach presented on 22 April 2024.</p> <p>On 18 June 2024, the Consultee requested 10 additional viewpoint locations. This was discussed during the 25 June 2024 thematic meeting and National Grid responded to the requests via email on 15 July 2024.</p> <p>A meeting was held on 10 September 2024 between the Parties to discuss the requested additions.</p> <p>The Council has commented on the additional viewpoint visualisations produced by the Applicant in tables B8, B9 and B10 of [REP2-062] and awaits a response from the Applicant to address those queries.</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 SCC landscape agreed with the Applicant to disregard 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 landscape, inspite of the Applicant's reasoning.</p> <p>However, photography from three of the five outstanding viewpoints, specifically, those viewpoints located within the landscape to the west of the proposed River Fromus crossing (Viewpoints A, B and C), have since been captured and are presented within Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]. This document sets out at 3.1.1 that "<i>the additional visualisations (Viewpoints A, B, and C) demonstrate that the original representative viewpoints (Viewpoints 2 and 20) used to inform the Landscape and Visual Impact Assessment (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) provided robust locations for representative viewpoints</i>" and at 3.1.5 that "<i>the updated visualisations further reinforce the conclusions in the Environmental Statement and demonstrate that these conclusions are unlikely to change as a result of minor changes as the detailed design progresses</i>".</p>	Under discussion

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				The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	
3.9.9	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 final 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
3.9.10	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	Study Area	Following discussions and correspondence during 2024 the Consultee agreed the study area via email on 30 January 2025.	The Study Area is set out within 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 proposed landfall and HVDC and HVAC cable corridors.	Agreed
3.9.11	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]	LVIA methodology	The Consultee emailed on 18 June 2024 with comments on the methodology, including comments on the terminology used for moderate and major adverse effects. The most recent information was sent to the Consultee by National Grid in January 2025 for review and comment. The Consultee responded on 30 January 2025 with comments which are to be discussed during examination	<p>The LVIA methodology is set out within Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095], 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 presented in the ES is considered to be appropriate with guidance and typical approaches and referred to descriptive text in accompanying appendices.</p> <p>The Application Document Local Impact Report (LIR) from any local authorities [REP1-130] from Suffolk County Council sets out at 5.106 that the photomontage methodology (including anticipated growth rates) is acceptable and at 5.111 that whilst SCC landscape is not fully aligned with the LVIA methodology approach, that the examination should focus on further shaping the design and mitigation of adverse effects of the scheme and securing good outcomes for Suffolk.</p>	Under discussion

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				The Applicant acknowledges the comments that were submitted on 30 January 2025 and would request the Consultee to review in light of now receiving the Environmental Statement and submitting their LIR to set out any outstanding matters to be discussed.	
3.9.12	Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]	PEIR Photomontage methodology	The Consultee agreed the methodology used in the PEIR via email on 30 January 2025.	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
3.9.13	Application Document 7.11.1 (B) 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 commented on the design principles and landscape strategy set out in the design documents, landscape and visual ES chapter and Outline LEMP following the submission of the DCO Application in chapter 5 of its LIR [REP1-130]. The Council notes that questions on this matter have been directed to the Council, the Applicant and other local authorities in ExQ1. The Council will respond accordingly at Deadline 3.</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] , Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] .	Under discussion
3.9.14	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]	Outline Landscape and Ecology Management Plan	<p>The Consultee is aware of the progress on the oLEMP, and updates have been covered in thematic meetings. The Consultee confirmed that they have no objections to having two separate oLEMPs, one for Suffolk and one for Kent. The Consultee issued comments on the oLEMP structure via email on 30 January 2025. This relates to construction mitigation, aftercare timings and the separation of different disciplines within the oLEMP.</p> <p>The Council has commented on this document from a landscape and visual perspective in chapter 5 of its LIR [REP1-130] such as paragraphs 5.128 to 5.163 and considers these matters under discussion.</p>	<p>National Grid 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>The document reference for the Outline LEMP is Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].</p> <p>The Applicant has set out their response to the comments from SCC in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	Under discussion
3.9.15	N/A	Sequential Cumulative Effects	The Consultee agreed to the approach for assessing sequential visual effects in relation to cumulative effects via email sent on 30 January 2025.	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	Agreed

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				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.	
3.9.16	<p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3</p>	Scope out Year 15 effects for cable routes and landfall	The Consultee agrees to the approach to Year 15 effects for cable route and landfall based on assumption that all landscape restoration works have been wholly successful. Adequate provision should therefore be included in the relevant control document to guarantee that the growth of planting assumed for the assessment at Year 15 is reached or surpassed.	<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 National Grid 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>National Grid 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 (CoCP) Application Document 9.83 Code of Construction Practice submitted at Deadline 3.</p>	Agreed
3.9.17	N/A	Visual Amenity baseline – Representative vs Illustrative Viewpoints	Viewpoint illustrations being necessary was 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
3.9.18	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.	<p>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.</p> <p>National Grid 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].</p> <p>The design of the diverted PRow within the outline landscape proposals will be developed as part of the future detailed design work stage. It would be</p>	Under discussion

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				presented both in the final LEMP and PRoW Management Plan submitted under requirement 6.	
3.9.19	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 18 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
3.9.20	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape compensation	<p>The Consultee expects the Applicant to undertake appropriate offsetting measures for residual adverse landscape and visual effects that result from the Proposed Project as part of the mitigation hierarchy. Several significant residual landscape and visual impacts are identified in the ES with no additional mitigation or offsetting measures proposed. 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.”</p> <p>Within the Consultee’s statutory consultation response (dated December 2023), on page 14, the Consultee set out that “while embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Mitigation Hierarchy will need to be applied in full, including compensation for impacts that result in adverse landscape and visual effects that cannot be mitigated through embedded measures”.</p>	<p>It is National Grid’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 National Grid’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.</p> <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,</p>	Under discussion

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				<p>including at paragraphs 5.4.35, 5.4.42, 5.4.43, and 5.4.44.</p> <p>Overall, it is National Grid'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>	
3.9.21	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape and Visual value judgements made in the ES	<p>The Consultee disagreed with aspects of the approach in email on 10 October 2024, The Consultee is yet to update its position on the landscape and visual value judgements within the ES following a response from National Grid on 1 November 2024.</p> <p>Landscape Officer revisited NG comments on 1 November 2024 and upheld their reservations that this item has not been agreed.</p>	<p>In an email on 16 September 2024. National Grid 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]).</p> <p>The Applicant acknowledges the comments that were submitted on 30 January 2025 and would request the Consultee to review in light of now receiving the Environmental Statement to set out any outstanding matters to be discussed.</p>	Under discussion
3.9.22	Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]	Landscape and visual sensitivity ratings made in the ES	<p>The Consultee disagreed with aspects of the approach in email on 10 October 2024, The Consultee is yet to update its position following a response from National Grid on 1 November 2024 following request in the 19 November 2024 thematic meeting</p> <p>The Council considers that its concerns over sensitivity ratings have not been addressed</p>	<p>In an email on 16 September 2024 National Grid 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]). Comments were received from the Consultee on 10 October 2024 which were responded to on 1 November 2024 by the Applicant. This response noted that comments would be further discussed in the next thematic meeting. In the meeting minutes from the 19 November 2024, the Applicant discussed the comments with the Consultee and requested more information on landscape and visual sensitivity.</p> <p>The Application Document Local Impact Report (LIR) from any local authorities [REP1-130] from Suffolk County Council sets out at 5.111 that whilst SCC landscape is not fully aligned with the LVIA methodology approach, that the examination should focus on further shaping the design and mitigation of adverse effects of the Proposed Project and securing good outcomes for Suffolk.</p> <p>The Applicant acknowledges the comments that were submitted on 30 January 2025 and would request the Consultee to review in light of now</p>	Under discussion

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				<p>receiving the Environmental Statement to set out any outstanding matters to be discussed.</p> <p>The Applicant will consider the Consultee's position on the sensitivity ratings further.</p>	
3.9.23	<p>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology[APP-095]</p> <p>Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]</p>	Presentation of the Visual Assessment Appendix of the ES	The Consultee agreed to the approach proposed by the Applicant in the 19 November 2024 meeting regarding the presentation of the visual assessment appendix of the ES in an email on 14 February 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, National Grid 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
3.9.24	<p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]</p> <p>Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]</p>	Assessment conclusions	The Council has reviewed the landscape and visual assessment following the submission of the DCO Application and has set out its views in chapter 5 of its LIR [REP1-130]. Conclusions not yet agreed include where the Council's difference of opinion on sensitivities has implications for conclusions of magnitude of effect. The Council also queries the assessment's conclusions regarding impacts on the National Landscape. The bellmouth access to the haul road connecting to the Fromus Bridge does not appear in visualisations produced by the Applicant and the Council is not confident that the landscape and visual impacts of this part of the development has been robustly assessed.	<p>National Grid 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.</p> <p>The Applicant responses to SCC comments on the landscape and visual assessment that have been raised in their Local Impact Report can be found in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	Under discussion

3.10 Ecology and Biodiversity

Table 3.10 Ecology and Biodiversity

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.10.1	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Ecology surveys	<p>The proposed landfall site and cable route is close to the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI.</p> <p>The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which support a variety of bird species, such as woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna.</p> <p>In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant.</p> <p>The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group.</p> <p>The Council is generally content with the Applicant’s suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.</p>	<p>It is noted that the Council is generally content with the Applicant’s suite of ecological surveys. Following a meeting between the Applicant and Surrey County Council on 10 July 2025, the Applicant understands the Council’s concern to relate to deer management to ensure new planting is not damaged given the large deer populations of the area. 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.</p>	Under discussion
3.10.2	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Biodiversity awareness training	<p>The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.</p>	<p>Paragraph 1.6.2 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] does include provision of ‘toolbox talks’ which the Applicant considers analogous to the requested Biodiversity Awareness Training.</p>	Under discussion
3.10.3	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Mitigation and monitoring	<p>The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.</p>	<p>It is noted that the Council welcomes the mitigation measures proposed by the Applicant. Section 7 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] discusses monitoring of the mitigation and planting.</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.10.4	N/A	Aftercare period for mitigation planting	The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.	The acid grassland restoration and enhancement is proposed to be retained for ten years since it is mitigation for a temporary effect (loss of acid grassland to the proposed HDD launch compound) and the grassland in the HDD compound area should have returned to a suitable condition ten years following restoration.	Under discussion
3.10.5	N/A	Acid grassland restoration and enhancement	The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.	The acid grassland restoration and enhancement is proposed to be retained for ten years since it is mitigation for a temporary effect (loss of acid grassland to the proposed HDD launch compound) and the grassland in the HDD compound area should have returned to a suitable condition ten years following restoration.	Under discussion
3.10.6	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060]	Inter-Project Cumulative Effects	The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effect [APP-060] discusses inter-project cumulative effects including on ecology, including with Sizewell C, Lionlink and a range of other projects within Table 13.27 and Table 13.37.	Under discussion
3.10.7	Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Trenchless techniques	The Consultee has agreed to the use of trenchless techniques at landfall. Impacts on protected species within the designated ecological sites should adequately avoided or mitigated such as by timing works appropriately. Particular species of concern are Wintering Birds around the North Warren Reserve where drilling in the winter must be avoided.	National Grid has confirmed trenchless techniques will be used for crossing the SSSI/RSPB reserve and is a commitment in the DCO. This is secured in the Offshore Outline CEMP (Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan) and the Register of Environmental Actions and Commitments (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3)). The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	Under discussion
3.10.8	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Skylark nesting	The survey findings are consistent with Consultee's understanding of skylark presence in the local area. The proposed mitigation is in line with recommendations made by the Consultee i.e. skylark plots. SCC recognises the mitigation for skylarks which could benefit other farmland bird species	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 [CR1-027] , within the oLEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). There are no plans to implement specific mitigation for other farmland bird species. Although bullfinch and	Agreed

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				<p>meadow pipit territories were recorded in the 2024 surveys, the survey area is much larger than the Order Limits and the species were not recorded within the Order Limits or were recorded in the RSPB reserve where they will not be affected by surface works.</p> <p>While a small number of yellowhammer territories have been recorded in the areas of permanent habitat loss, this is far fewer than the number of skylark territories, hence the focus on skylarks. However, the 12ha arable field managed favourably as mitigation for skylarks would also benefit other farmland birds such as yellowhammer e.g. through retention of winter stubble (where spring cereals are sown) and creation of fallow plots of value for foraging in winter cereals.</p>	
3.10.9	Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]	Survey coverage – concern about limitations in land access in 2022-23	SCC has commented on survey reports submitted with the application in its LIR [REP1-130]	<p>Survey coverage and access to remaining areas was resolved in the final survey programme and reports. All ecology survey reports have been submitted into the DCO Examination and have been reviewed by Suffolk County Council and East Suffolk Council ecology officers.</p> <p>The Applicant responses to SCC comments on the survey reports set out in their LIR can be found in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	Under discussion
3.10.10	N/A	Dormouse Surveys	<p>It was requested that if any dormice are found, it is reported to the Councils as this would be a notable find for this part of Suffolk where they are generally considered to be absent. It was also requested that damaged tubes along the old railway line be replaced.</p> <p>SCC understands that there have been reports of the presence of a nest for dormice in the area affected by the project. Sufficient surveys must be undertaken to confirm whether there is presence of dormice in this area.</p>	<p>The Applicant has confirmed that the ecological survey has not confirmed the presence of dormice. However, due to a record of a 'possible' dormouse nest, and the presence of harvest mouse (a NERC Act species), a precautionary approach to the removal of vegetation suitable for dormouse would be followed.</p> <p>Paragraph 7.1.1 of Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059] 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</p>	Under discussion

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				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 (3 rd Edition). Given there is a low expectation of encountering dormice this is considered appropriately precautionary.	
3.10.11	Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]	Biodiversity net gain	This strategy was presented to the Consultee by National Grid at the end of 2024. The Consultee confirmed agreement to the biodiversity net gain strategy. Provision should be made for BNG maintenance and monitoring for a 30-year period in accordance with relevant policy and legislation.	Approach to biodiversity and environmental net gain is set out in Environmental Net Gain Report (Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]). All BNG will be maintained and maintained for 30 years.	Under discussion
3.10.12	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]). National Grid confirm that the comment from ESC came from the ESC landscape team but confirm that the ESC ecology team were present for this conversation.	Under discussion
3.10.13	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] Application Document 6.3.2.2.A (B) 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 to fill gaps overnight). It should be noted there is also a criterion in the latest Bat Conservation Trust survey guidance.	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 (B) 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 Outline LEMP (Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]).	Agreed
3.10.14	N/A	Location of bridge over River Fromus	The Consultee requested the location of the Fromus bridge be moved further north to preserve veteran tree and large horse chestnut.	The location of the Fromus bridge crossing has been moved north avoiding the veteran tree and large horse chestnut and adequate consideration and protection to the veteran tree has been made.	Agreed

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3.10.15	N/A	Fromus Bridge	The potential impacts on BNG of installing the bridge should be assessed by an accredited River Corridor BNG Ecologist and measures to deliver BNG with regard to the river corridor should be drawn up	All surveyors who were involved in aspects of BNG that involved watercourses hold MoRPh accreditation. Any further MoRPh surveys on the River Fromus will be undertaken by surveyors who hold MoRPh accreditation. Proposals for enhancement of the riparian corridor of the River Fromus has been completed by suitability qualified aquatic ecologists and geomorphologists.	Under discussion
3.10.16	N/A	Important hedgerows and construction compounds at the Converter Station Site	The Consultee considers that potential compounds 04/05 are not favoured because they would affect an Important Hedgerow, compared to compounds 02 and 03 which are in an open arable field.	National Grid 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
3.10.17	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Acid grassland mitigation area	<p>Expressed preference for the landowner to be encouraged to retain the enhanced acid grassland following the 10-year mitigation period. SCC also agree with the ESC position on this matter.</p> <p>SCC notes that the Applicant now appears to intend to undertake acid grassland enhancement only without any creation. This will lead to a greater temporary deficit of acid grassland with a lesser benefit to offset the impact due to the greater benefit creation brings. SCC considers that the worsening of this offsetting measure should be rectified through a commitment to some creation or increased provision for enhancement.</p>	<p>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 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]). However, National Grid will encourage the landowner to retain habitat that has been created. This is not a formal commitment but could be done through discussions with the landowner during the 10-year management plan of the Site.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.10.18	Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047]	Assessment methodology presented in the ES	SCC is generally content with the methodology of this ES chapter.	National Grid provided the ecological assessment methodology in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047] and supporting appendices included with the DCO Application.	Under discussion
3.10.19	Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047]	Mitigation presented in the ES	<p>The Council welcomes the mitigation measures proposed by the Applicant in terms of temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.</p> <p>The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.</p>	National Grid set out the mitigation in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047] and supporting appendices included with the DCO Application.	Under discussion

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3.10.20	Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047]	Assessment conclusions presented in the ES	<p>SCC has set out its views on this ES chapter and its conclusions in its LIR [REP1-130].</p> <p>SCC would query how several of the project's construction phase impacts include long term beneficial impacts when such benefits won't be realised until the operational phase. These impacts are also reported for the operational phase. SCC considers that such an approach may dilute the negative impacts which will be realised during the construction phase.</p>	<p>National Grid provided the ecological assessment in Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP1-047] submitted with the DCO Application.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.10.21	Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]	Ecological mitigation and enhancement presented in the Outline LEMP	<p>The Council welcomes the mitigation measures proposed by the Applicant in terms of temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.</p> <p>The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.</p>	<p>National Grid submitted Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] with the DCO Application.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

3.11 Cultural Heritage

Table 3.11 Cultural Heritage

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.11.1	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]	Overarching Written Scheme of Investigation	<p>Suffolk County Council Archaeological Service ("SCCAS") have been engaged in discussions with the Applicant throughout the pre-application process and will continue to engage in the DCO process where appropriate, including in the upcoming Examination. Matters relating to Built Heritage are led by East Suffolk Council, however, other elements related to the historic environment, such as those relating to Archaeology matters, are provided below.</p> <p>All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation ("OWSI"). The submitted OWSI is currently in draft form and comments by SCCAS need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation ("WSIs") following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all subsequent WSIs/contractor method statements would need to be approved by SCCAS.</p>	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated to address comments received from the Archaeological Advisor to the Local Planning Authority (LPA) from SCCAS. In line with SCCAS' preferred approach, the final Overarching Written Scheme of Investigation will set out the requirements for further evaluation and mitigation for the entire Suffolk Onshore Scheme, and will be supplemented by site-specific method statements to be prepared by the appointed archaeological contractor. The final Overarching Written Scheme of Investigation will be agreed with the Archaeological Advisor to SCCAS and submitted during Examination.	Under discussion
3.11.2	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Geophysical survey's	<p>Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin.</p> <p>In communication with NGET's consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.</p>	<p>Remaining areas within the Order Limits that were not available for trenching during the Phase 1 and 2 evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project and site accesses, haul roads, compounds and ecological mitigation that would result in ground disturbance, will be subject to further intrusive trial trench evaluation.</p> <p>Further trial trench evaluation and mitigation strategies, which will include detailed archaeological excavation and recording and methodology for the preservation of archaeological remains, will be secured in the DCO (Requirement 14 of Application Document 3.1 (E) draft Development Consent Order [CR1-027])</p>	Under discussion

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			<p>SCCAS consider that any remaining areas within the order limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project. All site accesses, haul roads, compounds and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined.</p> <p>For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.</p>	through the final Suffolk Onshore Overarching Written Scheme of Investigation which is being agreed currently with the Archaeological Advisor to the LPA from SCCAS.	
3.11.3	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Archaeological mitigation at the Saxmundham converter station	The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and LionLink at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.	<p>Noted. The assessment of impacts for Suffolk as detailed in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] was based on three possible options for a temporary construction compound north of the Saxmundham Converter Station, two of which fell within the area of the archaeological remains.</p> <p>The detailed design work that is ongoing currently places the temporary construction compound to the west of the archaeological remains and therefore impacts are no longer expected.</p> <p>If this changes, a mitigation strategy will be developed in consultation with the Archaeological Advisor to the LPA from SCCAS, and will be agreed as part of the final Suffolk Onshore Overarching Written Scheme of Investigation.</p>	Under discussion
3.11.4	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]	Archaeological mitigation	At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree further evaluation and mitigation requirements with the Archaeological Advisor to the LPA from SCCAS for areas where preservation in situ will not be possible,	Under discussion

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			previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within documents 6.2.2.1 or 6.2.2.3.	and where the Suffolk Onshore Scheme will result in physical impacts.	
3.11.5	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]	Cumulative archaeological impact	<p>Given the interaction with the EA1N/2 and LionLink schemes, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme.</p> <p>The Council understands that NGET (Sea Link) and National Grid Ventures (LionLink) are looking into a data sharing agreement. The Council supports this as it would avoid duplication of effort. Co-operation with SPR will also be beneficial, given the overlapping nature of this scheme with the EA1N/2 project.</p>	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including methods of preservation in situ, with the Archaeological Advisor to SCC as the Suffolk Onshore Scheme detailed design is progressed and the final OWSI is developed.	Under discussion
3.11.6	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]	Archaeological remains	Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including methods of preservation in situ, with the Archaeological Advisor to SCC as the Suffolk Onshore Scheme detailed design is progressed and the final OWSI is developed.	Under discussion
3.11.7	N/A	Preservation in situ requirements	<p>To the west of Grove Road at Friston, the order limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO order limits as part of the Sea Link project, in line with preservation in situ requirements.</p> <p>Any works within the area of KND 009 must be in line with the agreed Preservation in Situ strategy being followed by the EA1N/2 project (SCCAS do not agree with the interpretation made in the geophysical survey report and as no trial trenched evaluation has been undertaken within this part of</p>	<p>Noted. The Historic Environment Record (HER) record for this asset notes that the location provided for the lost church for asset KND 009 may be incorrect, with two further locations suggested (KND001 and KNG006). Geophysical survey undertaken as part of the EA1N/2 works interpreted the anomalies in the area of KND 009 as likely to be geological in origin rather than archaeological.</p> <p>The works proposed in this area are limited to supplementary planting to an existing hedgerow. This planting mitigation is already consented as part of the EA1/2 scheme, and as such comprises of consented works.</p>	Under discussion

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			the proposal area, a cautious approach must be followed given this is a possible church site with the potential for the survival of remains of high significance).	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	
3.11.8	N/A	Timing of archaeological works	As has been shown by other NSIPs in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule. Numerous large projects taking place in the county at the same time is putting significant pressure on available archaeological work forces, therefore SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity.	Noted, no further response required.	Agreed
3.11.9	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]	Archaeological Outreach Strategy plan	Finally, although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] is currently being updated in line with comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant will agree mitigation, including a suitable and proportionate programme of outreach with the Archaeological Advisor to SCC as the final OWSI is developed.	Under discussion
3.11.10	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk	Ground Investigation Works	Agreed approach prior to works starting in 2023, with the Consultee approving an Outline Written Scheme of Investigation (OWSI) produced by the archaeological subcontractor (Headland).	Email correspondence throughout 2022-2023 to agree location of GI works to avoid heritage assets/areas of archaeological potential and also agree the level of monitoring required.	Agreed
3.11.11	Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057].	Geophysical Survey scope	Suffolk County Council approved Geophysical Survey Written Scheme of Investigation (WSI) September 2023 (Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk) and are generally happy with the scope of geophysical survey proposed/undertaken so far. SCCAS are happy to approve this additional appendix to the previously approved and submitted geophysical survey report [CR1-057].	Agreed through discussions in early 2023, and via a Written Scheme of Investigation approved September 2023. The scope of subsequent geophysical surveys in the area mentioned was agreed and has now been undertaken. The results of the geophysical survey are presented in Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057].	Agreed
3.11.12	N/A	Assessment of effects at statutory consultation	Acknowledged 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 were further assessed with more detail within the ES chapter in line with the methodology and professional judgement.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.11.13	Application Document 7.4.3 Draft Statement of Common Ground Between National Grid Electricity Transmission and Historic England [REP1-075]	Location of Archaeological Evaluation Trenches	<p>The Consultee agreed trench locations via email in April 2024</p> <p>Due to an archaeological discovery of national significance during the Phase 2b trenching works, an additional area requiring trial trenched evaluation has been identified in order to inform an alternative route which avoids this site. The location of evaluation trenches in these new areas are yet to be agreed.</p>	<p>The location of the first phases (Phases 1, 2a and 2b) of archaeological evaluation trenches were discussed at the virtual thematic group meeting in February 2024 and agreed via email in early March 2024.</p> <p>The discovery of a possible feature of national significance as part of the Phase 2b trenching has now been revised and the feature is now understood to be a G-shaped enclosure that is of local or regional significance and not national significance. This has been agreed through consultation with Historic England and Suffolk County Council (see Line 3.4.4. of Application Document 7.4.3 Draft Statement of Common Ground Between National Grid Electricity Transmission and Historic England [REP1-075])</p> <p>An additional phase of trenching (defined as Phase 3) was agreed in November 2025 to examine the area where a Change Request to the Order Limits has been submitted as a result of the discovery of the G-shaped enclosure.</p> <p>This trenching was completed in December 2025, and the report will be submitted before the end of the examination period.</p>	Under discussion
3.11.14	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 approach to approving the archaeological trial trenching will be through 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
3.11.15	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]	Assessment methodology presented in the ES	SCC's comments on this ES chapter can be found in its LIR [REP1-130]. SCC is generally content with the methodology presented in this chapter though disagreement remains over how the conclusions of the assessment should be reflected in the OWSI and adequately secured in the DCO.	<p>National Grid submitted the final cultural heritage assessment methodology in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and supporting appendices with the DCO Application.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.11.16	Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] Application Document 7.5.4.1 Outline Onshore Overarching	Mitigation presented in the ES and archaeological mitigation strategy	All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation ("OWSI"). The submitted OWSI is currently in draft form and comments by SCCAS need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the	National Grid set out the mitigation within Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and Archaeological mitigation strategy (Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI)- Suffolk [APP-343]) in the DCO	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Written Scheme of Investigation (OWSI)- Suffolk [APP-343]	<p>proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation (“WSIs”) following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all subsequent WSIs/contractor method statements would need to be approved by SCCAS.</p> <p>Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin.</p> <p>In communication with NGET’s consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.</p> <p>SCCAS consider that any remaining areas within the order limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project. All site accesses, haul roads, compounds and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined.</p> <p>Due to an archaeological discovery of national significance during the Phase 2b trenching works, resulting in a site being identified which requires preservation in situ, an additional area requiring geophysical survey and trial trenched evaluation has been identified in order to inform an alternative route which avoids this site. As such, undertaking archaeological evaluation to find a suitable alternative route</p>	<p>Application, as secured by Requirement 14 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027].</p> <p>Responses to each of these points raised in the Consultee’s Current Position are provided above.</p>		

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			<p>should be undertaken at the earliest opportunity within the examination process and prior to the end of the examination period, so that the results of this work can be factored into the design and decision-making process in order to appropriately safeguard important heritage assets. Provisions must be made to expand the preservation in situ area should further associated remains be identified during ongoing assessment works.</p> <p>For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.</p> <p>The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and LionLink at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.</p> <p>At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within documents 6.2.2.1 or 6.2.2.3.</p> <p>Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during precommencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be</p>		

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			<p>agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.</p> <p>To the west of Grove Road at Friston, the order limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO order limits as part of the Sea Link project, in line with preservation in situ requirements.</p>		
3.11.17	<p>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]</p> <p>Application Document 6.3.3.3.B ES Appendix 3.3.B Cultural Heritage Gazetteers [APP-162]</p> <p>Application Document 6.3.3.3.C ES Appendix 3.3.C Site Photos [APP-163]</p> <p>Application Document 6.3.3.3.D ES Appendix 3.3.D Geophysical Survey Report [APP-164]</p> <p>Application Document 6.3.3.3.E ES Appendix 3.3.E Aerial Photography and LiDAR Report [APP-165]</p> <p>Application Document 6.3.3.3.F ES Appendix 3.3.F Archaeological Evaluation Trial Trenching Report [APP-166]</p> <p>Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]</p>	Assessment conclusions presented in the ES	SCC is content with the assessment conclusions presented in this chapter based on the information available from phase 1 trenching. Provision should be made for adequate mitigation according to the assessment conclusions from phase 2 and 3 trenching and this should be reflected in the OWSI.	<p>The cultural heritage assessment is set out in Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050] and supporting appendices Application Document 6.3.3.3.B ES Appendix 3.3.B Cultural Heritage Gazetteers [APP-162], Application Document 6.3.3.3.C ES Appendix 3.3.C Site Photos [APP-163], Application Document 6.3.3.3.D ES Appendix 3.3.D Geophysical Survey Report [APP-164], Application Document 6.3.3.3.E ES Appendix 3.3.E Aerial Photography and LiDAR Report [APP-165], Application Document 6.3.3.3.F ES Appendix 3.3.F Archaeological Evaluation Trial Trenching Report [APP-166] and Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167].</p> <p>Mitigation will be set out in the OWSI as appropriate.</p>	Under discussion

3.12 Water Environment

Table 3.12 Water Environment

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.12.1	Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk [APP-038].	Infiltration	<p>National mapping for the converter station site area suggests soils have poor properties for infiltration. Therefore, the Council, as Lead Local Flood Authority ("LLFA"), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network.</p> <p>The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, in the event that the substation is not delivered under SPR's existing consent.</p>	<p>The Applicant has undertaken preliminary ground investigations at the Saxmundham Converter Station site that have confirmed poor infiltration rates. The Applicant's proposal for drainage in this location is to attenuate the flow to greenfield runoff rates and outfall to local watercourses. Indicative layouts for the attenuation ponds and outfalls are shown within Application Document 2.14.1 Indicative General Arrangements Plans - Suffolk [APP-038].</p> <p>At Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate to a surface watercourse that is part of the wider watercourse network. The Applicant is continuing to work closely with SPR to understand their design development at detailed design which may enable the removal of the outfall pipe from the required design. Should the Applicant need to deliver the Friston Substation, any investigation results would be requested from SPR to be validated and used to inform the detailed designs of the drainage system to be delivered by the Applicant.</p>	Under discussion
3.12.2	N/A	Surface water drainage strategy	<p>The Applicant needs to clearly demonstrate that the outline surface water drainage strategy (Appendix C of [APP-292]), adheres to the National standards for sustainable drainage systems (SuDS). Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292] is in the LLFA opinion lacking insufficient detail at this time to provide sufficient assurance that a surface water drainage strategy will be implemented in accordance with LLFA requirements, i.e. basin depth, water depth, side slopes etc. The DCO should reference an outline drainage strategy for both the converter station and the substation.</p> <p>The Applicant should engage its contractors as early as possible to better inform the outline drainage strategy to give the LLFA assurance that adequate mitigation will be implemented according to the requirements of the LLFA relevant policy and legislation for both construction and operation</p> <p>There should be a requirement in the DCO for a detailed surface water drainage strategy to be approved by the LLFA.</p>	<p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.12.3	Application Document 6.8 Flood Risk Assessment [APP-292]	Drainage return period	<p>The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction.</p> <p>The Council acknowledges the Applicant's position. Concerns remain around the attenuation sizes around the haul road drainage given that the haul road width is not fixed at this stage. Therefore, the Applicant will need to ensure there is sufficient space for attenuation volumes at the haul road once the haul road design is fixed post-consent.</p>	<p>Suffolk Flood Risk Management Strategy, dated 2023, states 'temporary SuDS designed and built for the construction phase only must be designed to manage runoff for all events up to and including the 1 in 100 (1%) AEP storm (SCC local standard), but no allowance for climate change is required'. Therefore, a 1 in 100-year return period will be applied to all temporary works including haul roads.</p> <p>Appendix C of Application Document 6.8 Flood Risk Assessment [APP-292] provides information on the drainage proposals for haul roads. For the purposes of sizing drainage features, the haul road surface has been treated as 100% impermeable and calculations are based on an average haul road width of 7 m. A channel drain along the edges of the haul road will collect runoff and will discharge into proposed attenuation ponds which include a treatment element to clean anticipated pollutants from the road. The haul road has been subdivided into sections based on the existing longitudinal ground profile and a pond allowed for at anticipated low points along the route. The ponds proposed are either, infiltration ponds where ground investigations have demonstrated that infiltration is viable, or attenuation ponds where infiltration is considered unviable. Attenuation ponds would discharge into existing watercourses via a control device that limits discharge rates to greenfield. Sufficient space has been provided within the Order Limits to accommodate such drainage provision.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.12.4	Application Document 6.8 Flood Risk Assessment [APP-292] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 Application Document 2.14.1 Indicative General Arrangement Plans [APP-038]	Pluvial flood risk	<p>Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Surface Water Study ("SWMP") for Friston.</p> <p>Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring there is adequate space available for any necessary mitigation within the Order Limits.</p> <p>Whilst the new national flood maps have been used for pluvial flood risk, they only appear show the predicted flood risk now and haven't shown the predicted pluvial flood maps with climate change applied.</p>	<p>Surface water flood map plans are provided in the Application Document 6.8 Flood Risk Assessment [APP-292], specifically Figures 2A and 2B in Appendix A. These maps clearly present the high, medium and low flood risk zones, based on the latest National Flood Risk Assessment (NaFRA2) from the Environment Agency, in the context of the Proposed Project's temporary works (Figure 2A) and operational infrastructure (Figure 2B). Further, an extract of mapping from the BMT SWMP for Friston is provided in Plate 4.1 of Application Document 6.8 Flood Risk Assessment [APP-292].</p> <p>The Proposed Project infrastructure has been sited to avoid areas at high risk of pluvial flooding where practicable. Where these areas have not been avoided a range of mitigation measures are secured, as detailed in commitments W06, W07, W10 and W14 of the Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3.</p>	Under discussion

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				<p>The areas required for the SuDS assets proposed are shown in Application Document 2.14.1 Indicative General Arrangement Plans [APP-038].</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.12.5	<p>Application Document 6.8 Flood Risk Assessment [APP-292]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	Surface water flood risk	<p>The Council is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of SPR's EA1N/2 project. Sea Link's Order Limits should provide sufficient space for drainage and mitigation. The Council LLFA have also produced a Surface Water Study for the Friston catchment, which will assist the Applicant in assessing existing surface water flood risk in the area. This has been considered in the Applicant's Flood Risk assessment.</p> <p>The Environmental Statement ("ES") should recognise historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.</p>	<p>The flood risk sensitivity and history of flooding at Friston is detailed in the Application Document 6.8 Flood Risk Assessment [APP-292], which has been informed by outputs from the Friston Surface Water Management Plan which were received from Suffolk County Council in January 2024. Table 4.1 in this Flood Risk Assessment (FRA) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant s.19 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 (Section 4 of Application Document 6.8 Flood Risk Assessment [APP-292]).</p> <p>Proposed drainage principles are set out in Appendix C of the FRA. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate.</p> <p>The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation.</p> <p>In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation and infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPRs proposals included for a potential Air Insulated NGET substation which would be significantly larger than the Gas Insulated substation for the Proposed Project.</p> <p>The Proposed Project has made the following commitment W11 within Appendix B of the CEMP (Application Document 9.84</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3) which 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>	
3.12.6	<p>Application Document 6.8 Flood Risk Assessment [APP-292]</p> <p>Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk [APP-038]</p>	Ordinary watercourses	<p>The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, in particular the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to an ultimate viable discharge point.</p> <p>The proposed substation is located directly over an ordinary watercourse. A surface water flow path adjacent to this watercourse has been identified as part of the BMT Surface Water Study, which would directly impact the chosen site location. The natural infiltration basin on site has also not been considered, this forms a critical component of the natural surface water regime.</p>	<p>Whilst not all ordinary watercourses are shown in the Applicant's figures, all of those ordinary watercourses that the Proposed Project interacts with have been subject to surveys and have been assessed as receptors within the ES and in Application Document 6.8 Flood Risk Assessment [APP-292]. Application Document 2.14.1 Indicative General Arrangement Plans – Suffolk [APP-038] identifies the temporary and permanent infiltration and attenuation ponds and the outfalls proposed for the attenuation ponds.</p> <p>The ordinary watercourse mentioned in point 57 would be diverted along the northern boundary of the proposed Friston Substation as proposed by SPR. The natural infiltration basin adjacent to the proposed permanent access road remains unchanged by the works associated with the Proposed Project.</p> <p>As stated in commitment W01, ‘<i>All works within main rivers, ordinary watercourses and board drains, will be in accordance with a method approved under environmental permits issued under the Environmental Permitting Regulations by the Environment Agency and /or the relevant secondary consents or permits from the Lead Local Flood Authorities and Internal Drainage Boards</i>’.</p>	Under discussion
3.12.7	Application Document 6.8 Flood Risk Assessment [APP-292]	Methodology used for the initial sizing of drainage features	Having reviewed the FRA, SCC is content with the methodology used for the initial sizing of drainage features at this time.	<p>Proposed drainage principles are set out in Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292]. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate.</p> <p>The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR</p>	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation.</p> <p>In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation/infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPR's proposals included for a potential AIS NGET substation which would be significantly larger than the GIS substation proposed by the Proposed Project.</p>	
3.12.8	Application Document 6.8 Flood Risk Assessment [APP-292]	Proposed Friston substation drainage strategy	<p>There is an inconsistency with SPR's proposed Friston substation drainage strategy. The Flood Risk Assessment and plans do not provide clarity on the proposed system. Plans and some text suggest a single infiltration basin with overflow; other text suggests an overflow attenuation basin.</p> <p>SCC welcomes the ongoing collaboration between the Applicant and SPR and considers that the strategy should be updated once SPR's is approved.</p>	<p>Proposed drainage principles are set out in Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292]. This describes that at Friston Substation, a hybrid drainage solution is proposed, whereby an infiltration pond would attenuate flows up to a 1 in 100-year storm event with a piped outfall. The pipe outfall is proposed as an overflow release device for the infiltration pond, sized to discharge at the greenfield runoff rate.</p> <p>The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation.</p> <p>In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including attenuation/infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPR's proposals included for a potential AIS NGET substation which would be significantly larger than the GIS substation proposed by the Proposed Project.</p>	Under discussion

3.13 Geology and Hydrogeology

Table 3.13 Geology and Hydrogeology

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.13.1	<p>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p> <p>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]</p>	Excavation of minerals	<p>The Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.</p> <p>Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of, a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and; e) disposal.</p> <p>Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities.</p> <p>In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals.</p> <p>Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development or provided to the market for sand and gravel where possible.</p>	<p>The ES includes references to applicable control and management measures for waste. Further detail can be found in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 9.83 Code of Construction Practice submitted at Deadline 3 and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3. There is also a separate Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339].</p> <p>The waste hierarchy will be followed with a Material and Waste Management Plan to be developed and submitted to and approved by the local planning authority prior to construction of the Proposed Project. This will set out the framework for the management of waste generated during the construction of the Proposed Project. Further details are contained in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]. This Plan will set out, in an auditable manner, how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy.</p>	Under discussion
3.13.2	<p>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003]</p>	Access to mineral resources	<p>Removal of the development following cessation of use will be required to restore access to mineral resources.</p> <p>The Applicant’s position does not appear to cohere with paragraph 3.1.2 of the Preliminary Minerals Resource Assessment [APP-118] which states:</p> <p><i>“This infrastructure is generally considered to be temporary, as although during the operational lifetime of the Proposed Project the areas of mineral could not be feasibly extracted (beneath the built elements), on decommissioning, the infrastructure could be removed and access to the underlying mineral restored”</i></p> <p>If the Applicant has no plans to decommission the proposed project, the infrastructure and its effects should not be considered to be temporary.</p>	<p>As stated in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003] of the ES, there are no plans to decommission the Proposed Project. In the event it is to be decommissioned, a written scheme of decommissioning would be submitted to the relevant planning authority at least six months prior to any decommissioning works. Further details associated with decommissioning are provided in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003] of the ES.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

3.14 Agriculture and Soils

Table 3.14 Agriculture and Soils

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.14.1	Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]	Best and most versatile (“BMV”) agricultural land	Areas of best and most versatile (“BMV”) agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning.	Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053] states that the total area of BMV land required permanently in Suffolk is 11.45ha. In the event that the Proposed Project is decommissioned and the land is reinstated this would also involve the reinstatement of land used for above ground infrastructure. This would comprise the reinstatement of the BMV land required permanently in Suffolk, with land returned to the baseline ALC grade where practicable. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning and detailed in the Outline Soil Management Plan (Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]). Implementation of these measures would reduce detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement (which includes productivity).	Under discussion
3.14.2	Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]	Best and most versatile (“BMV”) agricultural land	Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning.	During decommissioning, there would be temporary disturbance on BMV land assumed to be similar to that identified during the construction phase. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning as set out in the Defra Construction code of practice for the sustainable use of soil on construction sites (Department for Environment, Food and Rural Affairs, 2009), and detailed in the Outline Soil Management Plan (Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]). Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement.	Under discussion
3.14.3	Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3	Disruption to field drains	The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and mitigation would be required to restore drainage following construction and decommissioning.	Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of commitment W10 (from Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 is as follows: <i>“Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative</i>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p><i>drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained."</i></p> <p>Compliance with the REAC is secured through DCO Schedule 3, Requirement 6 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.</p>	
3.14.4	<p>Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]</p> <p>Application Document 6.3.2.6.A ES Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk [APP-121]</p>	Survey density	The Consultee queries the proposed survey density, as set out in the assessment methodology, and would like to understand how this equates to the requirement in published guidelines.	<p>Surveys are proposed to be undertaken post consent and pre-construction (due to elevated unexploded ordnance (UXO) risk preventing the Agricultural Land Classification (ALC) surveys being undertaken) and will be undertaken in line with published guidance (Ministry of Agriculture & Ministry of Agriculture, Fisheries and Flood, 1988) at a density of 1 auger bore per hectare (see Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]).</p> <p>A predictive approach has been adopted to inform the assessment presented in the ES. This uses best available data (including some exiting soil auger data from the National Soil Resources Institute) and follows the ALC grade assessment process as set out in published guidance. This aligns with the predictive approach used to develop the Predictive ALC map in Wales and the approach which is being used (by Natural England and Cranfield University) to develop a similar resource for England. During consultation the use of the predictive approach was deemed sensible.</p>	Under discussion
3.14.5	Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]	Soil management	<p>The Consultee asked that lessons learned from the Bramford to Twinstead project be taken on board, in particular the allowance for soils to be moved when wet.</p> <p>The threshold of >10mm of rain in 24 hours should be reconsidered in relation to particularly sensitive soils, particularly clay soils, since there can be substantial rainfall which does not meet the definition of heavy rainfall which makes these soils wet to the extent that they will be damaged by stripping and handling.</p> <p>The Applicant recognises that there are significant areas of deep loamy and clay soils which are more susceptible to damage if handled when wet. However, no specific commitments are included on how works would be managed in relation to such soils where there's rainfall. It is not sufficient to say that the soil type will be "taken into account" as the Applicant may decide to simply continue works which damage the soils. Text should be revised to add specific commitments over how these soils will be managed and protected during wet conditions.</p>	<p>The Bramford to Twinstead project did not initially commit to producing a Soil Management Plan (SMP). However, the commitment was given to producing an SMP during examination. The Proposed Project has learned from this and an outline SMP (oSMP) (Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]) has been produced for the DCO Application. This will require soils to be handled when suitable dry and friable. However, there may be soils which are rarely non-plastic which will need to be moved, or critical works to be completed. The oSMP requires soil plasticity tests to be undertaken and decisions recorded should soils be handled when plastic.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

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			<p>The Council is therefore not satisfied that paragraphs 6.1.1 to 6.1.5 are sufficiently robust as the commitments are not strong enough to avoid lasting damage from the stripping and handling of soils in wet conditions.</p> <p>Appendix C: the “no handling” box of the flow chart should include a firm commitment, rather than “as far as reasonably practicable”, for soils handled in wet conditions to be reconditioned prior to reinstatement. At least, there is a need for more information on what conditions determine what is practicable in relation to handling of wet soils. The wording needs to be specific on how clay soils would be handled in terms of restoration as this may take a long time. Under the current wording, restoration of clay soils may never be practicable due to the length of time it could take to properly restore these soils. It would be unacceptable to return land to farmers with far lower quality soil. There should be sufficient measures to ensure such a scenario would not occur under this Order.</p>		

3.15 Traffic and Transport

Table 3.15 Traffic and Transport

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.15.1	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</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 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]</p> <p>Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110]</p> <p>Application Document 9.35.1 Applicant’s Comments on Local Impact Report from Suffolk County Council [REP2-026]</p>	<p>Cumulative effects:</p> <p>Assessment of cumulative effects</p>	<p>The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables’ EA1N and East Anglia THREE (“EA3”) will still be within their construction phase and LionLink may also commence within this period. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this.</p> <p>The total peak number of HGVs associated with this project is 346 two-way movements (173 deliveries). This exceeds Scottish Power (270 two-way movements) but is below Sizewell C’s 500 two-way movements (early years) and 600 two-way movements (peak year). Preceding projects have undertaken cumulative impact assessment of the whole of the A12 between Ipswich and Lowestoft.</p> <p>In view of the HGV volumes above, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. At Preliminary Environmental Information Report stage, the Council reserved its position on the extent of the transport assessment scope awaiting sufficient data to make a judgement.</p> <p>The Council’s primary concern is safety particularly at evolved junctions where delays joining the main carriageway may result in driver frustration and risk taking.</p> <p>The Council has commented on the Applicant’s cumulative effects assessment in chapter 11 of its LIR [REP1-130] and does not consider the technical note on this assessment submitted prior to deadline 2 to address these concerns as set out in the Council’s response [REP2-062].</p>	<p>A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other major projects on the Suffolk highway network has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other schemes. This includes a cumulative assessment of Driver Delay and Road Safety for the road links and junctions within the study area.</p> <p>Whilst it is acknowledged that there will be a daily peak of 346 two-way HGV movements (173 HGV deliveries) regarding construction of the Proposed Project, this represents the forecast level of activity for the single busiest day of the programme and the assessment is therefore based on a very much worst-case short-term impact. This peak level of HGV movement drops to 230 daily two-way HGV movements (115 HGV deliveries) when excluding the busiest month of the programme. Furthermore, there is expected to be an average of 106 daily two-way HGV movements (53 HGV deliveries) across the entire construction programme, which represents 30% of peak assessed levels. Therefore, the level of forecast HGV activity which will be experienced for 59 months of the 60-month programme (98% of the construction programme) falls below the peak levels identified for Scottish Power and Sizewell C construction.</p> <p>Nonetheless, the Traffic and Transport cumulative assessment includes the A12 to the north and south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes. This has been based on the same Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement thresholds and assessment criteria, which have informed the assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], which includes assessments of Driver Delay and Road Safety at junctions. The potential for driver frustration and risk taking to arise at junctions is not</p>	Under discussion

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				<p>expected given that the Proposed Project is assessed to not result in any significant effects with respect to Driver Delay at junctions, as set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are also set out in the Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122].</p> <p>A further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details in support of the conclusions. This provides further information on the assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. These findings were presented to SCC during a thematic meeting held on 6 August 2025. Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110] provided more detail about the methodology and findings of the cumulative assessment, in consideration of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance about the findings, including with respect to mitigation.</p> <p>While the Council has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other schemes have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each scheme. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation where necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated.</p> <p>SCC comments in the LIR are noted and the Applicant's responses to the comments are provided in Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].</p>	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.15.2	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p>	<p>Cumulative effects:</p> <p>Peak traffic movements</p>	<p>The reliance of energy projects including SeaLink to use shift patterns to avoid worker trips during network peaks may, in combination with other projects, result in new peaks at the time workers arrive and depart. Insufficient evidence is provided to demonstrate that the combined impacts of the energy projects will not create a new network peak due to superimposition of shift changes.</p> <p>Transport impacts caused by new network peaks may not be lower than those assessed. The increased duration of impacts caused by new network peaks may also be a relevant factor when assessing the magnitude of these impacts. The Applicant should be proactive in working collaboratively with the promoters of cumulative schemes such as Sizewell C and the Local Highway Authority to monitor this phenomenon and minimise effects should new network peaks arise. A commitment to this should be made in a relevant control document such as the OCTMTP.</p>	<p>As set out within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041], the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. This is a control and management measure which will be secured as part of the CTMTP (Schedule 3, Requirement 6 of the draft DCO) to minimise impacts during the busiest (and most congested) times of the day, particularly in terms of Driver Delay. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] does not identify any likely significant effects for the assessment of Driver Delay as a result of these proposed working hours which are designed to avoid worker trips during the network peaks. The assessments consider both the network peaks and the development peaks based on the construction traffic forecasts during the peak construction period and are therefore robust.</p> <p>It is acknowledged that the Proposed Project will be under construction alongside other schemes in the area which has been considered Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] for each discipline, including Traffic and Transport. Whilst there is the potential for construction workers associated with multiple schemes to create new network peaks by avoiding travel during the network peaks, this would be less impactful on road congestion and junction performance than the alternative scenario where construction workers travel during the network peaks. Nonetheless, the potential for any new peaks to occur will be subject to the programmes of other developments and likelihood and durations of any construction peaks overlapping. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] is based on a worst-case scenario, that the peak construction phase of each scheme would overlap.</p> <p>Further discussions have been held with SCC Highways during an in-person meeting on 6 August 2025 which reviewed these cumulative considerations in more detail. The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of the Proposed Project in combination with other projects.</p>	Under discussion

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				The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	
3.15.3	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60]	Cumulative effects: Assessment	The Consultee requests a review of SPR schemes, including if delivered sequentially over 5 years.	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60] includes a review and assessment of the SPR schemes i.e. East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The Traffic and Transport cumulative assessment includes the SPR schemes as set out within Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note .	Under discussion
3.15.4	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60] Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] Application Document 7.10 Coordination Document [APP- 363]	Cumulative effects: Consideration of effects	The Consultee expects significant impacts (particularly on A1094 corridor and A12 as far south as A12/A14 Seven Hills roundabout) as a result of cumulative traffic (Sea Link, Sizewell C, Lion Link and SPR schemes) on routes leading to and in close proximity to the Suffolk Coast	The consideration of cumulative effects as a result of committed developments is set out within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60] based on Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238] , which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The traffic and transport cumulative assessment includes the A12 to the south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are set out in the TAN which has been prepared for Suffolk (Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]) in support of the traffic and transport chapter.	Under discussion
3.15.5	N/A	Cumulative effects: Assessment	The Consultee suggests that Sizewell C has been underestimated (particularly on A1094 corridor) and requests a review of Sizewell C traffic flows. Peak year traffic data should be used in the cumulative impact assessment given close overlap of peak year assessments (2028/2029). Additional traffic survey data is being collected by Sizewell C which should be reviewed by the Applicant.	The cumulative assessment of the Sizewell C – main development site includes construction traffic during the peak construction phase of Sizewell C. The trip generation forecasts have been taken from the Consolidated Transport Assessment which informed the DCO submission for Sizewell C, including Tables 8.7 and 8.8 which identified forecast traffic flows across the network during the peak construction phase for the weekday peak hours and across the day. These vehicle trips also include other elements of Sizewell C during the construction phase, including the Northern Park and ride and Southern Park and ride. It is therefore considered that a robust assessment has been carried out for the Sizewell C – main development site by considering additional vehicle trips associated with the peak	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>construction phase of the development which include other elements of Sizewell C.</p> <p>The additional surveys being carried out by SZC are noted.</p>	
3.15.6	<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>	Coordination with other developers	<p>The Council encourages NGET to continue discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated HGV movements, workforce numbers and traffic management on the highways network. Commonality could be found in sharing Delivery Management Systems or platforms for permitting highway works</p> <p>At present the Applicant has not considered Protective Provisions or a separate Highways Agreement to secure the authority's position as LHA. SCC has not yet had engagement with the Applicant to negotiate protective provisions</p>	<p>The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in Application Document 7.10 Coordination Document [APP- 363] and cumulative traffic impacts are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of the Proposed Project in combination with other projects.</p> <p>The Applicant is maintaining ongoing dialogue with the LHA, including negotiation of Protective Provisions. A draft Statement of Common Ground was submitted with the DCO application, but it is acknowledged there was not sufficient time for the Council to contribute at that time. Further thematic and monthly meetings have been held with the Council since the DCO application. Their input to the next draft of the Statement of Common Ground is being sought and they are being given time to review and contribute prior to this next draft being submitted to the Planning Inspectorate.</p>	Under discussion
3.15.7	Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Coordination with other projects	The Consultee suggests that due regard should be made to Sizewell C and SPR Management Plans and Travel Plans, to co-ordinate with these (and their mitigation), to minimise impacts	<p>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], includes complimentary management measures, controls and monitoring information to those set out within the management plans for Sizewell C and East Anglia Projects where applicable.</p> <p>The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to Application Document 7.10 Coordination Document.</p>	Under discussion

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3.15.8	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects	Coordination with other projects	The Consultee suggests that highway improvements brought forward by Sizewell C may provide more suitable access to/ from the north for Sea Link, including the potential use of the Sizewell Link Road once this has been constructed.	<p>The Proposed Project is coordinating with other large scale infrastructure projects, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to Application Document 7.10 Coordination Document.</p> <p>Further to the above, it is acknowledged that several improvements may have been implemented across the surrounding highway network within or in close proximity to the Site as a result of other highway schemes and committed developments. In terms of operation, these highway improvements would increase the capacity of the highway network to accommodate construction traffic associated with the Suffolk Onshore Scheme. Nonetheless, for the purposes of Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects it has been assumed that none of these improvements would be in place for robustness.</p> <p>The B1122 is proposed as an AIL access only; it has not been used as a construction access due to the potential impact of routing construction traffic through Leiston and Coldfair Green. The project proposes to use the A12/B1121 junction as the access for Converter Station traffic. National Grid would welcome further discussion on any concerns the council has with the junction arrangement or use.</p>	Under discussion
3.15.9	Application Document 7.10 Coordination Document	Colocation/Coordination with other projects	The Consultee requests further consultation with Sizewell C, NG Ventures and SPR to minimise highway impacts associated with HGV movements, workforce numbers and traffic management, and to and explore potential use of Sizewell Link Road (for example)	The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to Application Document 7.10 Coordination Document .	Under discussion
3.15.10	Application Document 7.10 Coordination Document	Coordination with other projects	The Consultee supports co-location/ co-ordination with LionLink to reduce overall transport impact on Suffolk and suggests that co-location could take advantage of consented transport improvements in the area where possible	Our plans in Suffolk have been developed for the Proposed Project as a standalone project but have been designed in a coordinated way with other projects. As development work on the Proposed Project and these other projects has progressed, our approach to coordination has evolved. A key part of our coordination strategy is to continue to explore opportunities to co-locate infrastructure where feasible and beneficial. At statutory consultation, we presented a Sea Link design which showed the NGV works themselves at the landfall and along the cable sections. It also included the entire wider site at Saxmundham, to show how we could be flexible if constructing around one or two additional converter stations. This assumed a scenario where the NGV projects, whose routing and siting work is at an earlier stage, identified the same cable and converter station sites as Sea	Under discussion

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				Link. In March 2024, NGV's LionLink project announced that its potential landfall at Aldeburgh would be removed from its proposals. LionLink is still proposing to co-locate its converter station alongside the Proposed Project's near Saxmundham. As our own design work and our engagement with the NGV projects has progressed, we have evolved our approach to coordinating with NGV. We are considering further ways that we could coordinate our construction activities and other projects and developers, including National Grid Ventures, EDF Energy and ScottishPower Renewables. Further details on the coordination between other developments and projects is set out within the Coordination Document (Application Document 7.10 Coordination Document).	
3.15.11	Application Document 7.10 Coordination Document	Coordination with other projects	The Consultee would support proposals that seek to co-ordinate access arrangements with other energy projects (e.g. EA1N) in the vicinity to reduce impacts (landfalls, cable corridors, converter station sites)	<p>Coordination amongst the several energy projects planned for Suffolk in the years ahead features as a significant theme of statutory consultation feedback. Coordination is a key consideration for the Proposed Project. The Proposed Project has therefore been designed to allow space for the future delivery of other projects.</p> <p>The Proposed Project is coordinating with other large scale infrastructure projects in Suffolk, noting that other Projects are outside the control of National Grid. National Grid has set out details of how the Proposed Project has coordinated with other projects as part of its DCO application. For further details, please refer to Application Document 7.10 Coordination Document.</p>	Under discussion
3.15.12	Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	<p>Traffic and Transport Assessment:</p> <p>Construction traffic routes</p>	<p>The Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are detailed in 11.125 of SCC's LIR [REP1-130] and include:</p> <ul style="list-style-type: none"> • B1121: A12 Benhall to A12 Dorleys Corner (S-RJ6, S-RJ7; S-RL5, S-RL6) • B1121: from Benhall to A1094 Friston (S-RJ8, S-RL8) • B1121 – Benhall Rail Bridge • The preferred access route to the converter station site via the B1121 on communities to the south of Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield. • The centre of Saxmundham that is constrained by a historic crossroad layout. • B1121 through Sternfield to Friston which has pinch points and bends. 	<p>Key principles guiding route selection included minimising use of sensitive or constrained roads, avoiding residential areas where possible; and limiting abnormal loads to carefully managed routes.</p> <p>The specific locations addressed by SCC are considered as follows:</p> <p>B1121 (South of Saxmundham, Benhall, Sternfield):</p> <p>The B1121 Main Road to the north of the new access to the Saxmundham Converter Station will initially be used for environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access, avoiding routing through Saxmundham and nearby villages.</p> <p>Saxmundham Town Centre:</p> <p>Routing through the town centre will be avoided after the initial mobilisation phase (see above, this will be completed</p>	Under discussion

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			<ul style="list-style-type: none"> B1119: Saxmundham to Leiston (S-RL7): The landfall site which is constrained with regards to access as the surrounding roads are unsuitable for HGVs and AILs including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.A12 Seven Hills to Lowestoft (includes S-RJ1, S-RJ2, S-RJ3, SRJ4; S-RL1, S-RL-2, S-RL3, S-RL4) The A1094: A12 Farnham to Aldeburgh (includes S-RJ9, S-RJ10, S-RJ11, S-RJ14; SRL10, S0-RL11) due to the superimposing of SPR EA1N, EA2 and Sizewell C (non-HGV) traffic. B1069: A1094 Knodishall to Leiston (S-RJ13, S-RL12) B1122: Yoxford to Theberton, Leiston to Aldeburgh and Theberton to Leiston 	<p>early in the programme and limited in duration with up to 25 vehicles per day). The preferred western access route (Option 3) was selected following consultation feedback to avoid the northern and southern options that would have impacted the town more directly.</p> <p>B1121 through Sternfield to Friston:</p> <p>This route is not proposed for regular HGV use. Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] confirms that only light vehicles or monitoring traffic may use this route, and any use of constrained roads will be subject to further review with Highways Officers.</p> <p>Landfall Site and A1094 / B1122 Roundabout (Aldeburgh):</p> <p>The B1122 will only be used by Abnormal Loads under strict management as set out within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]. The A1094 / B1122 roundabout geometry was considered in the EA1N/EA2 examination, and the Applicant has committed to minimising general HGV traffic along this route (a maximum of 10 daily HGVs). Access to the landfall site will be limited and carefully managed.</p> <p>A1094 and Cumulative Impacts (SPR EA1N, EA2, Sizewell C):</p> <p>The Applicant recognises the cumulative pressures on the A1094. The traffic assessment includes embedded mitigation and coordination with other NSIPs. Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] will be refined in consultation with SCC Highways to ensure cumulative impacts are appropriately managed.</p>	
3.15.13	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	<p>Traffic and Transport Assessment:</p> <p>Construction traffic routes</p>	Routes such as the A12 and A1094 are subject to seasonal fluctuations due to events, tourism and agricultural activities which should be acknowledged in the assessment.	<p>The Applicant recognises that the A12 is a strategic corridor and that the A1094 serves as a key route to Aldeburgh and the Suffolk coast, with variable traffic flows influenced by tourism and local events for example. The baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and are considered to be appropriate for the purposes of the assessment work. For example, had higher baseline traffic flows been adopted to consider seasonal fluctuations during the summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported and assessed for the majority of the assessment criteria in Application Document 6.2.2.7</p>	Under discussion

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				<p>Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], resulting in fewer potential impacts being identified (except for the assessment of Driver Delay – see below).</p> <p>In terms of road congestion and junction performance, the assessment of Driver Delay was informed by queue length surveys, and the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. In addition, the majority of seasonal traffic is likely to be less peaked, but instead expected to be spread across the day and to be less impactful during the typical network and shoulder peak hours. Nonetheless, following feedback received for the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]) by reviewing the potential outcome of increasing the sensitivity level of each junction to driver delay by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This results in seven junctions being assigned either a Very High or High sensitivity level for Driver Delay. The same conclusion is reached, that the likely impact of the Proposed Project on Driver Delay for all junctions within the study area is considered to be negligible or minor adverse (not significant) based on the increased sensitivity levels and small/negligible magnitudes of change identified for these junctions as a result of the Proposed Project.</p> <p>The assessment includes worst-case assumptions for construction traffic volumes, which provides a robust basis for impact evaluation by considering the busiest day of the construction programme. Therefore, whilst seasonal fluctuations in baseline traffic levels are acknowledged, the methodology adopted for the assessment work is considered to be robust by adopting peak construction traffic levels, rather than average or seasonal construction traffic levels which would be lower.</p>	
3.15.14	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p>	<p>Traffic and Transport Assessment:</p> <p>School bus routes</p>	The Consultee requests that school bus routes are also considered when reviewing the public transport network as these routes would be sensitive to road closures and cumulative transport impacts.	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and 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], includes a summary of the main bus services within the study area. No road closures are planned as part of the proposals other than to accommodate abnormal loads, works at Benhall Bridge or the construction of bellmouths if required. Bus Route 521 would continue to operate when works are being carried out at Benhall Bridge,</p>	Under discussion

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				as set out in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] . Therefore, school bus routes are not expected to be impacted by the Proposed Project.	
3.15.15	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	Traffic and Transport Assessment: HGV movements	The Consultee requires assumptions relating to HGV movements and worker numbers and profiles to be evidenced.	Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design (FEED) team based on the anticipated construction programme and construction activities at each access point. These have been split down by vehicle type (HGVs, LGVs and staff vehicles) for each individual day of the construction programme to allow peak forecasts to be identified, including for the single busiest day of the construction programme. There are almost 500 individual construction activities in total which have been separated by access point, with anticipated start and end dates for each activity, allowing total vehicle movements to be allocated across individual days across the programme based on the anticipated duration of each activity. The assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is based on the peak construction phase and the assumptions set out in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] relating to trip generation and trip distribution are robust.	Under discussion
3.15.16	N/A	Traffic and Transport Assessment: Assessment study area	<p>In view of the volumes of vehicle movements from cumulative schemes alongside Sea Link, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. The Council notes that there are junctions on the A12 under stress due to capacity particularly from the A12/A1152 Woods Lane Junction, Melton to the A12/A14 Seven Hills Interchange. To the north, the A12/A144, A12/A145 and A12/A1095 junctions have been areas of concern where capacity constraints while within acceptable flows may experience delays on side roads causing safety issues.</p> <p>SCC has detailed its views on junctions and roads affected by the project which are outside the study area in chapter 11 of its LIR [REP1-130] such as paragraph 11.125. SCC is particularly concerned about the cumulative pressures on traffic and transport receptors which have not been assessed due to being outside the Applicant's study area despite being impacted by the Proposed Development.</p>	<p>Noted. The proposed study area for the traffic surveys and assessment within the ES was agreed with SCC as part of the transport thematic meetings. There are not expected to be significant construction worker movements on the corridors identified, including through Snape and Tunstall. This is demonstrated within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] which does not identify any significant effects on the highway network during the construction phase (based on peak construction traffic movements) with the proposed embedded mitigation and control and management measures in place. Construction workers are expected to travel to/ from the Proposed Project via the A12 to the north and south of the study area, rather than via the longer and more convoluted route through Snape and Tunstall via the B1078 and B1069 for example.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

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3.15.17	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>	<p>Traffic and Transport Assessment:</p> <p>Assessment Methodology/ Receptors/ Sensitivity Levels</p>	<p>The Consultee suggests that sensitivity levels should be based on data/ evidence rather than professional judgement where possible.</p> <p>Where assumptions are made with assessments, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, and assumptions made for the sensitivity of receptors. The Council is concerned that the threshold for the sensitivity in a number of topics is set at a high bar and hence mitigation not considered necessary.</p> <p>Traditional assessments for DCOs such as the IEMA guidance are useful tool for assessing the construction traffic impacts albeit the focus is on regionally significant impacts. As a result, the fine detail of local impacts such as the small communities in Suffolk can, in SCC's opinion, be lost. At previous consultation stages the Council raised the use of this method as problematic given that it can often fail to fully assess the specific transport-related impacts of development. The IEMA guidance is one method of analysing the impacts in terms of risks to receptors. However, it is considered to be a coarse tool which does not sufficiently allow for factors such as junction geometry, design guidance (e.g. and most importantly the changes in traffic and driver behaviour.</p> <p>Assumptions made for strategic roads considered in the Design Manual for Roads and Bridges may also not be applicable to local roads which will not have been designed to such standards and are unlikely to have facilities for pedestrians found on such roads. SCC consider this has been the case with the Sea Link assessment where sections of road have been treated as uniform when there are significant differences in sensitivity. This impact can have a major impact on such small communities. An example would be the B1121 from the A12 south of Benhall to the A12 at Dorleys Corner. This, in SCC's opinion, forms a number of discrete sections. Other locations where SCC's opinion differs with regard to sensitivity tends to be the small settlements on B roads, for example Benhall, Sternfield, Kelsale cum Carlton, Friston, and Knodishall.</p>	<p>SCC's comments on the assessment methodology and sensitivity levels assigned to receptors are acknowledged by the Applicant. Sensitivity levels have been based on data where possible (e.g. collision data for Road Safety and queue length surveys for Driver Delay) and supported by (rather than relying on) professional judgement where necessary. Further details are provided below as requested.</p> <p>The assessment work within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] follows the 2023 Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement, which is considered to be appropriate for informing the methodology and sensitivity levels derived. Five different Tables to categorise sensitivity levels across the receptors within the study area have been identified, using quantifiable criteria where possible. This has resulted in a range of sensitivity levels being assigned including Medium and High for the most sensitive receptors and assessments. Therefore, this is considered to offer both a reasonable and proportional approach to the eight categories of assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], which considers 13 road links, 14 junctions and 17 Public Rights of Way (PRoW) and four walking/ cycling routes, within the agreed study area.</p> <p>Further to the above, the approach taken for identifying road link receptors and assessing impacts on severance, pedestrian delay, non-motorised user amenity and fear & intimidation is considered to be consistent with the approach taken by SPR within the EA1N/ EA2 ES'. For example, a similar number of links have been assessed, for similar lengths between key junctions. Furthermore, the sensitivity levels assigned for road links within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] for the aforementioned assessments is largely comparable to those adopted for Sizewell C and EA1N/ EA2. Whilst some receptors have been assigned lower levels of sensitivity, the majority are of a similar level and some receptors have conversely been assigned higher levels of sensitivity. The study areas are also different, which influences the extents and characteristics of the links included, particularly for the A12. In addition, Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] assesses the potential impacts of the Proposed Project on severance, pedestrian delay, non-motorised user amenity and fear & intimidation at road junctions, whereas the other DCOs do not appear to. The Applicant welcomes further discussions with SCC with</p>	Under discussion

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				<p>respect to the assessment methodology if necessary, which is considered to be robust.</p> <p>The sensitivity of receptors for Road Safety was based on Personal Injury Accident data obtained from SCC for the most recent five-year period (at the time of the assessment), which includes all user types including vulnerable users. The Applicant highlights that the collision record presented by SCC within their LIR is representative of that presented within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. The assessment of Road Safety was also based on the worst-case scenario; the single busiest day of the construction programme in terms of construction traffic levels and no significant effects were identified.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.15.18	N/A	<p>Traffic and Transport Assessment:</p> <p>Construction traffic access routes for construction of River Fromus bridge and haul road</p>	The Council requests clarity on the feasibility of constructing the River Fromus bridge and the haul road without substantial vehicle movements going through Saxmundham and using the B1119. It is not clear to the Council how the Applicant would access the east bank of the river without using these routes during construction of the bridge and haul road.	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG	Under discussion
3.15.19	N/A	<p>Traffic and Transport Assessment:</p> <p>Junction modelling</p>	<p>The Council considers there to be a need for junction modelling to adequately assess the project's impacts particularly for the purposes of assessing delay. This point is also relevant where junctions are impacted by cumulative schemes.</p> <p>It is noted that the Applicant has only assessed delay at junctions in terms of the IEMA guidance, not through modelling. A concern with the Applicant's assessment is that by only considering delay at two or more limbs this creates a situation where impacts will only be noticeable at crossroads and not where the main route is not constrained by the need to give way.</p>	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG	Under discussion
3.15.20	Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	<p>Traffic and Transport Assessment:</p> <p>Scope of assessment</p>	The Consultee noted that the B1122 from Yoxford through Leiston to the B1353 at Aldringham is not included as a road link (paragraph 2.8.6.3 of the PEI Report)	Noted, the main access routes for the Proposed Project during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are anticipated to accommodate circa 97% of all construction vehicle trips associated with the Proposed Project. The overall routing strategy is designed to minimise construction vehicles along alternative less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston). The B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by cable drum	Under discussion

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				abnormal vehicles under careful management 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] . Otherwise, this route will not be used by HGVs to avoid construction traffic passing through Leiston and Coldfair Green and the Proposed Project is not therefore expected to have any impacts on this route.	
3.15.21	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	Traffic and Transport Assessment: Assessment Methodology/ Collision Data/ Rates	The Consultee challenged the approach taken for calculating collision rates in Table 2.0.24 of the PEI Report (e.g. collision data, description of links and road types)	Collision rates have been calculated based on the traffic flows derived from the 2024 traffic surveys and the number of collisions which occurred along each road link based on the Personal Injury Accident (PIA) data obtained from SCC. The collision rates have been calculated in billion vehicle miles for road links to provide a comparison with national road safety statistics provided within Road Casualties Great Britain (Department for Transport, 2024). Further details of the road links including their locations, number of recorded collisions, baseline traffic flows (2024 AADT), lengths (in miles) and road types (e.g. rural or urban) have been provided to inform this exercise, including the supporting calculations to derive the collision rates. A High level of sensitivity was assigned to several road link receptors, informed by the collision rates, to provide a robust approach to the assessment. Further details of the methodology are contained within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] . The Applicant also highlights that the collision record presented by SCC within their LIR is representative of that presented within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] .	Under discussion
3.15.22	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	Traffic and Transport Assessment: Assessment Methodology - Scenarios/ Peak Periods	The Consultee recommends flexibility regarding the assessment year in case the project programme changes	Noted, Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] assesses the peak construction phase which now represents 2028 based on the current construction programme and the highest total annual forecast construction traffic movements.	Under Discussion
3.15.23	Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Traffic and Transport Assessment: Average vehicle occupancy factor	The Consultee requests further evidence to support the proposed car occupancy figure for construction staff, or the occupancy level should be reduced Data from similar projects in Suffolk suggests a car share occupancy of 1.5 is optimistic.	An average vehicle occupancy factor of 1.5 construction workers per vehicle has been adopted for the site-based construction staff, which is considered to be reasonable, yet robust, given that all staff have been assumed to travel by vehicle (rather than other modes) and that a formal Car Share Scheme will be implemented to match potential car sharers. This therefore represents a lower occupancy figure than the original factor (2.0) as requested by SCC. Further details are provided below in support of this approach. Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Under discussion

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				<p>includes measures to encourage construction workers to travel by alternative means to the single occupancy vehicle where possible. A Car Share Scheme will be implemented and managed by the Transport Co-ordinator, to match potential car sharers and to help staff identify any colleagues who could potentially be collected along their route to/from the Site. The car share database will be available to staff that have signed up, to allow them to identify their own potential matches. Car sharing staff will be given preferential parking provision as an incentive to reduce single occupancy (and therefore overall) car travel to the construction compounds. Therefore, it is considered that the occupancy value of 1.5 is achievable with these measures in place. It should also be highlighted that the assessment carried out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] offers a robust approach as it has been assumed that all staff would travel by car (rather than other modes). Therefore, the average vehicle occupancy factor of 1.5 construction workers per vehicle is considered to be robust on this basis.</p> <p>In addition to the above, Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] includes an internal minibus service as a measure to transfer workers around the site and to reduce vehicle trips on the surrounding highway network. There would be the opportunity for this to also transfer construction workers to and from Saxmundham railway station, which is located a circa 1.2km walking distance to the north of the proposed site access (S-BM09) on the B1121 Main Road. This would both encourage and increase the viability of rail travel amongst construction workers, reducing vehicle trips on the surrounding highway network. Again, this demonstrates that the approach taken in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is robust, given that all staff have been assumed to travel by car as part of the assessment work.</p>	
3.15.24	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]	Traffic and Transport Assessment: Proportional change in HGV movements	The Consultee requests that proportional change in HGV movements is also considered as part of the assessment work (e.g. when the 30% threshold is applied to determine magnitudes of impact based on proportional increases in traffic levels)	Agreed, the proportional change in HGV movements is considered in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] for the applicable assessment criteria.	Under discussion
3.15.25	N/A	Traffic and Transport Assessment: Driver delay from TTM	The Consultee suggests that driver delay could also arise as a result of Temporary Traffic Management (TTM) which should be considered	Noted, although the exact form of TTM is unknown at this stage. Further details will be included within the Detailed CTMTP when this is prepared.	Under discussion
3.15.26	Application Document 6.2.2.7 Part 2 Suffolk	Traffic and Transport Assessment:	The Consultee requests that horse riders are also considered, both as users of the road network and	Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] includes an assessment	Under discussion

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	<p>Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>	Assessment Methodology - Walking, Cycling and Horse-Riding	public bridleways of which there are several within the sites and preference areas	of PRow diversions and closures including bridleways. Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] sets out measures to manage PRow through the construction and operational phases of the Proposed Project, as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027] .	
3.15.27	<p>Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p>	<p>Traffic and Transport Assessment:</p> <p>Public Rights of Way</p>	<p>The Consultee expects the construction of the cable route to affect the Sandlings Walk in several places, as well as other connected footpaths.</p> <p>The Council supports Sandling Way now being included.</p>	Sandlings Walk has been included in the assessment of national/ regional walking and cycling routes in Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] . The likely impact of the Proposed Project on Severance, Pedestrian Delay, Non-Motorised User Amenity and Fear & Intimidation for Sandlings Walk (as well as other walking routes) as a result of construction traffic is considered to be not significant based on the assessment criteria. The section of Sandlings Walk which runs along a bridleway (PRow E-354/002/0) has also been assessed within Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and measures relating to PRow E-354/002/0 are set out within 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] .	Agreed
3.15.28	<p>Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note</p>	<p>Traffic and Transport Assessment:</p> <p>Assessment Methodology - General</p>	The Consultee requests that the assessment methodology for environmental effects, as set out in the Sizewell C Project 'Fourth Environmental Statement Addendum' [REP7-030] and [REP7-032], including categorisation of links and magnitude of impacts, should be considered.	The assessment methodology for environmental effects within Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] follows best practice guidance from the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement.	Under discussion
3.15.29	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	<p>Development Consent Order:</p> <p>Extended working hours and HGV delivery hours</p>	<p>As Local Highway Authority ("LHA"), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on roads used for recreational purposes and the uninterrupted impacts on local communities. The application appears conflicted stating that HGV deliveries will not be permitted on Sundays and Bank Holidays but then placing a limit of 30 HGV movements for a list of allowable construction activities.</p> <p>The Council has set out its objections to the proposed core working hours, including timings of HGV movements, and the Applicant's justification of its</p>	The Applicant has proposed core construction working hours of 07:00 to 19:00hrs Monday to Friday, and 07:00 to 17:00hrs on Saturdays, Sundays, and Bank Holidays. While this includes weekends and holidays, the application clarifies that construction activity is not expected to occur on every Sunday or Bank Holiday. Importantly, restrictions are in place to limit the type and scale of activity during these periods, including a cap of 30 HGV movements per day on Sundays and Bank Holidays and limitations on percussive piling. These restrictions are further detailed in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 .	Under discussion

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			position, in its representations submitted into the examination [REP1-130] [REP2-062].	The Applicant has justified the inclusion of extended working hours as necessary to maintain programme flexibility and meet the Government's Clean Energy Action Plan targets. The inclusion of limiting HGV movements on Sundays and Bank Holidays is not intended to contradict the general restriction but rather to allow for essential, low-impact activities that support the overall delivery schedule. The Traffic and Transport assessments, including those in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] , have considered these extended hours and associated vehicle movements. The assessments conclude that, with the proposed mitigation, no significant adverse effects are anticipated. Nonetheless, the Applicant has committed to ongoing dialogue with the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination.	
3.15.30	Application Document 3.1 (E) draft Development Consent Order [CR1-027] Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Development Consent Order: Pre-commencement activities	Pre-commencement activities as defined within the Order fall outside the remit of the Construction Traffic Management and Travel Plan (“CTM&TP”) and are therefore not managed. This has been a problem with other NSIPs in the delivery phase. If the Applicant intends that the control documents specified in Requirement 6 of Schedule 3 to the draft DCO should be applicable to pre-commencement operations, the wording of Requirement 6 will need to be amended to achieve this. As currently worded, it only restricts activities which would ‘commence’ the authorised development, but the term ‘commence’ is defined in the DCO so as to exclude all pre-commencement operations.	The Applicant confirms that pre-construction activities will be managed with the same environmental and traffic controls as those applied during construction, secured through the draft DCO, specifically Requirement 6 in Schedule 3 (Application Document 3.1 (E) draft Development Consent Order [CR1-027]). This is to ensure any pre-commencement operations must adhere to the final versions of the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127] and Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] . Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] sets out clear measures to manage HGV movements during construction, which avoids sensitive areas such as Grove Road. Additionally, the Plan imposes strict caps on HGV movements on Sundays and Bank Holidays, limiting them to a maximum of 30 vehicles per day. The term “workers” primarily refers to construction personnel, where the working hours are clearly defined in the DCO (Requirement 7) of Monday–Friday: 07:00–19:00hrs, and Weekends and Bank Holidays: 07:00–17:00hrs. It is expected that all visitors to Site will be involved in construction in some way. Monitoring and enforcement are embedded through: <ul style="list-style-type: none">• Application Document 9.83 Code of Construction Practice submitted at Deadline 3 and Application Document 7.5.3 Outline Onshore Construction Environmental	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>Management Plan [APP- 340] superseded by [AS-127]; and</p> <ul style="list-style-type: none"> • Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 which outlines all mitigation measures and assigns responsibility for implementation and monitoring. <p>Contractors will be required to develop task-specific Management Plans and report regularly to SCC.</p> <p>Requirement 5(3) already states all pre-commencement operations must be carried out in accordance with both the plans listed in paragraph 5(2), the outline management plans listed in paragraph 6(1) and the outline overarching written schemes of investigation listed in paragraph 14(1). We therefore don't consider it is necessary to update Requirement 6.</p>	
3.15.31	N/A	Development Consent Order: The New Roads and Street Works Act 1991	The Council is concerned by the disapplication of the New Roads and Street Works Act 1991 and considers that it should not be disapplied.	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG	Under discussion
3.15.32	N/A	Development Consent Order: Traffic Regulation Orders	<p>The application includes proposals for traffic regulation orders, including prohibiting vehicles on roads including B class ones. It is unclear over what duration this will be required and hence what the impacts on the road users, communities and other NSIPs will be. The Council would require robust justification before it can accept such restrictions. The principles stated by the Applicant do not appear to be included in the Outline CTMTP.</p> <p>The Council understands this Examination to serve as the consultation for the proposed Traffic Regulation Orders. The Applicant should therefore undertake meaningful and effective consultation with affected parties at this stage.</p> <p>Impacts cause by road diversions and closures from TROs and temporary traffic management measures should be assessed. SCC has particular concern over the impacts of such measures in relation to the B1119 and B1121.</p>	<p>Where Traffic Regulation Orders (TROs) are required, the following principles apply:</p> <ul style="list-style-type: none"> • Short-term closures (1–5 days) may be needed for safety-related works (such as scaffolding for overhead lines); • Local diversions may last up to four weeks depending on the activity; • Full construction-phase restrictions will only be used if essential and subject to consultation with SCC Highways. <p>Durations are indicative and will be confirmed in the Detailed CTMTP, to be agreed with SCC Highways. TROs are assessed based on the safety for workers and the public, minimising disruption to communities and businesses and avoiding cumulative impacts with other NSIPs (such as Sizewell C, EA1N/EA2).</p> <p>For restrictions on B-class roads, these restrictions are limited in scope (for example abnormal loads only), carefully managed (such as escorted, off-peak scheduling) and avoided or minimised where alternatives exist (including the B1122 where HGV levels will be minimised).</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>The Applicant is committed to continued engagement with SCC Highways to agree TROs, coordinate with other NSIPs to share closures where possible and communicate clearly with communities ahead of any restrictions.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG</p>	
3.15.33	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p>	<p>Construction Traffic Management and Travel Plan:</p> <p>Emergency access</p>	<p>The Council has a concern that the additional traffic and works on the network may compromise emergency access to Sizewell B due to the proposed restrictions on vehicles but also the cumulative impacts of traffic and roadworks from all NSIPs.</p> <p>The application (such as in [APP-234]) shows the B1119 to be an HGV route which presents challenges to keeping the road available to emergency services without delay given the general unsuitability of the road for HGV movements without road improvements. The Council has a statutory duty to ensure emergency services are able to use the B1119 without delay and so must have certainty on this matter which has not yet been provided.</p>	<p>The B1119 Saxmundham Road, a key route for emergency access to Sizewell B, will remain open to emergency services at all times. Works within the B1119 will be limited to new utility connections and environmental mitigation, which will be undertaken offline from the carriageway. Additional construction traffic along the B1119 Church Hill will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages.</p> <p>A full cumulative traffic impact assessment has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], including Sizewell C, LionLink, and SPR projects. The assessment concludes no significant cumulative effects on Traffic and Transport receptors. Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] includes defined construction routes and traffic control measures to reduce the potential impacts of construction traffic associated with the Proposed Project.</p> <p>The Applicant is considering the further comments from SCC and will discuss with SCC and update their position in the next version of the SoCG.</p>	Under discussion
3.15.34	Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Construction Traffic Management and Travel Plan	The CTM&TP in the Council's view lacks rigorous controls on HGV routing and a cap on numbers in line with what is assumed in the assessments and has been accepted in previous DCO consents. Nor is there a commitment that can be enforced in terms of workers shift patterns that form part of the embedded mitigation. It is unclear if the definition of 'workers' includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	Under discussion

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3.15.35	<p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p>	<p>Construction Traffic Management and Travel Plan: HGV details within CTM&TP</p>	<p>The Consultee states that the CTMTP should include details of HGV routing and numbers, travel planning measures and staff vehicle numbers.</p>	<p>Agreed, these details are included in 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].</p>	Under discussion
3.15.36	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>	<p>Construction Traffic Management and Travel Plan: Worker Shift Patterns</p>	<p>The Consultee suggests that worker shift patterns (to spread traffic demand and avoid network peaks), worker movements and maximum HGV movements are secured in the CTMP. LHA considers that the realistic worst case transport scenarios presented by the Applicant should be secured through caps within the CTMP as EN-1 5.14.14.</p>	<p>Details of worker shift patterns, worker movements and peak HGV movements are set out within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]. The Applicant is considering the Council's request to include caps on maximum HGV movements within the CTMTP. It is anticipated that the measures set out within this document would be developed into a Detailed CTMTP and secured through Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027].</p>	Under discussion
3.15.37	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>	<p>Construction Traffic Management and Travel Plan: Monitoring and compliance</p>	<p>The Consultee requires details of what actions will be taken to ensure compliance with the CTMP.</p> <p>There should also be sufficient provision for monitoring and regular reporting of controls to the relevant highway authority.</p>	<p>Section 8 of 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], provides a summary of the mechanisms that will be implemented to ensure compliance with the document.</p>	Under Discussion
3.15.38	N/A	AIL movements, including special order routes	<p>AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special Order weight restriction.</p> <p>The Council considers that the surveying and planning referenced by the Applicant should be undertaken prior to DCO consent. Not doing so poses a potentially significant risk to the project's timely delivery should it be discovered that no AIL special order routes are feasible on account of structures discovered to be unsuitable for such loads. At worst, these delays could cause various materially new or different effects to those reported in the ES to arise due to elongated</p>	<p>While the ESDAL notification system is acknowledged and will be accessed, the Applicant is not relying solely on it to plan AIL movements. Instead, they are:</p> <ul style="list-style-type: none"> proactively engaging with SCC Highways. surveying and planning AIL routes in advance; and committing to further detailed assessments during the construction phase. The draft DCO includes flexibility to: use alternative routes if required; implement temporary works to enable safe AIL movements; and 	Under discussion

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			<p>durations of impact and delays to restoration and mitigation measures.</p> <p>The Council's concerns around AILs are set out in detail in paragraphs 11.137 to 11.151 of [REP1-130].</p> <p>The Applicant should seek to implement resilient routes beyond the construction phase for AIL movements in the context of other nearby projects also requiring long-term access for AILs.</p>	<ul style="list-style-type: none"> coordinate with other NSIPs to avoid cumulative disruption. <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.15.39	<p>Sea Link DCO notification of change to DCO application [AS-138]</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p>	<p>AIL & construction traffic routes:</p> <p>Benhall Railway Bridge</p>	<p>The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits. Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. With the current restrictions this route would not be resilient for long term access to the Saxmundham converter station site and the Council considers there are serious concerns regarding deliverability.</p> <p>As currently designed, this bridge would form critical infrastructure to deliver Sea Link, and potentially LionLink. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.</p> <p>SCC has set out its concerns on this matter in response to the Applicant's position in Table 5A of [REP2-062]. These concerns include the lack of assessment regarding the 'mini-bridge' option, the lack of detail given on the feasibility of this option and how it would be delivered.</p> <p>Specifically for the closure of the B1121 at the Benhall Rail Bridge, diverted traffic would likely impact the B1119/B1121 signalised crossroads in Saxmundham and the A12/B1119 Rendham junction. The diversion of</p>	<p>The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs).</p> <p>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 to plan for the movement of AILs.</p> <p>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>However, the Applicant has had a number of positive discussions with SCC since the submission of the DCO application regarding possible methodologies for the strengthening of the Benhall Railway Bridge, if (following detailed assessment) this is necessary.</p> <p>The Applicant submitted a notification of proposed changes (Sea Link DCO notification of change to DCO application [AS-138]), which included additional land within the Order Limits at the Benhall Railway Bridge, to the ExA and has recently submitted a Change Request at Deadline 1A. On 6 December 2025 this Change Request was accepted into the examination.</p> <p>The Applicant has undertaken consultation with key stakeholders on this change to further advance discussions on the most appropriate methodology to employ, if necessary.</p> <p>These methodologies include the installation of a 'mini-bridge', which could be assembled and moved into place within the highway boundary under a weekend road closure. There also remains the option to permanently upgrade the bridge itself. The inclusion of the highway itself within the</p>	Under discussion

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			<p>traffic from cumulative schemes should also be considered.</p> <p>The B1119/B1121 Mill Lane 4-way traffic lights in the centre of Saxmundham – over capacity already at peaks, will be even worse with diversion route, not anything you can do without knocking windows down. There is also a safety concern in relation to the Primary School on Brook Lane in terms of students crossing the road to get to school.</p> <p>The Applicant has provided an Assessment for Approval in Principle for Benhall Rail Bridge. Due to restricted in-house resources SCC is required to commission a term maintenance contractor assist in the approval of this assessment and will incur costs doing so. SCC cannot progress this until agreement is reached regarding funding this work.</p> <p>The Council has provided further detail on its views on this matter in chapter 11 of [REP1-130]. Notably, the Council considers that there has been insufficient exploration and consideration of alternative solutions to access the site which do not use the B1121. The Council is also concerned with the lack of provision in the order limits for alternative solutions for the proposed access route, such as the construction of a new bridge, should the Applicant's proposed solutions be deemed unfeasible during delivery or should a new bridge be considered the least impactful solution.</p> <p>There is a lack of detail on the feasibility of the option to repair the bridge both in terms of the order limits being sufficient to facilitate the extent of the works, ancillary facilities including site accommodation and welfare and the impacts of those works. Engagement with a contractor should be sought to demonstrate the feasibility and likely impacts of these works.</p>	<p>Order Limits would provide greater clarity over the consenting route for any such roadworks.</p> <p>Whichever bridge strengthening methodology is used, suitable Temporary Traffic 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>Application Document 7.5.1.1 (B) 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 during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. Once a preferred and agreed option has been identified for transporting AILs, this report will be updated accordingly with any additional construction traffic management measures required to alleviate concerns.</p> <p>The Applicant will as a matter of course engage with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions, including Network Rail.</p> <p>It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that even a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.15.40	<p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p>	Construction Vehicle Routing	The Consultee does not consider access for large or heavy vehicles through Saxmundham to be a viable option and is concerned about the likely impacts of increased traffic and disruption on communities to the south of Saxmundham.	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] . 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	Under discussion

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				<p>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 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.</p>	
3.15.41	Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]	Walking/ Cycling Route Enhancements	The Consultee suggests that enhancements should be made to the PRow network, by creating footpaths and cycleways in tandem with biodiversity enhancements. Sufficient land should also be retained within the Order Limits to secure PRow-related measures. It is acknowledged that mechanisms for community benefit approach can be secured later in the process but this cannot act as a substitute for the Council's requested enhancement to offset the project's impacts.	<p>National Grid supports the delivery of community benefits associated with transmission infrastructure (National Grid already has established programmes which deliver this) and will investigate the potential to provide a contribution towards a community/ legacy fund for PRow improvements. For example, National Grid operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. National Grid supports this and believes it should be flexible, allowing community benefits to respond to local and regional needs. Whilst awaiting clarity on the government's position, National Grid is working to understand local and regional aspirations and priorities in relation to community benefits. National Grid welcomes the suggestions for delivering community benefits and will work with stakeholders and local communities to further inform this as the Proposed Project progresses.</p> <p>In addition to the above, masterplanning is being undertaken in order to ensure effective coordination takes place with regard to the impacts on PRow. For example, the Order Limits in the vicinity of Saxmundham Converter Station is crossed by two PRow running north-south (PRow E-491/005/0) and east-west (PRow E-491/006/0). Whilst PRow diversions are required, these have been designed and co-ordinated with other projects in this area (e.g. Lion Link) to minimise additional journey distances, re-join existing routes and improve route connectivity. The permanent diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to fully consider the long-term future of the site and to avoid the need for subsequent diversions.</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 Change Request</p>	Under discussion

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				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. Whilst Change 5 allows more space along this strip of land to the south of the B1119, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this.	
3.15.42	N/A	FEED - Road Safety Audits (RSA)	The Council requires a Road Safety Audit for access designs in accordance with the Council's guidance	The RSA Stage 1 briefs were issued to SCC Highways on 9 December 2024, with the Consultee providing feedback on 6 January 2025, accepting National Grid's proposed auditors, but requested some revisions to the audit briefs and supporting information. National Grid reissued the briefs and requested acceptance from the Consultee, however, a response has not yet been received to date. The preliminary design will subsequently be revised (where necessary) based on the Designer's Response to the Stage 1 RSA. The highway improvements will be secured by the DCO, and further details of the works required to deliver the improvements will be provided in the Detailed CTMTP.	Under discussion
3.15.43	Application Document 2.13 Design and Layout Plans [APP-037]	FEED - Access Layouts	<p>The Consultee requests that bellmouth drawings show visibility splays (based on speed surveys and 's visibility guidance to reduce hedgerow impacts), forward visibility to traffic signals and consider characteristics of each location (rather than a generic design) including highway boundary info, topographic data, Order limits and swept paths</p> <p>Site specific designs are required. High level illustrative plans are not sufficient.</p>	<p>The Applicant has worked with SCC (Highways) to agree the locations and geometry of the proposed access points, including undertaking Road Safety Audits at Stage 1 for preliminary designs. The location of accesses has been driven by safety, specifically considering visibility at the access locations, along with the need to access the project along its alignment. The Applicant has included proposals for vegetation removal and management at access points to ensure the project can provide the visibility required at the proposed accesses and this has been a specific focus of SCC (Highways) throughout the project development. However, the access designs are preliminary, and the Applicant is willing to work with SCC (Highways) and SCC (Landscape) to look for opportunities to minimise the impact on vegetation through the appropriate use of traffic management and other mitigations.</p> <p>Visibility splays are shown on the bellmouth layouts in Application Document 2.13.1 Design and Layout Plans – Suffolk [APP-037].</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG</p>	Under discussion
3.15.44	Application Document 2.13 Design and Layout Plans [APP-037]	FEED - Construction Methodology	The Consultee prefers trenchless crossings of the public highway and suggests that it is not usually feasible to trench across a road less than 7.4m in width under two-way traffic control	Trenchless crossings will be utilised where viable e.g. the landfall will be completed via trenchless techniques so only light vehicle access is required for monitoring purposes. Where roads are narrower than 7.4 m it is proposed to have road closures and local diversions to undertake the works.	Under discussion

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	<p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) 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>These can be programmed to minimise impacts and will be discussed further with the local highways authority. This has been set out within the REAC (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3) as well as the oCMTP (Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]).</p>	
3.15.45	Application Document 2.13.1 Design and Layout Plans – Suffolk [APP-037]	Access and crossing points	<p>The Consultee requires further details of access tracks and crossing points to show these are safe to use with suitable length and width to allow two vehicles to pass</p> <p>Clarity should be provided on the process for gaining technical approval for access designs under section 278 of the Highways Act which is separate from the discharge of requirements process.</p>	<p>These details are provided within the bellmouth drawings (Application Document 2.13.1 Design and Layout Plans – Suffolk [APP-037]) which have been supplied as part of the DCO. The RSA Stage 1 briefs were issued to SCC Highways on 9 December 2024, with the Consultee providing feedback on 6 January 2025, accepting National Grid's proposed auditors, but requested some revisions to the audit briefs and supporting information. National Grid reissued the briefs and requested acceptance from the Consultee, however, a response has not yet been received to date. The highway improvements will be secured by the DCO, and further details of the works required to deliver the improvements will be provided in the Detailed CTMTP.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG</p>	Under discussion
3.15.46	N/A	Cost recovery	The Council requires adequate cost recovery in relation to highways costs incurred as a result of the project	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG	Under discussion
3.15.47	<p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p>	Vehicular movements during construction of Friston substation	The Council considers that detailed information is required regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.	<p>Construction Access Strategy</p> <p>All construction traffic for Friston Substation will use a dedicated haul road from Snape Road (B1069), avoiding the B1121 through Friston village. The B1121 will only be used for minor works to existing overhead line towers, requiring minimal vehicle access.</p> <p>Coordination with SPR Projects</p> <p>The Friston Substation is included in the Proposed Project DCO to ensure a comprehensive consenting position. However, in Scenario 1 assessed in the EIA and reported on in the ES, it is expected to be implemented by SPR under their existing DCOs (EA1N and EA2). If SPR does not proceed, the Applicant will construct the substation under Scenario 2 using the same access and mitigation measures.</p> <p>Traffic Forecasts and Management</p> <p>Construction traffic forecasts for Friston Substation have been included in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] to</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>ensure a robust assessment. If SPR constructs the substation, the actual traffic from the Proposed Project will be less than assessed. Traffic management measures are detailed in Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]</p> <p>Cumulative Impact Assessment</p> <p>Cumulative traffic impacts with SPR, Sizewell C, LionLink, and other NSIPs are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].</p>	

3.16 Public Rights of Way

Table 3.16 Public Rights of Way

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.16.1	N/A	Assessment of PRow	<p>The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRow to be clearly interpreted by the public.</p> <p>SCC has asked for this in all correspondence, and it is contained in SCC’s NSIP guidance. The examples of previous projects cited by the Applicant does not mean that the approach is best practice. It is understood that the DMRB and other guidance may not yet request the assessment of PRow to be its own ES chapter.</p> <p>However, a separate chapter would allow the assessment and its findings to be communicated with far greater clarity than the current sporadic approach spanning many documents allows. By consequence, IPs would be able to participate more effectively in this regard through improved accessibility to the assessment and its findings. This point not only applies to local authorities and other organisations registered as IPs but is also especially pertinent to IPs registered as individuals, such as members of the public, who already face barriers to effective engagement on account of the large quantity of technical documents forming the application and the amount of time needed to do so.</p> <p>The Council recognises that the Applicant has produced a document setting out its approach to assessing PRow in [REP1-111]. This document refers to application documents assessing PRow but does not provide the detail of these assessments and their conclusions. As such, SCC’s concerns around lack of transparency and accessibility of the assessment of PRow remains.</p> <p>A separate PRow ES chapter would also ensure that PRow are assessed in a way which accurately reflects their use including the differences in use compared to the rest of the highway network. PRow serve purposes which go beyond purely transporting users, such as through being vital pieces of social infrastructure. These social functions are distinct from those which can be associated with other</p>	<p>It is the Applicant’s view that the structure of the ES as submitted follows established practice in EIA, allowing for a full assessment of all potential impacts on PRow where there is the potential for significant environmental effects.</p> <p>It is not conventional practice for an ES to have a standalone PRow assessment reported within its own ES topic chapter, nor is the Applicant aware of any best practice guidance which recommends that a separate PRow ES chapter should be produced. It is noted that most other local consented DCO schemes in Suffolk such as East Anglia ONE, East Anglia TWO, East Anglia ONE North and Bramford to Twinstead Reinforcement, also adopted a similar approach to the Proposed Project in their EIAs. Furthermore, other recent EIAs submitted nationally for consented DCO schemes adopt the same approach as the Proposed Project with no separate PRow ES chapter, including East Yorkshire Solar Farm, Viking Carbon Capture and Storage (CCS) Pipeline and the Tillbridge Solar Project to name a few.</p> <p>In terms of guidance, the Design Manual for Roads and Bridges (DMRB) sets out specific environmental topic assessment methodologies, and it is worth noting that there is not a separate one for considering PRow. Instead, consideration of PRow are an integral part of the other topic assessments, such as Landscape and Visual Effects (LA 107) (Standards for Highways, 2020) and Population and Human Health (LA 112) (Standards for Highways, 2020). ISEP (formally IEMA) guidance on ‘Environmental Assessment of Traffic and Movement’ (July 2023) (ISEP, 2023), provides practitioners with good practice advice on how to carry out the assessment of traffic and movement of people as part of statutory EIAs, which traffic and transport assessments follow. PRow users are considered as a particular receptor group to consider within the traffic and transport assessment, which addresses aspects such as pedestrian delay (including all non-motorised users), non-motorised user amenity and fear and intimidation.</p> <p>It is important for an EIA to remain proportional in approach and remain focused on assessing the likelihood of significant environmental effects, and by introducing a separate PRow ES chapter it would risk double counting of effects already being reported</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			<p>forms of highway. PRowS have unique status and qualities in comparison to the rest of the local highway network and so require a distinct assessment approach.</p> <p>The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRow user, they could then be significant.</p>	<p>somewhere else in the ES. SCC state their concern is that when considered individually, an impact might be assessed as not significant, but if the impacts had been considered collectively for that receptor, they could be significant. This is exactly the point of the intra-project effects assessment, which has considered the combined effects on PRow and their users, that have been identified across the various topic chapters. This intra-project (or in-combination) assessment is presented in Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative Effects [APP-059]. This intra-project cumulative effects assessment found that users of only one PRow were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.16.2	Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]	Construction Management Measures of PRow	<p>The Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRow network, especially during the construction period.</p> <p>The Council has not seen evidence demonstrating why it is not feasible to take this approach nor why it is necessary for the Applicant to divert routes instead. The Applicant's approach will be more impactful due to the effects prolonged closures and diversions have on user behaviour through disruption caused by long-term diversions which last throughout the construction phase and the repeated short-term diversions over a lengthy period especially in the context of cumulative schemes.</p>	<p>The Applicant acknowledges this feedback. Diversion routes have been identified where any temporary PRow closures will be required. These details are set out in Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]. It is proposed to temporarily divert several PRow during the construction phase. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. Short term temporary diversions will last four weeks, and long-term temporary diversions will be the full construction phase.</p> <p>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] outlines a comprehensive approach to managing controlled crossings, traffic marshals, and signage during the construction phase in Suffolk. Controlled crossings will be implemented where PRow intersect with temporary access tracks, using signage to alert both PRow users and construction vehicle drivers. At busy crossing points, traffic marshals (banksmen) may be deployed to assist users, ensuring safe passage and minimal disruption. Where marshals are not present, construction vehicle drivers will be responsible for temporarily closing and reopening gates to maintain separation between the public and construction vehicles. Signage will be strategically placed to inform users of construction activities, diversions, and closures, with</p>	Under discussion

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				<p>advance notice provided to prevent inconvenience. These signs will include contact details for the community relations team and be coordinated with SCC officers to ensure consistency and visibility across the Proposed Project area.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.16.3	Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]	<p>Space in the Order Limits for effective mitigation for diversions of PRow</p>	<p>The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation for diversions of public rights of way.</p> <p>For example, at the targeted consultation stage, a considerable amount of land was removed from the draft order limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.</p> <p>Areas of concern with insufficient space within the Order Limits include along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for NMUs.</p> <p>Any alternative provided PRow must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for NMUs to access local facilities and employment.</p> <p>The Council does not agree that provision in the Order Limits for the enhancement or creation of PRow routes is not necessary mitigation given the impacts caused by extensive closures and diversions in addition to the other impacts identified by the Applicant including significant intra-project cumulative effects</p>	<p>The Order Limits are sufficient to accommodate the PRow diversions and mitigation required. Further details are provided within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047].</p> <p>Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for PRow, landscape and ecological matters). The field to the north of the Saxmundham Converter Station was removed as the coordination strategy with LionLink became clearer. In terms of coordination, an adaptive landscape design approach is proposed whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts. Opportunities remain to be considered for providing permissive access within the mitigation landscape proposals surrounding the Saxmundham Converter Station site.</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, following further landowner feedback around the maintenance approach to the drain and discussions over who will maintain the planting, it has been decided to broaden the strip of land south of the B1119, with this change to the Order Limits proposed in the change to the DCO application (planned for submission included in the Change Request submitted in November 2025 which was accepted by the ExA on 5 December 2025). While this allows more space along</p>	Under discussion

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				<p>this strip, it should be noted that a permanent public right of way along this route is not identified as essential mitigation in the ES and therefore powers are not sought for this.</p> <p>This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] within the landscape design principles section and Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059].</p> <p>The permanent PRow diversion across the Saxmundham Converter Station site is acknowledged and is shown on Figure 1 Saxmundham Converter Station Outline Landscape Mitigation (Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348] superseded by [AS-059]). This provides a new circular route on the Saxmundham Converter Station site and connects into the existing PRow network to the east and south. Open areas of grassland will also be established within pockets of woodland creating open glades and along the permanent PRow diversions.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.16.4	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Working hours	The Council is also concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on the PRow network at times they are most frequently used. The Applicant's position does not refer to the respite users would be able to experience from the impacts from this project in combination with cumulative schemes.	<p>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. 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;	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<ul style="list-style-type: none"> - purpose of usage; and - potential for substitution. <p>Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated even with the inclusion of working hours on Sundays and Bank Holidays.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.16.5	N/A	Mitigation for impacts to PRow	<p>There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on Public Rights of Way. These include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PROW) alongside the Fromus crossing to link to the existing PROW network.</p> <p>The Council does not agree that provision in the Order Limits for the enhancement or creation of PRow routes is not necessary mitigation given the impacts caused by extensive closures and diversions in addition to the other impacts identified by the Applicant including significant intra-project cumulative effects.</p>	The current proposals do not include additional opportunities for recreation as it is not identified as essential mitigation in the ES and therefore powers are not sought for this.	Under discussion
3.16.6	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Consideration of Suffolk Coast Path and Sandlings Walk	<p>The Council welcomes the inclusion of the King Charles Coast Path in document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk in sections 4.2, table 4.2 and table 5.1, however there are two other promoted routes which should be considered and impacts assessed, the Suffolk Coast Path not yet fully superseded by the Kings Charles Coast Path), and the Sandlings Walk, as these are tourist routes, as well as local amenity and routes for health and wellbeing.</p> <p>The Council now recognises that these routes have now been assessed as part of the Environmental Statement.</p>	<p>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 PRow and recreational routes, including the Suffolk Coast Path and the Sandlings Walk. As set out in paragraphs 10.9.37 to 10.9.38, the Suffolk Coast Path would be crossed by the Suffolk Onshore Scheme during construction, as the trenchless HVDC alignment crosses the route. Additionally, permanent access along the HVDC alignment is required by foot and/or quad bike on an annual basis for monitoring purposes during construction and operation. Given the HVDC installation would be trenchless below ground level, this crossing would not impact the Suffolk Coast Path. Movements on the permanent access route are expected to be infrequent in the context of the duration of the operational and maintenance phase, and therefore will have a negligible impact. Overall, this results in a permanent negligible socio-economic effect on the Suffolk Coast Path which is not considered significant.</p> <p>Sandlings Walk is considered within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10</p>	Agreed

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				<p>Socio-economics, Recreation and Tourism [REP1A-005] but there would be no impact on the Sandlings Walk arising from the Proposed Project.</p> <p>Paragraph 10.9.101 notes 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 private, community, recreational and tourism assets 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]. For PRow, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], this considers the "<i>potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health</i>". This assessment draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant effects on social cohesion and community identity, including amenity impacts on PRow and other recreational receptors.</p>	
3.16.7	<p>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p>	Public Rights of Way (PRow) Assessment and Mitigation	<p>The Consultee requires National Grid to consult PRow team to minimise disruption to PRow network and recommends engagement to discuss additional mitigation where necessary e.g. for any permanent PRow diversions. The Applicant's approach does not seem to reflect this</p> <p>The Consultee requires PRow to be avoided and/or kept open during construction where possible and any temporary closures to be kept to a minimum (both number and duration). The commitment to retain access to all existing PRow with a limited number of temporary diversions is welcomed.</p> <p>The Consultee requests a review of PRow in terms of route quality, alternative routes (footways v bridleways) and usage levels included in the relevant control document and that impacts on PRow used as construction accesses (S-BM08 and S-BM13) are considered and adequate mitigation is implemented accordingly.</p> <p>The Consultee notes the approach for the Outline PRowWMP, to identify management/mitigation to avoid significant PRow</p>	<p>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] has been developed in consultation with SCC and ESC and sets out the measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. PRow will be kept open wherever possible during the construction phase through the management measures identified. Diversion routes have been identified where any temporary PRow closures will be required, to prevent the requirement for alternative routes to be used. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. The proposed diversion routes are subject to agreement with SCC as part of bringing forward a detailed PRowWMP under Requirement 6 of Schedule 3 of Application Document 3.1 (E) draft Development Consent Order [CR1-027].</p> <p>Masterplanning is also being undertaken in order to ensure effective coordination takes place with regard to</p>	Under Discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			effects during all phases though the lack of closure/diversion avoidance remains an unresolved issue.	<p>the impacts on PRow. For example, the permanent PRow diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to fully consider the long-term future of the site and to avoid the need for subsequent diversions.</p> <p>It should be noted that no surveys of PRow have been carried out as the proposed management and mitigation relating to PRow as set out within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] will be put in place irrespective of existing usage levels, to retain safe PRow access for all users. Where required, the interface between the construction area and existing (or diverted) PRow will be physically separated by fencing and gates to prevent PRow users from encountering construction traffic.</p> <p>SCC PRow officers have been consulted and attended thematic meetings, where engagement took place regarding potential PRow impacts and mitigation. A schedule of meetings held is set out in Table 2.1 of this SoCG.</p>	
3.16.8	<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p> <p>Figure 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments within Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238]</p> <p>Application Document 7.10 Coordination Document [APP-363]</p>	Cumulative effects assessment of PRow	The Consultee suggests that repeated/sequential impacts on PRow should be considered e.g. repeated closures/diversions as each NSIP comes forward.	<p>The Applicant has endeavoured to reduce impacts on PRow wherever possible. An Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047] has been prepared as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRow diversions, closures and management during the construction, operation and decommissioning phases. PRow closures and diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects.</p> <p>The assessment of cumulative effects on PRow as a result of committed developments is set out within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] based on Figure 6.4.2.13.1 Suffolk Onshore Scheme Short List Developments within Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238], which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm.</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
				Master planning has been undertaken in order to ensure effective coordination takes place with other projects with regard to the impacts on PRow as set out in Application Document 7.10 Coordination Document [APP-363] .	
3.16.9	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238]	Cumulative effects: Assessment on PRowS	The Consultee requests that contiguous effects on PRow are also considered as a result of the sequential delivery of NSIPs (SPR, Sizewell, SeaLink, LionLink) i.e. repeated impacts/ closures or increased duration of impacts due to cumulative schemes	<p>The consideration of cumulative effects on PRow as a result of committed developments is set out within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] based on Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238], which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm.</p> <p>Masterplanning is being undertaken in order to ensure effective coordination takes place with regard to the impacts on PRow. As set out within ID 3.10.3 above, the Proposed Project is designed to minimise adverse or repeated impacts on the PRow network and to provide benefits to the public.</p>	Under discussion

3.17 Socio-Economics, Recreation and Tourism

Table 3.17 Socio-Economics, Recreation and Tourism

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.17.1	N/A	Engagement	<p>The Council 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> <p>The Council welcomes the opportunity to strengthen and support the growth of local businesses through their involvement in a project such as this. However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk. The Applicant should commit to ongoing collaboration and engagement with SCC within the DCO such as through a requirement for a detailed Employment, Skills and Education Strategy/Plan in accordance with 5.13.12 of EN-01. This is especially pertinent when it is known that this project is one of a series of projects being brought forward by National Grid in the locality and therefore will provide a far greater opportunity than a single project would.</p> <p>The project could benefit the local economy as a result of additional spend from a non-homebased workforce. The Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.</p>	<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 Project develops, the detail of the approach can be shared and discussed with a view to benefit the local economy.</p> <p>As part of the DCO submission it is noted that the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.</p> <p>The Applicant is 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 the Proposed Project and would be disproportionate to the scale of the potential effect and the Applicant's duty.</p> <p>The number of jobs supported by the Proposed Project is relatively low and short-term, when considered in isolation. When considered in the context of wider the Applicant 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

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				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.	
3.17.2	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</p>	Potential impacts of the Proposed Project	<p>The Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme, to assess potential impacts to these organisations of the construction works and access routes.</p> <p>Impacts on businesses should be recognised not only in terms of direct effects through lowered visitor numbers but also indirectly through transport impacts impacting the transportation of staff and deliveries of goods, particularly fresh produce and perishable goods, may create logistical issues for businesses which should be recognised in the Applicant's assessments. SCC's concerns with the assessment of traffic and transport impacts are set out elsewhere.</p> <p>The Applicant should take a proactive approach in engaging with businesses to seek their views on how they could minimise impacts on them and should seek to coordinate with other cumulative schemes where businesses may be affected by the delivery of multiple projects.</p> <p>The Study Area for impacts on businesses, tourist attractions and community facilities is within 500m of the Order Limits of the Suffolk which the Council considers to be quite restrictive. The logistics of businesses outside this area may be impacted by increased traffic from this project in combination with cumulative schemes. There may be potential for amenity impacts on businesses outside the study area through increased traffic and noise.</p> <p>The Council recognises that the Applicant's assessment has been produced according to the DLUCH Appraisal Guide. However, the Council stresses that this is guidance and should be treated as such. Contextual factors should be considered when forming a best-practice approach to this assessment. The Council considers that the unique cumulative context of the proposed development justifies a more thorough approach to assessment. Particular aspects of this context which warrant a more thorough approach include the present high degree of uncertainty over the future actual socioeconomic effects of Sizewell C and the effects of future projects currently in the formative stages but likely to overlap with Sea Link.</p>	<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 businesses. To address this, the Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified following the application of appropriate mitigation.</p> <p>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 assessment concludes that there are no businesses within the Study Area which would be significantly affected by the land required for the Suffolk Onshore Scheme or to which access would be required. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] concludes there are no roads assessed that would experience significant severance effects during construction. 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 amenity effects are identified with regards to human health and wellbeing.</p> <p>As a result, there will be no significant effect on business assets arising from the construction of the Suffolk Onshore Scheme and no mitigation will be required.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

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3.17.3	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</p>	Cumulative assessment	<p>There are a significant number of NSIPs in East Suffolk that will be requiring similar skilled workers at the same time, and the construction period for Sea Link is predicted to coincide with that of Sizewell C Nuclear Power Station. This is likely to put pressure on the available workforce, potentially reducing opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.</p> <p>Whilst the Council recognises the Applicant's estimation for average net additional jobs per annum, the context of cumulative schemes means this will put additional pressure on existing and forecast skills shortages.</p> <p>SCC has commented further on the cumulative effects assessment in relation to socioeconomic issues in Chapter 13 of SCC's LIR [REP1-130] such as paragraph 13.48, 13.49 and 13.56.</p>	<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 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 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. 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 assessed to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.17.4	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Assessment methodology	<p>The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each.</p> <p>The evidence used to support the Applicant's position on the 60-minute study area states that 90% of employees commute 60 minutes or less each way. SCC considers that more robust evidence should be used which relates to the East of England region and the construction sector as travel behaviours for work may vary based on these factors. Moreover, the figure of 90% means 10% travel further than 60 minutes</p>	<p>Section 10.6 and Table 10.13 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] sets out the study areas for the assessment and the rationale for selecting this impact area. The 60-minute travel area has been used in line with appropriate 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. This approach is consistent with other DCO applications and provides a robust basis for assessing potential effects on the labour market.</p> <p>Within this 60-minute travel area, there are approximately 26,550 people employed in the construction sector. The Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff. Under a worst-case scenario whereby all 327 FTEs are employed from the existing construction labour pool within the study area, the assessment concluded that there would be no significant effects on labour supply.</p> <p>While detailed information on the specific skills required at each construction or operational phase is not available, the ES 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.</p> <p>With an average of 65 net additional jobs required during construction and approximately six personnel on-site during operation, impacts on</p>	Under discussion

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			<p>which should be reflected in the Applicant's assessment. The Council expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with the Council to ensure robustness and alignment with wider socio-economic modelling.</p> <p>The Council recognises that the Applicant is limited in what it can assess based on the information available regarding the specific skills required at each phase. However, the Applicant should recognise that this undermines their assessment being representative of the reasonable worst case scenario. SCC considers this point in the context of increasing cumulative workforce pressures to support its ask for an Employment, Skills and Education Strategy secured by the DCO to ensure there is provision for appropriate mitigation once there is more certainty over the project's impacts post-consent.</p>	<p>the supply chain, workforce displacement and churn are expected to be negligible, due to the limited scale of labour demand.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.17.5	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Skills and Employment Plan	<p>The Applicant expects a low level of net additional construction employment to be taken by local residents, due to the jobs being specialised construction. The Council considers that the fact that this may have been experienced in other similar schemes does not mean the same will be true for this project. The skills and employment context of the project must be accounted for which differs from most regions given the prevalence of NSIPs concentrated in East Suffolk, especially Sizewell C which is projected to employ a far larger number of workers than is common for energy NSIPs. It is not clear that the number and magnitude of other infrastructure projects taking place in the area, , and therefore the prevalence of such specialised skills locally, has been taken into account by the Applicant when coming to their conclusion.</p> <p>A comprehensive Skills, Employment and Education Plan and engagement with the Regional Skills Coordination Function at the Council would support an ongoing assessment of cumulative effects and a strategic approach to skills and employment a strategic approach to this issue and ensure the scope for employing local residents is maximised. More detail on SCC's position can be found in [REP1-130] and [REP2-062].</p>	<p>The Applicant notes the Council's encouragement to recruit the construction workforce locally. The home-based workers assessment is set out in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]. As set out in Table 10.20, in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage; the proportion of jobs taken-up by people who live inside of the Study Area, here defined as a 60-minute travel area. This Study Area is based on research by the CIPD which found that 90% of national employees commuted for 60 minutes or less each way. The leakage rate has been estimated to be 30%, given the specialised nature of the construction roles which may require sourcing labour from outside the local area. This figure has been determined using professional judgement and is informed by assumptions used in other comparable NSIPs. Applying the 30% leakage rate to the average net additional employment, it is estimated that approximately 20 construction jobs per annum would be taken up by residents within the Study Area.</p> <p>As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social</p>	Under discussion

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				<p>value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.</p> <p>The number of jobs supported by the Proposed Project is relatively low and short-term, when considered in isolation. When considered in the context of wider the Applicant 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> <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>	
3.17.6	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]</p>	Assessment methodology	<p>The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods affecting availability of workers to meet the needs of other industries and major projects within the region.</p> <p>SCC disagrees with the Applicant's reasoning that lower unemployment means the workforce in East Suffolk has an increased ability to absorb impacts since impacts of workforce displacement and churn would be exacerbated by a greater likelihood of the project's workforce needing to be taken from those already in work.</p>	<p>As 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], the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Therefore, the local workforce in East Suffolk is assessed to be of low sensitivity given it has the ability to absorb impacts. 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 NSIPs. 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> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.17.7	<p>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]</p> <p>Application Document 6.15 Scoping Opinion 2022 [APP-300].</p>	Assessment methodology	Operational Employment effects should be considered alongside other projects in the region, which will amplify any effects caused.	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 6.15 Scoping Opinion 2022 [APP-300] . As set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] 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	Under discussion

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3.17.8	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</p>	Impact on tourism and visitor perception	<p>Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SCHAONB and Heritage Coast.</p> <p>The Council anticipate that the project, given its location close to the SCHAONB and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects happening simultaneously in the area, could be significant.</p> <p>The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers.</p> <p>SCC does not share the Applicant's confidence that there will not be material adverse effects on tourism. The Applicant cites monitoring reports from Sizewell B and Hinkley Point C, but these projects do not share the same contexts as Sea Link in terms of cumulative effects. Sea Link will be constructed and operated in the context of multiple other NSIPs in the vicinity being constructed and operated, including upcoming projects such as Lion Link and Helios Solar. The comparison to Sizewell B diverges in this way. Sizewell B was also of a different scale and was constructed from 1988. This shows that meaningful comparisons on effects on visitor perception today are severely limited.</p> <p>Sizewell C and Hinkley Point C were consented with sizeable mitigation funds for negative effects on tourism which suggests those promoters recognised the potential for significant effects.</p> <p>Sizewell C's mitigation measures do not account for effects from future projects such as Sea Link on the local tourism industry, meaning these effects will be unmitigated. In summary, SCC does not consider the available evidence to demonstrate that there will be no material negative impacts on tourism. SCC recognises the limited evidence available on the matter; however, it is the responsibility of the Applicant to gather further</p>	<p>operation there would be approximately six personnel on site, divided between three shifts over a 24-hour period.</p> <p>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 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> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

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			evidence. If this is not undertaken, SCC would consider a commitment to further assessment post-consent and a contingency fund, should evidence of negative impacts be found at a later date to ensure such impacts are adequately mitigated or offset, to be a suitable and necessary approach in this scenario		
3.17.9	<p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]</p>	Working hours	The additional core working hours (7am – 5pm on Sunday and Bank Holidays) is likely to affect local tourism due to the impacts on the PRow network and roads used for recreational purposes at times when they are most frequently used which could further impact visitor perception and tourism.	<p>The Applicant notes the Council's concern regarding the potential for adverse impacts on visitor and tourism 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 visitor and tourism 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 workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor.</p> <p>The Applicant 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. Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] 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 and 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</p>	Under discussion

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				<p>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 even with the inclusion of working hours on Sundays and Bank Holidays.</p>	
3.17.10	N/A	Visitor economy: Local accommodation	The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region.	The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.	Under discussion
3.17.11	N/A	Community benefit	The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025.	<p>Community benefit is separate to compensation and mitigation. The Applicant welcomes the Government's guidance on community benefits. The guidance offers a clear framework and enables the Applicant to work with communities to deliver meaningful, long-term, social and economic benefits through strategic investment.</p> <p>The Applicant is committed to working with Ofgem, industry partners, local communities and their representatives to ensure these benefits are delivered fairly and effectively, driving lasting, positive change for the people and places integral to developing the electricity network. Separate to this guidance, the Government has also announced plans for a bill discount scheme for nearby households. The Applicant will continue to work with Government as further details of this scheme emerge.</p>	Under discussion
3.17.12	N/A	Legacy opportunities	The Council also encourages project promoters to consider legacy opportunities in areas such as the visitor economy, hospitality sector, skills and	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.	Under discussion

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			employment of local residents from all elements of their development.	<p>In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. National Grid welcomes all suggestions for the potential use of community benefit funding.</p> <p>Ahead of construction and separately to the planning process, National Grid will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. National Grid 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>	
3.17.13	<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>	Assessment of Visitor and Tourism Economy	The Consultee raised a point around perception, in terms of visitor economy, the relationship with tourism businesses and PRow for example (e.g. PRow and camping business) – important to be aware of that and consider.	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
3.17.14	Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]	Assessment conclusions	<p>This leakage rate is unacceptable, particularly with the number of infrastructure projects in the local area, including those by the Applicant.</p> <p>The Council would expect that the Applicant works as a meta-project in order to reduce the leakage rate and maximise the number of jobs taken up by residents through investment in skills locally. The construction labour force displacement has been assumed to be low without taking into account competition from other major infrastructure projects in the region and existing skill shortages, as well as lower economic activity rates. This has the potential to risk project timelines and inflated project costs, as well as a negative economic legacy in the region.</p> <p>The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by</p>	The Applicant notes the Council's encouragement to recruit the construction workforce locally. The home-based workers assessment is set out in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] . As set out in Table 10.20, in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage; the proportion of jobs taken-up by people who live inside of the Study Area, here defined as a 60-minute travel area. This Study Area is based on research by the Chartered Institute of Personnel and Development (CIPD) which found that 90% of national employees commuted for 60 minutes or less each way. The leakage rate has been estimated to be 30%, given the specialised nature of the construction roles which may require sourcing labour from outside the local area. This figure has been determined using professional judgement and is informed by assumptions used in other comparable NSIPs. Applying the 30% leakage rate to the average net additional employment, it is estimated that approximately 20 construction jobs per annum would be taken up by residents within the Study Area.	Under discussion

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			<p>the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods affecting availability of workers to meet the needs of other industries and major projects within the region.</p> <p>Conclusions drawn regarding the construction workforce labour supply fail to consider the cumulative impact of multiple major infrastructure projects and existing skill shortages.</p> <p>The Council has given its detailed position on the Applicant's assessment conclusions in chapter 12 [REP1-130] of its LIR, including regarding the potential for greater adverse impacts on the visitor economy, hospitality and local businesses.</p>	<p>As part of the DCO submission, the Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.</p> <p>As 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], the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Additionally, within the 60 minute drive time there is a higher proportion of residents in skilled trade occupations compared to the regional and national averages. These characteristics suggest that the area has capacity to absorb the employment impacts of the Proposed Project without significant disruption or strain on the local economy. Therefore, classifying labour supply sensitivity as low is considered appropriate.</p> <p>The Council's concerns regarding employment displacement and churn are noted. Given the scale of 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. While detailed information on the specific skills required at each construction or operational phase is not available, the ES 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.</p> <p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] assesses the cumulative impact of the Proposed Project in addition to other NSIPs. 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 assessed to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.</p>	

3.18 Health and Wellbeing

Table 3.18 Health and Wellbeing

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.18.1	Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]	Electric and Magnetic Forces	The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to. Nevertheless, the Council expects the completion of an EMF risk assessment as required by Management of Health and Safety at Work Regulations 1999 and HSEs Control of Electromagnetic Fields at Work Regulations 2016.	<p>Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with Electrical and Magnetic Forces (EMF) guidelines and policies is key to the Applicant’s approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. When designing overhead lines, substations and cables, design criteria ensure they will not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the Government have adopted, are applied to the design which ensure the EMFs reduce as quickly with distance as possible. Evidence of that is presented in Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289] submitted as part of the DCO application.</p> <p>Occupational exposures to EMF in England, Wales and Scotland are controlled by the Control of Electromagnetic Fields at Work Regulations 2016 (CEMFAW Regulations, 2016), which implement a 2013 EU Directive (EC, 2013). Employers have a duty of care to their employees, discharging that duty of care in relation to EMF primarily by complying with the relevant exposure limits. Occupational exposure limits are higher than the public exposure limits which the project would be compliant with in all areas accessible to the public and to employees of third parties. Therefore, all exposures from the project would be compliant with the occupational exposure limits, and employers need take no additional action specific to the project in order to comply. (The CEMFAW Regulations impose certain general duties on all employers which would apply regardless of the project.). Evidence for this is contained within Document 6.5: Electric and magnetic field compliance report.</p> <p>In some areas of the project, accessible only to National Grid staff and to contractors of National Grid but not to the public or to employees of third parties, e.g. inside substation perimeter fences, higher fields could be found that exceed the public exposure limits. National Grid has its own procedures for ensuring that employees do not exceed the occupational exposure limits in these areas.</p>	Under discussion
3.18.2	Application Document 5.1 Consultation Report [APP-301]	Community engagement	Suffolk County Council has published a supplementary guidance document for NSIP developers on the topic of Community Engagement and Wellbeing, to support its Energy and Climate Adaptive Infrastructure Policy.	The Applicant acknowledges the Council’s concerns. However, there has been an extensive programme of engagement which is in accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods. There have been	Under discussion

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			<p>This guidance highlights the importance of effective engagement with communities. The Council considers it essential for promoters to seek to develop relationships of trust, confidence and understanding with the community, taking a collaborative approach to involving the community in the design and delivery of the project. Clear, comprehensive, honest, and open engagement with the community throughout the pre-application, consenting, construction and decommissioning phases will help to safeguard community wellbeing, as participants are more likely to feel that they are being listened to and their opinions and ideas are being taken into account.</p> <p>The Council recognises that the Applicant has undertaken consultations referenced in its position. However, the Council considers that effective engagement with the local community during certain parts of the pre-application stage has not been achieved. The targeted consultation overlapped the start of the summer holidays and the Ofgem consultation for Nautilus and only lasted 5 weeks. The timing of these consultations will therefore have limited the community's ability to effectively engage with and respond to the consultations.</p>	<p>multi-stage pre-application consultations allowing consultees several opportunities to provide feedback as the proposals evolved.</p> <p>Pre-application consultation involved four phases. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by two phases of statutory consultation, undertaken in accordance with the Statement of Community Consultation—the preparation of which included contributions from the Host Authorities. Statutory consultation was held between 24 October 2023 and 18 December 2023. Targeted consultation took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement), was held between 22 November 2024 and 12 January 2025.</p> <p>All feedback received during the four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement undertaken by the Applicant as part of its preparation of the application for development consent for the Proposed Project. Regard has been had to all feedback received, and changes have been introduced into the Proposed Project design as a result.</p> <p>The consultation process and its outputs are captured in Application Document 5.1 Consultation Report [APP-301] and the Planning Inspectorate has accepted the DCO application on the basis of the approach to consultation.</p>	
3.18.3	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]	Assessment methodology – mental health and wellbeing	<p>The Council expects mental health, and wellbeing impacts to be assessed as part of the ES. The Council is concerned that the assessment of effects on mental health and wellbeing lacks detail and may not capture the full extent and magnitude of these effects especially when considering the combined effects of cumulative schemes.</p> <p>11.9 of [APP-058] recognises the potential increased demand on GP Practices, but it does not appear to consider the potential impact on mental health (MH) services in enough detail. There is a lack of detail on how impacts on these services have been assessed, such as in terms of impacts on capacity, which means the Council is not confident that the assessment is sufficiently extensive. It is vital for these impacts to be properly assessed, as major infrastructure projects can generate anxiety and distress among local residents, meaning the accessibility of these service must be safeguarded. It is recommended that the assessment considers whether the construction and operation phases could place additional pressure on local MH services, and whether any mitigation or support measures should be identified.</p> <p>The guidance referred to by the Applicant recommends a 1:1800 GP:Patient ratio. However, this guidance was published in 2009 and so was created with limited foresight of the various</p>	<p>The assessment of health and wellbeing impacts 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 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). Therefore, mental health is considered in the EIA 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;	Under discussion

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			regional socioeconomic and demographic contexts at present. This is particularly relevant for the demographic context for the Suffolk Onshore Scheme which is above average in terms of average age. When considering the presence of other vulnerable groups as well, there is potential for patients to, on average, require health services to a greater extent than elsewhere. However, this is not captured by the ratio used by the Applicant as the metric by which it appears to derive its assessment conclusions.	<ul style="list-style-type: none">• Transport modes, access, connections and physical activity; and• Social cohesion and community identity. <p>The academic study '<i>Wellbeing Impact Study of High-Speed 2 (WISH2)</i>¹' was also reviewed by the health and wellbeing specialists to inform the assessment and approach in terms of mental health and wellbeing within the EIA, specifically whether the study's findings, particularly regarding assessment methodology, warranted changes to the existing approach. This technical review concluded that WISH2 is a 'study protocol', that stemmed from the fact that previous studies into high-speed rail systems have had very little consideration of health impacts, and particularly mental health and wellbeing, with more of a focus placed on accessibility, tourism, housing and land, and economics. The topics in discussion within WISH2, include social connectedness and social exclusion, which are topics which link to existing IEMA and Healthy Urban Development Unit (HUDU) determinants which are considered within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. In addition, WISH2 suggests that impacts may be experienced differently across different groups of society, a matter that is also recognised by the IEMA guidance and therefore considered through the EIA process, particularly in terms of identifying sensitivity of receptor (often local population in this case).</p> <p>Additionally, the document states that the WISH2 study is intended to last for 10 years, which is not considered to align with the EIA process or timescales and preparation of an assessment of effects within an ES chapter for a project such as Sea Link. Overall, the technical review concluded that no modifications were necessary to the approach being taken in the EIA, as the proposed health and wellbeing methodology aligns with the latest best-practice guidance from IEMA (2022) and HUDU (2019), as well as encompassing local knowledge from relevant thematic meetings with the local authorities.</p> <p>It is the Applicant's view that Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn</p>	

¹ Katherine I. Morley et al., (2024); Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing. Available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0298701> [Accessed May 2024]

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				<p>mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in Application Document 9.83 Code of Construction Practice submitted at Deadline 3 and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. The Applicant as part of its submission has produced a report on coordination which covers how it 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 effects associated with health and wellbeing are also assessed in Application Document Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective cumulative effects assessments of these relevant environmental disciplines. Therefore, the health and wellbeing cumulative effects assessment concludes 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.</p> <p>As set out in Application Document 5.1 Consultation Report [APP-301], the Applicant considers that no further changes are considered necessary to be made to the submitted DCO application to make the Proposed Project consistent with national policy in regard to health and wellbeing impacts. In response to the Council’s expectation that mental health and wellbeing impacts be fully assessed as part of the ES, the Applicant notes that these have been considered in accordance with best practice guidance, and the importance of mental health has been fully acknowledged and embedded throughout the assessment process.</p> <p>The Health and Wellbeing assessment in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 [APP-058] explicitly considers mental health as part of a holistic approach to health, in line with WHO and IEMA guidance. Potential impacts on mental health services are captured within the assessment under the determinant “<i>Access to healthcare services and other social infrastructure</i>”, which accounts for both primary care and mental health provision. The assessment recognises that construction and operation of the Proposed Project could generate anxiety or distress among local residents. Potential additional demand on healthcare services is considered, and even in a worst-case scenario, the GP:Patient ratio is predicted to remain broadly in line with recommended guidance in Section 11.7. The assessment in</p>	

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				<p>section 11.9 of “<i>Access to healthcare services and other social infrastructure</i>” draws on public health, socio-economic, and environmental data, considering vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. Overall, any effects on health and wellbeing arising from increased demand on healthcare services or temporary reduced access to social infrastructure during construction are assessed as temporary and negligible (not significant).</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	
3.18.4	N/A	Data used in Health and Wellbeing Assessment	<p>Paragraph 11.7.21 [APP-058] refers to Mental Health within Local Health Profiles, but does not set out a profile. – The Council acknowledges the Applicant's position but does not agree that it can replace a profile which is founded on evidence and data. A data driven profile would also allow SCC to evaluate whether the profile is an accurate reflection of mental health in the area and how robustly evidenced it is. SCC Public Health therefore request that this data is provided and assessed under Chapter 11.7. This exercise is essential to ensure that the Applicant's assessment is based on an accurate baseline of mental health such that the adverse impacts are not underestimated. The Council therefore cannot presently agree that the Applicant's assessment has been undertaken against a robust benchmark.</p> <p>Paragraph 11.7.42 could be improved by setting out broader demographic assessments. This should include unemployment rates, protected characteristics, gypsy/ travellers non-English speakers, people involved in the criminal justice system, refugees and/or asylum seekers, single parent families and people with low literacy/numeracy. The assessment should note if these groups are more likely to be adversely affected by the proposal, which should be reflected in their sensitivity classifications, and key learnings should be used to inform mitigations.</p>	<p>In terms of providing a full assessment and profile of mental health, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] draws upon a range of socio-economic and public health data, including wider determinants of health that influence mental wellbeing, such as self-reported health, prevalence of long-term health conditions, the Index of Multiple Deprivation (MHCLG, 2019), Community Life Survey (Department for Culture, Media and Sport, 2023), and access to local services (incl. greenspace, PRoW). The chapter also incorporates baseline indicators relevant to health and wellbeing from other environmental topic chapters, including employment, air quality, transport, noise and vibration, and climate change. While specific quantitative indicators of stress, resilience, or anxiety are not separately reported, the assessment explicitly considers determinants and pathways that underpin these outcomes. In doing so, it inherently recognises the factors affecting quality of life, broader wellbeing, and mental health within the Study Area. The assessment within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] has been undertaken against a robust benchmark of baseline health conditions, with full cognisance of relevant mental health and wellbeing issues, and in line with established IEMA guidance (IEMA, 2022) and IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022).</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] considers the potential for effects on both the general population and vulnerable groups. Baseline information on employment, income, and socio-economic characteristics in Paragraph 11.7.42 is drawn from Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005], which does include data from the Annual Employment Survey (Office for National Statistics, 2022) on unemployment, claimant rate, and qualifications, and also considers data from the Indices of Multiple Deprivation (IMD) (Ministry of Housing, Community and Local Government, 2020).</p> <p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] considers vulnerable groups, such as children,</p>	Under discussion

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				the elderly, and individuals with pre-existing health conditions in its assessment of health and wellbeing effects, in terms of sensitivity classification. This ensures that differential health outcomes and potential disproportionate effects on more sensitive populations are appropriately captured within the assessment. The approach taken represents a proportionate and robust application of current guidance, ensuring that both stakeholder insight and recognised health determinants are appropriately considered in the assessment of potential effects	
3.18.5	Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]	Cumulative assessment	It is important for the cumulative impacts to be considered. This area of Suffolk is facing a huge number of NSIPs, and the mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate these effects on community wellbeing.	<p>The cumulative impact is assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060], which assesses the impact 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 concludes 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> <p>The Applicant recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health, recognising the impact that other projects may have had upon local residents. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through 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> <p>In terms of working collaboratively to address this, the Applicant is engaging with other developers on an ongoing basis, including participation at the Energy Projects Forum hosted by East Suffolk Council.</p>	Under discussion
3.18.6	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health	Working hours	The potential for construction activities taking place within the additional core working hours stated could result in communities in the locality having no respite from construction traffic and could contribute to substantial impacts on the mental	Section 11.9 of Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] assesses potential effects of the Proposed Project on health and wellbeing of local residents. The assessment takes a holistic approach to health and	Under discussion

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	and Wellbeing [APP-058]		health and wellbeing of those communities. The Applicant must consider the community wellbeing impacts of the proposed working hours.	<p>considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Proposed Project which could affect mental health (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). The assessment has been completed in line with the IEMA guidance "Determining Significance For Human Health In Environmental Impact Assessment".</p> <p>To respond directly to concerns raised about the mental health of affected communities, the Applicant has provided a detailed response above to point 126 to set out relevant evidence, baseline data, and methodological considerations related to mental health, providing transparency on how mental health outcomes have been considered and assessed throughout Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058].</p> <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 current assumption of working hours as set out in Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]. No significant adverse effects are identified with regards to human health.</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 current assumptions of working hours, to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes 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> <p>The Applicant recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health, recognising the impact that other projects may have had upon local residents. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through 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> <p>The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, National Grid have carefully evaluated</p>	

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				<p>the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts.</p> <p>The Applicant is maintaining ongoing dialogue with the District and County Council 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>	
3.18.7	<p>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</p> <p>Application Document 9.83 Code of Construction Practice submitted at Deadline 3 and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	Mitigation of health and wellbeing effects	<p>There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on community wellbeing. These include providing a 'relationship manager' role as a consistent, impartial, single point of contact for the community, providing timely, high-quality, and accessible information on proposals, and engaging in face-to-face conversations with community leaders, parish councils, and the local community to guide them through what is a highly technical and complex process.</p> <p>The Council considers investment in local community assets, such as public spaces or village halls, as an effective approach to mitigation and compensation for the local community, whilst also helping to foster positive relationships with affected communities. Relevant assets should be identified in collaboration with the community itself.</p> <p>Helping the local community to better support its own mental health and wellbeing is also an effective mitigation measure. This could be achieved through provision of funding to local mental health organisations, funding Mental Health First Aid training for members of the community, and raising awareness of tools for maintaining wellbeing, such as East Suffolk Council's WellMinds resource.</p> <p>Whilst SCC welcomes the commitment within the REAC [APP-342] regarding community liaison, it is not sufficient to address the full range of community wellbeing and mental health impacts associated with the Proposed Project as set out in this chapter. To aid in mitigating these effects, community engagement should go beyond the REAC focus on providing information and a procedure for complaints. See paragraph 14.96 of SCC's LIR [REP1-130] for details on what SCC expects in terms of community engagement.</p> <p>SCC Public Health suggests an additional bullet point under GG05 'Dealing with Public Interaction and Managing Confrontational Situations'. The commitment should make provisions for providing training for site staff, particularly those working in public facing roles or in areas near residential communities, on how to appropriately respond to confrontational behaviour, verbal abuse, or hostility from members of the public. This should include guidance on</p>	<p>Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective, as set out in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. In terms of disruption and in recognition of the potential for impacts on community wellbeing that could arise from activities on site, and surroundings, there are measures set out in Application Document 9.83 Code of Construction Practice submitted at Deadline 3 and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health.</p> <p>The Applicant will continue to employ a Community Relations Team throughout the Examination and into the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils, and the local community.</p> <p>The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. Community benefits are not a material planning consideration and are not mitigation for impacts identified as part of the planning process.</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.</p> <p>The Applicant is considering further comments from SCC on community engagement and will update their position in the next version of the</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			deescalation techniques, reporting procedures, and support available to staff who experience such incidents.	SoCG. The additional bullet point requested to be added to commitment GG05 of the REAC has been added at Deadline 3.	
3.18.8	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]	Study Area	The Council requests clarity on the potential for adverse impacts beyond the assessed study area.	<p>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]).</p> <p>While “<i>transport modes, access, connections and physical activity</i>” was not presented as a separate line in Table 11.11, this does not reflect an omission in the assessment itself. The study area for “<i>transport modes, access, connections and physical activity</i>” is consistent with that applied for the potential impact “<i>accessibility of PRow, recreational routes and open space, which could impact health and wellbeing</i>” within Table 11.11 in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. For clarity, the study area includes:</p> <ul style="list-style-type: none"> • Users of PRow, recreational routes and open space within and up to a 500 m radius from the Suffolk Onshore Scheme Order Limits. • Human receptors in the vicinity of the road network related to the Proposed Project. <p>The study area encompasses human receptors who could reasonably experience changes to PRow accessibility or the local road network arising from the Proposed Project. These receptors therefore align with the scope of the assessment for “<i>transport modes, access, connections and physical activity</i>,” and are appropriately captured within the impact reported in Table 11.11.</p> <p>The Applicant is considering the request from SCC for clarity on the potential for adverse impacts beyond the assessed study area and will update their position in the next version of the SoCG.</p>	Under discussion
3.18.9	Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]	Assessment conclusions	Regarding [APP-058], SCC Public Health challenges the assessment conclusion of 11.9.59, recognising the implications of 11.9.53, 11.9.54 and 11.9.56. It is suggested mitigations could be applied to 11.9.53 and 11.9.54, and without further mitigations to 11.9.56, the assessment conclusion rating of 11.9.59, 11.9.85 and 11.9.86 should be raised. This should also be considered with respect to cumulative effects.	<p>National Grid submitted the health and wellbeing assessment in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058].</p> <p>The determinant ‘Social Cohesion and Community Identity’ as defined in in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] considers the “<i>potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health</i>”. This highlights that impacts on this determinant may arise through multiple channels, and therefore has been assessed by drawing on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects.</p> <p>The health and wellbeing assessment firstly establishes the sensitivity of the population in relation to social cohesion and community identity. As</p>	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				<p>set out in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], the population is considered to be of high sensitivity. This judgement reflects contextual factors including the rural character of the study area, the importance of the landscape to local identity, and baseline indicators indicating the sense of neighbourhood belonging compared to the national average.</p> <p>Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] identified significant residual landscape and visual effects for a number of viewpoints and local character areas, albeit Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] found no significant impacts on driver delay or community severance, and similarly Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] identified no significant effects on residential properties (in terms of physical changes or disruptions to residential communities) or the accommodation sector.</p> <p>Considering the evidence across the relevant topics, and applying professional judgement, the assessment concludes that the magnitude of impact on social cohesion and community identity is small for both the construction, and operation and maintenance phases of the Proposed Project across Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. This considers that while landscape and visual effects are an important consideration, they do not on their own indicate a loss of social cohesion or community identity across the wider area. Overall, the assessment of social cohesion and community identity is not a sum of its parts, it requires a balanced, holistic judgement of effects, including those found to be not significant, which ultimately supports the conclusion that the impact on social cohesion is minor adverse and not significant.</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] to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes 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> <p>The conclusion reached reflects assessment in accordance with established guidance (IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022)), and represents a proportionate assessment of the likely impacts on community health and wellbeing.</p>	

3.19 Noise and Vibration

Table 3.19 Noise and Vibration

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.19.1	Application Documents 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] and Application Document 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236]	Working hours	<p>Noise and Vibration matters are the responsibility of the relevant district council. The Council will, therefore, generally defer to East Suffolk Council on these matters.</p> <p>The Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) resulting in no respite for local residents and visitors with respect to noise and vibration impacts.</p>	<p>These working hours are intended to ensure that the Proposed Project can be delivered within the timescales required. Shortening working hours would potentially extend the working programme and put at risk the Proposed Project delivery by 2030. 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 Documents 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] and 6.4.2.9 ES Figures Suffolk Noise and Vibration [APP-236]. Should weekend or bank holiday working be required at these locations, and where construction noise 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, as stated in Section 9.10 of Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-058] temporal restrictions would also be considered and put in place, as part of the application of BPM, to ensure that significant adverse effects are avoided, and adverse effects are minimised.</p>	Under discussion
3.19.2	Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise & Vibration [APP-058]	Cumulative effects	<p>The Consultee requested that the assessment adequately considers cumulative impacts of other projects.</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 [APP-058].</p> <p>National Grid 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>	Under discussion

3.20 Air Quality

Table 3.20 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.20.1	Application Document 9.83 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)	<p>The Council generally defers to East Suffolk Council on the appropriateness of measures controlling air quality.</p> <p>The Council welcomes the commitment to seek to avoid the use of diesel or petrol-powered equipment. The Council requests further information on what circumstances determine whether this measure is practicable or not during delivery as there is concern over the vagueness of the current wording.</p>	<p>National Grid commits to several control measures relating to NRMM emissions, which have been included in the CEMP (Application Document 9.83 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;</p> <ul style="list-style-type: none">- 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 Non-Road Mobile Machinery 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. The Applicant is considering the further comments from SCC on the proposed commitment and will update their position in the next version of the SoCG.	Under discussion
3.20.2	Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [AS-129] Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Construction Monitoring	<p>The Consultee recommends more could be done with respect to the monitoring and mitigation of impacts on air quality as a result of construction operations and additional traffic – particularly around the primary school.</p> <p>The Consultee welcomes the installation of live pollution sensors to accurately monitor levels of all pollutants not just NO₂.</p> <p>The County Council has recommended more could be done to monitor and mitigate PM_{2.5} implications deriving from the project.</p> <p>The Council considers that provision should be made for immediate action to be taken should exceedances of air quality be revealed during monitoring.</p>	<p>National Grid commits to carrying out real-time monitoring of NO₂, PM₁₀ 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 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.</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.20.3	N/A	PM _{2.5}	<p>The Council has previously noted that the PEIR states ‘It should be noted that the PM_{2.5} objective is a target value and is not in the 2010 regulations as a legal requirement to be achieved by local authorities. Please note the Environment Act 2021 established a legally binding duty on government to bring forward at least two new air quality targets in secondary legislation. This duty sits within the environmental target’s framework outlined in the Environment Act (Part 1).</p> <p>The Council considers that the Applicant should seek to minimise pollutant levels beyond the legal limits on account of the evidence that such levels can pose significant health risks.</p> <p>As the Council is not the monitoring authority for Air Quality for the Suffolk Onshore Scheme, it cannot itself determine whether the measures set out by the Applicant will sufficiently minimise, monitor and mitigate effects to meet legal standards or to minimise pollutant levels below legal requirements to reduce harm.</p>	<p>Discussed and agreed, for the purposes of the assessment, the Limit Value for annual mean PM_{2.5} (20µg/m³) as set out in the Air Quality Standards Regulations 2010 has been used.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.20.4	N/A	WHO guidelines in assessment	<p>The Consultee also recommends taking account of the World Health Organisation’s guidelines on Air Quality.</p> <p>It would be remiss for the World Health Organisation guidance to not be referenced as its primary purpose is to protect public health as opposed to considering what is nationally achievable which is the case for the national statutory limits.</p> <p>In response to the growing body of evidence suggesting that the Statutory Air Quality Objectives are not enough to protect health, SCC would like to see an emphasis not just on complying with the Statutory Limits but also on bringing air pollution levels down as low as possible for the health and wellbeing of local residents.</p> <p>Should monitoring of pollution levels associated with this project show pollution levels increasing, even within Statutory Limits, it is recommended that remedial action is taken to ensure the levels of pollutants in the air continue to fall.</p> <p>The Council has also set out its position on this matter in Chapter 12 of its LIR [REP1-130], such as in paragraph 12.12.</p>	<p>The Air Quality Strategy (AQS) objectives are the national air quality objective levels which the local authorities need to meet in England. The WHO guidelines are not legally binding in the UK and are not the standards to which local authorities are held to. Therefore, for this ES assessment, AQS Objectives have been used.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.20.5	Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [AS-129] Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]	Dust management	<p>Proposed mitigation measures in-line with the Institute of Air Quality Management best practice are welcome. The control document should ensure that should exceedances be discovered through monitoring, appropriate action is swiftly taken to mitigate.</p>	<p>An Outline CEMP (Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan) 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 for the DCO Application. This includes mitigation and control measures relevant to air quality including dust during the</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
	Application Document 3.1 (E) draft Development Consent Order [CR1-027]			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 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] .	
3.20.6	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	An increase in traffic will lead to an increase in harmful pollutants. The Council will continue to emphasise that pollution, even at low levels and on a temporary basis, can impact health and therefore expects to see every effort made to keep levels as low as possible to protect the health and wellbeing of local communities. Every effort should be made to minimise levels of air pollutants such as by committing to ensure the engines of vehicles are switched off whilst idling.	<p>Construction vehicle emissions have been assessed, and detailed modelling has been undertaken where the construction flows in the peak construction year exceed the EPUK & IAQM screening criteria. These are presented in the Air Quality Chapter of the ES (Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]) and the Cumulative Effects 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]). Sensitivity testing has been considered in Section 8.12 of the Air Quality Chapter. The construction vehicle emissions modelling area has been discussed and agreed, and results have been presented.</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. Predicted concentrations for receptor locations using the cumulative flows are presented in Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123].</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.20.7	Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055] Application Document 9.83 Code of Construction Practice submitted at Deadline 3 Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]	Emissions from generators	<p>The Council welcomes the commitment to seek to avoid the use of diesel or petrol-powered equipment. The Council requests further information on what circumstances determine whether this measure is practicable or not during delivery as there is concern over the vagueness of the current wording.</p> <p>As the Council is not the monitoring authority for Air Quality for the Suffolk Onshore Scheme, it cannot itself determine whether the measures set out by the Applicant will sufficiently minimise, monitor and mitigate effects to meet legal standards or to minimise pollutant levels below legal requirements to reduce harm.</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 Non-Road Mobile Machinery standards, using stage 4 NRMM as a minimum and stage 5 where possible. Further to this, AQ04 requires National Grid to avoid the use of diesel- or petrol-powered generators and use mains electricity or battery</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
	<p>Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [AS-129]</p> <p>Application Document 3.1 (E) draft Development Consent Order [CR1-027]</p>			<p>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 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 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>	
3.20.8	N/A	Vehicle emission controls	Vehicle Emission controls should be included in the OCTMP	<p>Monitoring of vehicles would be undertaken using a Traffic Management and Monitoring System (TMMS), as detailed in Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]. The TMMS will be developed to provide details of the technologies and other means employed to monitor vehicle movements to/from the site. The data from the TMMS would be used to confirm that all HGVs entering the Site meet the Euro VI standard and would be recorded in detailed site logs by the contractor, as specified in Application Document 7.5.6.1 (B) Outline Air Quality Management Plan – Suffolk.</p>	Under discussion

3.21 Emergency Planning

Table 3.21 Emergency Planning

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.21.1	N/A	Emergency planning	<p>Due to the Sea Link proposals being within 10 km of the Extended Emergency Planning Zone for Sizewell B power station, an emergency plan for the construction of Sea Link would be required prior to commencement. This would cover arrangements for protecting construction staff during any site or radiation emergency, and would show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.</p> <p>SCC welcomes the production of an emergency planning document to ensure that emergency planning arrangements, including the Sizewell B Off-site Radiation Emergency plan, are not compromised by the proposed development. SCC refers the Applicant to paragraphs 15.66 to 15.70 of SCC's LIR [REP1-130] which gives the Council's position on the necessity of a requirement to be included in the DCO for the production and approval of this plan prior to commencement.</p> <p>As things currently stand, the Applicant agrees that the document should be produced but the application appears to lack any legal mechanism requiring the plan's production and approval. A DCO requirement for this plan to be submitted and approved prior to commencement is therefore necessary. SCC has suggested that this requirement could mirror the one included in the EA1N and EA2 DCOs referenced in paragraphs 15.69 and 15.70 of SCC's LIR [REP1-130].</p>	<p>The Applicant has been in correspondence with SCC's Emergency Planning team to discuss the emergency planning document in respect to the Proposed Project's interaction with the Suffolk Radiation Emergency Plan.</p> <p>A meeting was held on the 19 August 2024. It was agreed that the required document would be produced post DCO submission and pre commencement of construction. The Applicant plans to be in contact with Emergency Planning team early in 2026 to commence this process.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion

3.22 Draft Development Consent Order (dDCO)

Table 3.22 Draft Development Consent Order (dDCO)

NB: As noted in section 1.2 of this document, the Council has had limited capacity and time to review this document. As a result, a comprehensive legal review and update to the Council’s positions relevant to this table has not been feasible. As such, the table should not be taken as an exhaustive and fully updated account of the Council’s positions on matters relating to the DCO. The Council refers readers to its Local Impact Report [REP1-130] (particularly chapter 15) and its response to Deadline 1 and Deadline 1A submissions [REP2-062] (particularly Table B11) for the Council’s detailed representations on matters relevant to the DCO.

Ref	Relevant Application Documents	Description of Matter	Consultee’s Current Position	Applicant’s Current Position	Status
3.22.1	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Draft DCO	In October 2024, the Council commented on an early draft of the dDCO and provided comments on NGET’s response in January 2025. While NGET has made several of the changes suggested, the Council remains concerned about numerous matters, which are set out in the following paragraphs.	The Applicant reviewed those comments and made amendments where the Applicant felt it was appropriate to do so.	Under discussion
3.22.2	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Definition of discharging authority	<p>Paragraph 1(1) of Schedule 3 defines “discharging authority” as “the body responsible for giving any consent, agreement or approval required by a requirement included in this Order ...”. The definition is circular and unhelpful.</p> <p>Requirement 6 (construction management plans to be approved) provides for the involvement of the “other discharging authority” in certain activities; however, it is not clear who that authority is. Requirements are the DCO equivalent of planning conditions and one of the six tests for conditions is precision. SCC consider the inclusion of “discharging authority” in requirement 6 creates imprecision and requests that the Applicant recasts requirement 6 so that the body they want to be involved in requirement 6 is named</p>	<p>This definition is precededented and accommodates the situation where for each Requirement the discharging body might not be the same body.</p> <p>The Applicant is considering the further comments from SCC and will update their position in the next version of the SoCG.</p>	Under discussion
3.22.3	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Proposed timescales	The deadlines in articles 11(3), 14(5), 15(9), 17(2), 22(8), 50(9), and 51(5) should be 56 days, rather than 35 days.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.	Under discussion
3.22.4	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Proposed timescales	The deadline in paragraph 1(1) of Schedule 4 (discharge of requirements) should be 56 days, rather than 35 days.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.	Under discussion
3.22.5	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Proposed timescales	Requirement 4 of Schedule 3 requires the Applicant to provide the relevant planning authority with written notice of the completion of construction for each stage of the authorised development, and the operational use of that part of the authorised development, within 28 days. The Council considers this should be shortened to 14 days, as in the Bramford to Twinstead DCO.	The Applicant does not agree and submits that the timescales proposed in the draft Order are appropriate.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.22.6	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	Outline versions of management plans	Requirement 6 does not require outline versions of the Material and Waste Management Plan, Construction Drainage Management Plan, and Flood Management Plan, but no justification is provided.	The Material and Waste Management Plan, Construction Drainage Management Plan, and Flood Management Plan have not been prepared in outline as they will be produced prior to construction. The REAC (Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3) includes commitments for the management plans to be produced. The REAC forms Appendix B of the Outline Onshore Construction Environmental Management Plan (CEMP) (Application Document 7.5.3 Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]) and compliance with the REAC is secured through Schedule 3 Requirement 6 of Application Document 3.1 draft Development Consent Order (DCO) [APP-007] superseded by [AS-087] .	Under discussion
3.22.7	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Decommissioning	There is a lack of information provided in Requirement 13 in relation to decommissioning of the substation.	Substations are anticipated to remain part of the network where appropriate – for example Kiln Lane substation in Suffolk would facilitate two SPR projects, as well as Sea Link. Hence the approach to decommissioning should differ from other assets.	Under discussion
3.22.8	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Proposed fees / PPA	The proposed fees in paragraph 3(1) of Schedule 4 (Discharge of requirements) are insufficient, and the Council would prefer a PPA to be entered into with the Applicant to cover the discharge of requirements.	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 (Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) (Amendment) Regulations 2023). 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. However, the Applicant will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure the LPA is able to respond on programme.	Under discussion
3.22.9	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Trees / TPOs	The Council would appreciate justification for the claim in article 52(3) that the duty in section 206(1) of the 1990 Act (replacement of trees) does not apply.	The DCO is a new piece of law as it is a statutory instrument, so it effectively creates a bespoke mechanism for TPOs to be dealt with. The article is based on the general model provisions and is preceded in other made DCOs. From a public policy perspective, the intent of the original Act needs to align with the DCO. Impacts on trees are assessed in the Environmental Statement and subject to the provisions in the NPSs.	Under discussion
3.22.10	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Soft landscaping	The Council is concerned about the exclusion of soft landscaping as an item within each of Work Nos. 1 to 5 of Schedule 1 (Authorised Development)	Work No.1B, Work No.3A and Work No.3B include specific reference to soft landscaping. Schedule 1 following Work 12 includes a catch all inclusion of associated works that includes at e) 'landscaping and other works to mitigate any	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				adverse effects...'. At Deadline 1 the Applicant has also added Work No. 15 on Principal Environmental Mitigation and Landscaping to clearly demarcate these areas on the plans. There is therefore no need to add the reference to soft landscaping to the other specific works. The overall approach to landscaping and reinstatement is also secured by Requirement 6, with the approach detailed in Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045] . Reinstatement is also dealt with in Requirement 9 on Reinstatement Schemes.	
3.22.11	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Ongoing archaeological assessment and mitigation	DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication, and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the Outline Written Scheme of Investigation to secure this; therefore, SCCAS advise the need for amendments in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery of the project and prevent potential delays to the sign off of archaeological requirements.	The aim of Requirement 14 is to ensure that no stage of the authorised development may commence until either a preservation in situ management plan, or a detailed written scheme of investigation of areas of archaeological interest relevant to that stage has been submitted to and approved by the relevant planning authority. The Applicant considers that this wording is sufficient to secure ongoing archaeological assessment and mitigation. It is not considered that the scope of the pre-commencement works defined within Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087] are likely to result in significant ground disturbance that would undermine the archaeological value of the site.	Under discussion
3.22.12	Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Burial Act	SCCAS would advise the need for the addition of a clause to Part 4: Supplemental Powers in relation to appropriately dealing with archaeological human remains believed to be over 100 years old in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents.	Article 23 (Removal of human remains) aims to consolidate the applicable provisions in the Burial Act 1857 to provide an alternative procedure for managing the removal of any human remains disturbed during the course of carrying out the authorised project. The existing article requires the undertaker, before it carries out any development or works which will or may disturb any human remains, to remove those remains. Before removing any human remains, the undertaker is required to publish notice of its intention to do so. Notice is also required to be displayed near the site. The Applicant agrees that it is appropriate to include provision for the removal of human remains in this Order, given the nature of the underground electric line works and such an approach has precedent in the general model provisions and other recently made development consent orders.	Under discussion

3.23 Policy, need, site selection, coordination and design

Table 3.23 Policy, need, site selection, coordination and design

Ref	Relevant Application Document	Summary of Description of Matter	Consultee’s Current Position	National Grid Current Position	Status
3.23.1	N/A	Status of National Policy Statements for Energy	The status of the NPSs were agreed by the Consultee as per the statutory consultation (statutory consultation response paragraph 2.2: “ <i>The Government issued the revised version of the National Policy Statements on 22 November 2023, with the amendments having full effect in relation to ‘those applications for development consent accepted for examination, after the designation of those amendments’, which will include the Sea Link proposals.</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
3.23.2	N/A	Status of Local Development Plan policy	The Suffolk Minerals and Waste Local Plan (adopted 9 July 2020) is the currently adopted local minerals and waste plan for Suffolk.	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 SoS’s decision making.	Agreed
3.23.3	N/A	Local Plan allocations	Areas of the draft Order Limits are within Mineral Consultation Areas identified on the Suffolk Minerals and Waste Local Plan (adopted 9 July 2020) Mineral Safeguarding and Proposed Sites Map	The Development Plan allocations identified in ESC and SCC’s position columns are located within the draft Order Limits.	Agreed
3.23.4	Application Document 5.1.6 Appendix E Statutory Consultation	Need for the project	The Consultee agrees with the need for the Proposed Project as set out in the Consultee’s response to the Statutory Consultation received by National Grid on 17 December 2023.	The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons: <ol style="list-style-type: none">1) the existing transmission network was not designed to transport electricity from where National Grid 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 transport3) 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 businesses4) 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.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Consultee's Current Position	National Grid Current Position	Status
3.23.5	Application Document 8.3 Strategic Options Report (October 2023)	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)) included as part of Statutory Consultation, is agreed.	Agreed
3.23.6	Application Document 8.2 Options Selection and Design Evolution Report (October 2023)	Site selection	The Consultee reviewed the Option Selection and Design Evolution report (Application Document 8.2 Options Selection and Design Evolution Report (October 2023))) during the Statutory Consultation period. In its Statutory Consultation response, the Council noted that whilst the previous and unacceptable options, which were included in the non-statutory consultation, have been discarded, the option put forward still has significant challenges. The Council continues to disagree with aspects of site and route selection such as the access options. Aspects of design such as the design of the converter station site have also not been agreed.	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))) is agreed.	Under discussion
3.23.7	Application Document 5.1.6 Appendix E Statutory Consultation Application Document 3.1 (E) draft Development Consent Order [CR1-027]	Coordination	<p>The Applicant must demonstrate accordance with National Policy Statement EN-5 2.15.1 which states that coordinated approaches to delivering offshore and onshore transmission, to minimise overall environmental, community and other impacts, as set out in detail in NPS EN-5, must be considered.</p> <p>The Council considers that project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate, co-locate, and consolidate infrastructure, both their own and other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment.</p> <p>Throughout the various consultation stages, the Council pressed the case that Sea Link should fully coordinate consenting, construction, and operation with the LionLink project, and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.</p> <p>The Council considers it essential for NGET to engage in discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated heavy goods vehicle ("HGV") movements, workforce numbers and traffic management on the highways network. Commonality on traffic and transport matters could be found through sharing Delivery</p>	<p>The Proposed Project is continually exploring opportunities for coordinating with other large scale infrastructure projects in Suffolk, such as LionLink. This is in terms of cable routes, noting that other projects are outside the control of National Grid. Whilst there are physical similarities between the infrastructure that would comprise the Proposed Project and the Lion Link interconnector project, the Proposed Project differs from the interconnector in terms of the type, purpose, need and geographical location outside of Suffolk.</p> <p>The Proposed Project will seek consent for its own works only however an illustrative coordinated masterplan showing one way in which converter stations for up to three projects could be accommodated on land near Saxmundham is provided with the DCO application (Application Document 3.1 (E) draft Development Consent Order [CR1-027]).</p> <p>The design of the Proposed Project includes Limits of Deviation that are sufficiently broad at the point at which they interact with the landscaping proposed SPR for East Anglia ONE North and East Anglia TWO to allow the final micro-siting of the Sea Link AC cable ducts to be deferred until a later time when the landscaping design for SPR is more certain. The Proposed Project has also coordinated with other projects and designed the HVAC cable route in a way that leaves sufficient space for LionLink to be constructed to the north, broadly along the same corridor (based on reasonable engineering assumptions and discussions with NGV's LionLink team).</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	Consultee’s Current Position	National Grid Current Position	Status
			<p>Management Systems or platforms for permitting highway works.</p> <p>Social, economic and environmental adverse effects are cumulatively increasing with each new project in the surrounding area. For local communities, this means a multitude of increasing impacts which affect their wellbeing. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate adverse social, environmental and economic effects, particularly in relation to community wellbeing.</p>		
3.23.8	<p>Application Document 7.12.1 Design Principles - Suffolk</p> <p>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3</p>	Design review process and masterplan	<p>The Consultee support the feedback from the Design Review Panel (DRP), particularly the point regarding a two-stage consent process that does not slow delivery but provides the controls required to result in high-quality design. Also, the DRP considers that design oversight during the post consent stage, would allow opportunity for National Grid to reengage with the DRP.</p> <p>This supports the legitimate concerns of the Consultee regarding the potential loss of design oversight.</p> <p>On the masterplan, the DRP recognised the critical importance of a strong masterplan to set a high benchmark for the site and any future projects. The Consultees state that the feedback necessitates revision of the proposed order limits at the converter station site to expand them.</p>	<p>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 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.</p>	Under discussion

3.24 Consultation

Table 3.24 Consultation

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	National Grid Current Position	Status
3.24.1	Application Document 5.1 Consultation Report [CR-069]	Consultation Strategy	Agreed The Council has since noted (e.g. in paras 3 and 15 of [RR-5209] that it has been disappointed with the quality of engagement with stakeholders during the pre-application phase and continues to emphasise the importance of effective and meaningful engagement with local authorities and local communities affected by the project.	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
3.24.2	Application Document 5.1 Consultation Report [CR-069]	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
3.24.3	Application Document 5.1 Consultation Report [CR-069]	Statement of Community Consultation	Agreed	The Consultees were consulted by National Grid on the Statement of Community Consultation and National Grid had regard to those comments.	Agreed

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 Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

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 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

Date	Topic/Engagement type/Attendees	Discussion points
16 October 2023	SCC, ESC and National Grid – Health and Wellbeing Meeting	Engagement relating to the PEIR – covered a high-level project overview, scope, methodology, baseline sources, sensitive receptors in relation to health and wellbeing.
08 December 2023	SCC, HE and National Grid - Archaeology Meeting	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 – Water Environment Meeting	Project program, engagement to date, FRA approach
18 January 2024	SCC, ESC and National Grid – Project Update Meeting	Project update, ground investigation, geophysical surveys, statutory consultation feedback overview, thematic meetings, PPA
05 February 2024	SCC, ESC and National Grid - Noise and Vibration Meeting	Engagement relating to the PEIR outcomes for noise and vibration and next steps.

Date	Topic/Engagement type/Attendees	Discussion points
06 February 2024	ESC, SCC and National Grid - Air Quality Meeting	Engagement relating to the air quality assessment methodology and statutory consultation feedback responses
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, PProW, 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

Date	Topic/Engagement type/Attendees	Discussion points
		<i>principles and landscape strategy, outline landscape and ecology management plan and questions</i>
28 February 2024	SCC, ESC and National Grid - Transport Meeting	<i>Transport meeting to provide a project update and to review statutory consultation (PEIR) feedback</i>
04 March 2024	SCC, ESC, EA and National Grid – Water Environment Meeting	<i>Previous meeting action progress, Sequential Test update, baseline flood risk data, River Fromus crossing, drainage design updates</i>
14 March 2024	SCC, ESC and National Grid – Project Update Meeting	<i>Current activity and surveys update, thematic meetings update, PPA, community benefits, ESO East Anglia Network Study findings</i>
21 March 2024	SCC, ESC and National Grid – Agriculture and Soils Meeting	<i>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.</i>
11 April 2024	SCC, ESC and National Grid - Project Update Meeting.	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>
24 April 2024	SCC, ESC, Natural England, National Landscape and National Grid – Landscape and Visual Meeting	<i>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.</i>
April 2024	National Grid, ESC and SCC – Ecology Information Shared	<i>The First season (2022-23) Breeding and Wintering bird reports for Suffolk were shared with ESC and SCC by National Grid for information.</i>
09 May 2024	SCC, ESC and National Grid – Project Update Meeting.	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>

Date	Topic/Engagement type/Attendees	Discussion points
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 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.
28 May 2024	SCC, ESC and National Grid Meeting – Landscape and Visual	Project update and timeline, LVIA and agreements, long distance cycling/walking routes, Design Mitigation, Co-location Illustrative Masterplanning update
May 2024	National Grid, ESC and SCC – Ecology Information Shared	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.
06 June 2024	National Grid, ESC and SCC – Landscape and Visual Information Shared (via email)	The Provisional Growth Rates, Suffolk Indicative Species Mix and oLEMP Draft Structure were all shared with ESC and SCC by National Grid for agreement.
07 June 2024	SCC, ESC, NE, 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 / Biodiversity Net Gain opportunities

Date	Topic/Engagement type/Attendees	Discussion points
13 June 2024	SCC, ESC and National Grid – Project Update Meeting.	Project update and timeline, thematic meetings, PPA, masterplanning
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

Date	Topic/Engagement type/Attendees	Discussion points
12 July 2024	National Grid, ESC and SCC - The Landscape and Visual Draft Landscape and Visual Information shared (via email)	Photosheet was shared with ESC and SCC by National Grid for agreement.
15 July 2024	National Grid, ESC and SCC - The Suffolk VP locations were Landscape and Visual Information shared (via email)	shared with ESC and SCC by National Grid for agreement.
16 July 2024	SCC, ESC and National Grid – Targeted Consultation – Transport/Public Rights of Way Meeting	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 - The photosheet template VP01 was Landscape and Visual Information shared (via email)	shared with ESC and SCC by National Grid for agreement.
02 August 2024	National Grid, ESC and SCC – The representative viewpoint Landscape and Visual Information shared (via email)	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 – The planting heights for mitigation Landscape and Visual Information (via email)	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

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

Date	Topic/Engagement type/Attendees	Discussion points
		<i>around design, compensation, mental health and coordination.</i>
<i>17 September 2024</i>	<i>SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting</i>	<i>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.</i>
<i>10 October 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The Suffolk Indicative Species Mix was shared with ESC and SCC by National Grid for agreement.</i>
<i>10 October 2024</i>	<i>SCC, ESC and National Grid – Project Update Meeting</i>	<i>Project update and timeline, thematic meetings, PPA, masterplanning</i>
<i>14 October 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The Draft Mitigation Design package was shared with ESC and SCC by National Grid for comment.</i>
<i>16 October 2024</i>	<i>National Grid, ESC and SCC – Air Quality information shared (via email)</i>	<i>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.</i>
<i>05 November 2024</i>	<i>Suffolk Design Review Panel</i>	<p><i>Formal review meeting with Suffolk Design Review Panel (run by Frame Projects). ESC provided briefing to Panel. SCC also in attendance.</i></p> <p><i>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</i></p>

Date	Topic/Engagement type/Attendees	Discussion points
		<i>with other National Grid Ventures projects, and the approach to integrating the buildings and access 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</i>

Date	Topic/Engagement type/Attendees	Discussion points
		<i>requested to be provided within 3 days post meeting.</i>
<i>25 November 2024</i>	<i>SCC and ESC Letter – Follow-up from DRP feedback</i>	<i>Joint letter from SCC and ESC with comments on the feedback from the Design Review Panel (DRP) and masterplanning.</i>
<i>27 November 2024</i>	<i>National Grid, ESC and SCC – Socioeconomics, Recreation and Tourism Information shared (via email)</i>	<i>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.</i>
<i>27 November 2024</i>	<i>National Grid ESC and SCC – Landscape and Visual Information (via email)</i>	<i>The Landscape and Visual Impact methodology was shared with ESC and SCC by National Grid for agreement.</i>
<i>November 2024</i>	<i>National Grid, ESC and SCC – Ecology Information</i>	<i>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.</i>
<i>December 2024</i>	<i>National Grid, ESC and SCC documents and information shared (via email)</i>	<i>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.</i>
<i>09 December 2024</i>	<i>SCC, ESC and National Grid - Meeting to follow-up on DRP (held on 05 November).</i>	<i>Discussion on masterplanning, design review panel meeting and design principles document.</i>
<i>11 December 2024</i>	<i>SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting (Suffolk proposals)</i>	<i>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.</i>

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.
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
10 October 2025	SCC, ESC and National Grid	Socio-Economics, Recreation and Tourism and Health and Wellbeing thematic meeting
16 October 2025	SCC, ESC and National Grid	Flood Risk and Drainage thematic meeting
21 October 2025	SCC, ESC and National Grid	Ecology thematic meeting to run through the Relevant

Date	Topic/Engagement type/Attendees	Discussion points
		<i>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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