



The Planning Act 2008

Application by National Grid Electricity Transmission for the Sea Link Project

East Suffolk Council's Relevant Representation on proposed changes (CR1) to the Sea Link Project

Deadline 3A Change request
(19 January 2026)

Application Ref.: EN020026

East Suffolk Council: [REDACTED]

1. Introduction

- 1.1 Following a request from National Grid Electricity Transmission ('the Applicant') on 26 November 2025 to make five proposed changes to the Sea Link Development Consent Order ('DCO') application (Change Request 1 ('CR1')) [\[CR1-001\]](#), the Examining Authority ('ExA') made a procedural decision on 5 December 2025 to accept all five of the proposed changes for examination [\[PD-015\]](#). A relevant representation and written representation period commenced on 9 December 2025, closing on 19 January 2026.
- 1.2 East Suffolk Council ('ESC') has reviewed the Applicant's CR1 (comprising documents [\[CR1-001\]](#) to [\[CR1-068\]](#)). Sections 2 to 6 of this submission provide ESC's Relevant Representation on each of the five changes in turn, namely:
- Change 1 - Change to access at the former Hoverport, Pegwell Bay, Kent
 - Change 2 – Change to limits of deviation for Friston (Kiln Lane) substation, Suffolk
 - Change 3 – Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk
 - Change 4 – Benhall Railway Bridge, Suffolk
 - Change 5 – Increase in area for maintenance of a new hedge to south of B1119

2. **Change 1 – Change to access at the former Hoverport, Pegwell Bay, Kent**

- 2.1 As Change 1 concerns the Kent Onshore Scheme, ESC defers to the Kent Local Planning Authorities.

3. **Change 2 – Change to limits of deviation for Friston (Kiln Lane) substation, Suffolk**

- 3.1 ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [\[CR1-052\]](#), which provides a description of, and rationale for, Change 2.
- 3.2 ESC notes that the Applicant has adjusted the limits of deviation for the proposed new substation at Friston (Kiln Lane) to align with those consented for the East Anglia ONE (North) ('EA1N') and East Anglia TWO ('EA2') offshore wind farm projects ('the SPR Consents'). Appendix B to the Change Request Report [\[CR1-052\]](#) provides a map showing the current and proposed limits of deviation for the substation.

- 3.3 ESC understands that the discrepancies between these plans arose due to a decision on whether to construct a Gas Insulated Switchgear ('GIS') or Air Insulated Switchgear ('AIS') substation (the latter requiring a larger footprint than the former) not having been made at the date of submission of the applications for the SPR Consents. As a result, the SPR Works Plans identified a larger area for the substation in case it was decided to build a larger AIS substation, rather than a GIS substation which has now been selected by National Grid.
- 3.4 As part of the detailed design process for the Friston (Kiln Lane) substation under the SPR Consents, the proposed location for the substation is within the works area for the SPR Consents, but not entirely within the limits of deviation shown on the Works Plans for the Sea Link project.
- 3.5 In Section 2.3 of the Change Request Report [[CR1-052](#)], the Applicant has supported its change request by suggesting that a number of benefits would arise if the limits of deviation shown on the Works Plans for Sea Link and for the SPR Consents were aligned. These include:
- reducing the complexity of plans for the site to aid interpretation;
 - providing reassurance to the local community that National Grid does not aim to produce a different design to that being progressed under the SPR Consents;
 - aiding the development of consistent plans showing, for example, landscaping and drainage around the substation; and
 - avoiding complications in the unlikely event that SPR begin but do not complete construction at the site.
- 3.6 ESC welcomes the fact that the Applicant is attempting to achieve a greater degree of clarity and consistency around the proposals for the substation at Friston, and recognises at least some of the benefits of the change, as outlined above.
- 3.7 ESC understands that the change would only provide greater flexibility over the specific location of the substation, with its size remaining as previously proposed.
- 3.8 Paragraph 2.3.6 of the Addendum to Volume 6 Environmental Statement [[CR1-055](#)] notes that the draft DCO was updated at Deadline 1 [[REP1-106](#)] to reduce the maximum height of the proposed substation from 18 m (as assessed in the Environmental Statement ('ES')) to 16 m to align it with the SPR Consents. However, it is stated that *'no change to the height of the proposed Friston (Kiln Lane) Substation, as assessed within the ES (i.e. 18 m), is proposed as part of this change'* and so *'the original EIA and this assessment have considered a worst case scenario and in reality the*

substation will be smaller than as assessed'. ESC has reviewed Table 3.3 of [CR1-055] and on the basis of the above is satisfied that Change 2 would not introduce any new or different significant environmental effects to those reported in the ES.

- 3.9 ESC notes the Applicant's statement at Paragraph 2.3.14 of the Change Request Report [CR1-052] that *'the change would make no difference to the drainage proposals for the site' as 'there is sufficient space within the Sea Link Order limits for National Grid to deliver the drainage that is currently being progressed to discharge requirements on the SPR consents and National Grid does not intend to deliver a different approach to drainage on the site as a whole compared to that being discussed with SPR'*.
- 3.10 During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC queried, in light of concerns raised by the ExA, whether the new Limits of Deviation do in fact align with those shown on the SPR Works Plans. It is noted that the Applicant has addressed this issue in Paragraph 2.3.19 of the Change Request Report [CR1-052]. ESC has undertaken an exercise to compare the Limits of Deviation shown on Drawing No. DCO/S/WK/PS/0402 of the updated Sea Link Works Plans [CR1-007] and those shown on Drawing No. EA2-GEN-DA-SPR-73 of the East Anglia TWO Works Plans ([REP11-004] of the East Anglia TWO Examination Library) and is satisfied that there is alignment between the two plans.
- 3.11 ESC has reviewed the Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 2 does not introduce any new or different likely significant environmental effects. ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).
- 3.12 In summary, ESC notes Change 2 and agrees that it will provide greater consistency and clarity for all parties. ESC would, however, in this context sound a cautionary note, to stress that the SPR Consents must be taken as the starting point for the Project's proposed embedded mitigation under a Scenario 2 connection, especially given the sensitivity of the location and its very clear impact on local communities.
- 4. Change 3 – Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk**

- 4.1 ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [\[CR1-052\]](#), which provides a description of, and rationale for, Change 3.
- 4.2 As set out in the 'Notification of Applicant's Intention to Submit Request for Proposed Changes to the Development Consent Order Application' letter [\[AS-138\]](#) dated 16 September 2025 ('the Notification Letter'), the Applicant initially proposed to amend the Order Limits to introduce a 30 m buffer between the amended Order Limits and a potential Neolithic hengiform monument feature recorded during trial trenching completed in July 2025. This would require additional land take to enable the underground cable to be routed around the feature.
- 4.3 During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC noted its support for Change 3 in order to ensure that the potential discovered Neolithic henge is avoided.
- 4.4 ESC notes that Change 3 has been revised since the publication of the Notification Letter, in light of further geophysical survey of the landscape completed in October 2025. The Addendum to Volume 6 Environmental Statement [\[CR1-055\]](#) submitted as part of CR1 states that the surveys indicated that the possible henge feature was actually '*a D-shaped enclosure rather than a henge*', and engagement with Historic England and Suffolk County Council's ('SCC's') Archaeologist concluded that the feature was only of regional, not national, significance, and was not of schedulable quality. ESC welcomes the Applicant's commitment in Paragraph 2.4.10 of the Change Request Report [\[CR1-052\]](#) to undertaking further evaluation trenching to better understand the enclosure and the surrounding archaeology.
- 4.5 As a result of these findings, the amended Order Limits now include the area of the enclosure to retain the option to route the cable route and haul road through the enclosure. ESC understands that the Order Limits in this area have been widened in response to requests from heritage stakeholders for the asset to be excavated should the option of routing the cable and haul road through the enclosure be selected, allowing information about it to be recorded.
- 4.6 It was also identified through the geophysical surveys that there are potential archaeological features of interest to the west of the feature, but not to the east. ESC therefore welcomes the Applicant removing the extension of the Order Limits to the west of the enclosure which was initially proposed in the Notification Letter. This means that the only option to avoid the feature would be to re-route the cable to the east of the enclosure, which has been enabled by the extended Order Limits to the east introduced by Change 3. ESC understands that this approach is supported by Historic England and SCC's

Archaeologist. Appendix C to the Change Request Report [[CR1-052](#)] provides a map showing the current and proposed order limits in the area.

- 4.7 ESC noted in response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request that the Applicant needed to assess the potential for Change 3 to introduce any new or materially different significant effects or pathways on topics other than heritage, including ecology and arboriculture, and if required, to secure suitable mitigation. ESC therefore welcomes the submission by the Applicant of an Addendum to Volume 6 Environmental Statement [[CR1-055](#)] as part of CR1.
- 4.8 To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 2 does not introduce any new or different likely significant environmental effects.
- 4.9 ESC acknowledges that the widening of the Order Limits may require the removal of additional field boundary vegetation compared to that originally identified in the ES. However, given the provisions for hedgerow replacement in the Outline Landscape and Ecological Management Plan (OLEMP), it is understood that the resulting effects will be temporary. Tree and hedgerow protection requirements can be adaptable and are covered by the agreed Arboricultural Impact Assessment provisions. ESC is therefore satisfied that the removal of additional vegetation as a result of Change 3 will not give rise to any new or different likely significant environmental effects.
- 4.10 ESC also notes the Applicant's conclusion that Change 3 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.
- 4.11 Whilst the Applicant has identified that Change 3 would result in additional human receptors falling within the construction dust study area, ESC agrees with the Applicant's conclusion that this does not change the conclusions of the ES with respect to Air Quality, as the mitigation measures already proposed in the ES chapter are for high-risk sites.
- 4.12 ESC notes the Applicant's conclusion that Change 3 may bring construction works closer to some nearby noise sensitive receptors on Snape Road. Notwithstanding the fact that ESC accepts that this should not alter the conclusions of the ES chapter, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects. As a consequence, these concerns equally apply to any effects on noise sensitive receptors on Snape Road. ESC's concerns are set out in Section 7.4 of its Local Impact Report ('LIR') [[REP1-128](#)] and are not repeated here, but the ExA will note that they include the proposed overall working hours, a lack of detail provided with respect to mitigation, reliance on

temporal restrictions, and the Applicant's proposed approach to the use of s.61 Control of Pollution Act applications.

- 4.13 ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).
- 4.14 ESC also requested in response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request that the results of survey work are reported during the course of examination. ESC therefore welcomes the Applicant's submission of a Geophysical Survey Report [[CR1-057](#)] and whilst ESC defers comments on this Report to SCC's Archaeological Service and Historic England, ESC would expect the Applicant to submit further survey results for consideration by all parties as investigations progress.

5. Change 4 – Benhall Railway Bridge, Suffolk

- 5.1 ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [[CR1-052](#)], which provides a description of, and rationale for, Change 4.
- 5.2 As set out in the Notification Letter [[AS-138](#)], the Applicant initially proposed to amend the Order Limits to include Benhall Railway Bridge, land along the highway to the east and west of the bridge between the A12 and Grays Lane/Forge Close, additional land to the east of the B1121, and a small stretch along the railway line. This would have provided the Applicant with three potential options for addressing the weight limit constraints posed by Benhall Railway Bridge, namely:
- Option 1: Installation of a 'mini-bridge';
 - Option 2: Minor works to repair the bridge; or
 - Option 3: Installation of a semi-permanent overbridge structure.
- 5.3 An outline planning application for the erection of up to 41 dwellings (ESC application reference: DC/21/2503/OUT) was approved on 28 October 2025 on the field to the east of the bridge. During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC advised that it will be for NGET to liaise with the landowner of the site to seek an appropriate solution regarding any proposed use of that land and the timing of doing so in the context of its proposals for Benhall Bridge.
- 5.4 ESC notes that the Applicant has engaged with the landowner to determine whether use of the site by NGET would be feasible. ESC understands that the

Applicant's CR1 no longer includes this additional land within the amended Order Limits, as the landowner would object to use of this area for a compound due to the potential for this to delay progression of the site for housing. Furthermore, as the site is allocated for housing in the Suffolk Coastal Local Plan, use of the site for a temporary construction compound would have an adverse effect on the delivery of the Council's five-year housing land supply. As a result, the previously considered Option 3 of installing a semi-permanent overbridge structure has been discounted by the Applicant, as this would require use of that site for a crane to lift the bridge into place. Appendix D to the Change Request Report [\[CR1-052\]](#) provides a map showing the current and proposed order limits in the area.

- 5.5 The Applicant states at Paragraph 2.5.14 of the Change Request Report [\[CR1-052\]](#) that *'National Grid was in discussions with East Suffolk Council to understand the position with this application and was similarly commencing discussions with the landowner on a potential land agreement and the status of the application; but East Suffolk Council had been unable to provide National Grid with guidance on the status of the application.'* This statement is unfortunately somewhat misleading and, in the circumstances, unhelpful. For clarification, the ExA should note that the actual order of events was that the Applicant contacted ESC's Case Officer for Sea Link on 4 September 2025, seeking information with respect to application DC/21/2503/OUT. ESC's Sea Link Case Officer subsequently sought details from the Case Officer for the application, and informed NGET on 26 September 2025 that *'the application is being prepared for committee determination before the end of the year, and that as an allocated site, it is one that will be recommended favourably'*. It follows, therefore, that ESC was, in fact, able to *'provide National Grid with guidance on the status of the application'*, albeit this was not received by the Applicant prior to its submission of its Notification Letter (noting this was less than two weeks following the Applicant's first enquiry to ESC).
- 5.6 It is noted that the Applicant states in Paragraph 2.5.21 of the Change Request Report [\[CR1-052\]](#) that the availability of the adjacent land is not necessary for the delivery of Option 1 (installation of a 'mini-bridge' within the highway boundary), nor Option 2 (minor works to repair the bridge). Nevertheless, the Applicant acknowledges at Paragraph 2.5.6 of the Report that, for Option 1, *'reduced highway closure durations may have been possible if this adjacent land was available, and it would potentially avoid the bridge being transported to and from an off-site location between uses'*.
- 5.7 ESC considers that had the Applicant proactively sought to address the weight limit constraints of Benhall Railway Bridge as soon as the issue became apparent during the pre-application stage, a solution may have been achievable. Whilst ESC defers to SCC as the Local Highway Authority

regarding whether Options 1 and 2 are indeed feasible without the availability of the adjacent land now consented for residential use, ESC is concerned that the Applicant's initial reluctance to address this problem has resulted in a potential increase in anticipated disruption for a community that is already experiencing significant delays and disturbance due to the construction of Sizewell C and other Nationally Significant Infrastructure Projects ('NSIPs') in the District. These are serious concerns which ESC (and SCC as the Local Highway Authority) have both previously raised with the Applicant in project meetings on numerous occasions prior to this Change Request response being submitted and do strike at the potential prematurity of this project.

- 5.8 Whilst noting the Applicant's somewhat belated attempts to address what are long-standing and serious concerns of both ESC and SCC regarding the feasibility of the use of Benhall Railway Bridge for access to the converter station site, ESC still remains extremely concerned by the considerable level of disruption and disturbance to the local community which this aspect of the project will inevitably create.
- 5.9 Furthermore, in light of the above, ESC does question where the Applicant is proposing to site the temporary construction compound now that the adjacent land consented for residential use cannot be included in the revised Order Limits. ESC understands that Option 1 '*could be completed entirely within the highway*', but Option 2 '*would require establishment of a temporary compound*' (see Paragraphs 2.5.6 and 2.5.8 of [\[CR1-052\]](#)). Whilst ESC acknowledges that Schedule 1 of the DCO [\[CR1-027\]](#), if made, would permit the Applicant to establish site construction compounds anywhere within the Order Limits, subject to assessment of effects, ESC requests an explanation from the Applicant as to its intentions in this respect and in particular comprehensive details as to where it proposes to site the compound so as to be able to provide ESC with confidence that Option 2 is deliverable in both practical and environmental terms.
- 5.10 ESC has reviewed the Addendum to Volume 6 Environmental Statement [\[CR1-055\]](#) submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied, subject to its comments above, that Change 4 should not introduce any new or different likely significant environmental effects.
- 5.11 The additional land required for construction activity around Benhall Railway Bridge will potentially lead to some minor self-seeded tree removal. ESC considers that this will only have a very localised impact on visual amenity, but not to any significant extent. ESC is, therefore, satisfied that Change 4 does not give rise to any new or different likely significant visual effects.

- 5.12 ESC agrees with the Applicant that both Option 1 and Option 2 would not affect the setting of the nearest listed building (Grade II listed Benhall Cottage) due to the distance between them, the intervening vegetation, and the scope of the works.
- 5.13 ESC also notes the Applicant's conclusion that Change 4 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.
- 5.14 As noted for Change 3, whilst the Applicant has identified that Change 4 would result in additional human receptors falling within the construction dust study area, ESC agrees with the Applicant's conclusion that this does not change the conclusions of the ES with respect to Air Quality, as the mitigation measures already proposed in the ES chapter are for high-risk sites.
- 5.15 ESC acknowledges the Applicant's conclusion that Change 4 may bring construction works closer to some nearby noise sensitive receptors on Shotts Meadow to the northeast and Whitearch Park Residential Park Homes to the south. In this context, as noted for Change 3, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects, as set out in Section 7.4 of its LIR [\[REP1-128\]](#). These concerns apply equally to any effects on noise sensitive receptors on Shotts Meadow and Whitearch Park Residential Park. ESC requires further detail with respect to the Applicant's proposed mitigation before it can be confident that the works can be properly controlled so as to avoid significant adverse effects on these receptors.
- 5.16 It is noted that the proposed works will, if approved, require temporary closures of the B1121 and the Applicant acknowledges that there is the potential for new severance impacts between residents and community facilities, businesses, and open spaces. ESC defers to SCC, as the Local Highway Authority, with regards to the Traffic and Transport assessment, but will expect any adverse impacts to be minimised and mitigated, particularly given the widespread disruption already facing the local community as a result of other NSIPs in the area.
- 5.17 ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).
- 5.18 Subject to the concerns expressed above, should Option 2 be deemed feasible in terms of practicability and environmental assessment by the Applicant and relevant stakeholders, including SCC as the Local Highway Authority, ESC acknowledges that this option would provide a permanent solution for access to the co-located converter station during the construction and operation of any future consented projects.

6. Change 5 – Increase in area for maintenance of a new hedge to south of B1119

- 6.1 ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [[CR1-052](#)], which provides a description of, and rationale for, Change 5.
- 6.2 ESC understands that the Applicant has widened the strip of land south of the B1119 to provide the necessary space to maintain the existing concrete drain that lies adjacent and parallel to the road, and to enable National Grid to maintain the planting if not maintained by the landowners. Appendix E to the Change Request Report [[CR1-052](#)] provides a map showing the current and proposed order limits in the area.
- 6.3 ESC welcomes this change being made in response to engagement with the landowner and recognition of the concerns raised regarding the potential for the drain to become blocked and the road to become flooded if it was not possible for the ditch to be maintained from the field to the south.
- 6.4 As set out in Paragraph 6.3.8.9 of ESC's Local Impact Report [[REP1-128](#)], ESC had hoped that this change would also address its concerns about the size of the Order Limits to the north of the converter station site and whether they were of a sufficient size and extent capable of accommodating the necessary mitigation planting along the B1119 required to screen views of the converter station from the north/northeast. The ExA should be aware that ESC is proposing wholesale revisions to the B1119 and Fristonmoor Lane planting such that it incorporates more than just hedgerows but includes multi-species tree belts to achieve genuinely effective screening. However, Change 5 would instead only achieve improved maintenance access for the hedgerow and ditch. In light of this, ESC considers this change to be a missed opportunity and, in its response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, asked the Applicant to increase the Order Limits south of the B1119 to accommodate this additional planting. ESC is disappointed that the Applicant has not acted upon this feedback – which raises serious concerns as to the practical effectiveness of the landscaping now proposed.
- 6.5 Although the Sea Link project is a Nationally Significant Infrastructure Project, the detrimental and adverse impacts are focussed on and felt by the local communities forced to host or live with the Project if consented. It is absolutely critical that adequate landscape mitigation planting is provided so as to reduce the very clear and obvious landscape visual impacts that will be created by the project. Such planting should be a mix of native tree and shrub species to create a multi-tiered tree belt, ideally at least 10m wide. Tree and shrub

species should reflect local landscape character and growing conditions. The B1119 sits at an elevated location when looking south and east across the proposed co-located converter station site on land east of Saxmundham. The new development will be both very visible and intrusive and this location demands comprehensive landscaping. ESC fails to understand why the Applicant has refused to provide the screening landscaping which is patently required.

- 6.6 ESC has reviewed the Addendum to Volume 6 Environmental Statement [\[CR1-055\]](#) submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 5 does not introduce any new or different likely significant environmental effects.
- 6.7 The revised Order Limits include additional land from Redhouse Christmas Tree Farm in Sternfield, and any Christmas trees planted within the revised Order Limits will be removed as necessary to facilitate maintenance of the hedgerow and ditch along the B1119. It follows, therefore, that there will inevitably be a potentially adverse impact on the current business, specifically impacts on the planted Christmas tree stock. ESC understands from the Consultation Report [\[CR1-069\]](#) that the business owner has raised concerns, and so ESC considers that the views of the business owner should be considered in determining whether or not Change 5 would result in any new or different likely significant effects on the business compared to those set out in the submitted DCO application.
- 6.8 ESC also notes the Applicant's conclusion that Change 5 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.
- 6.9 ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).

7. Conclusion

- 7.1 ESC has reviewed the Applicant's CR1 (comprising documents [\[CR1-001\]](#) to [\[CR1-068\]](#)). Subject to the comments made above, ESC is satisfied, to the extent that environmental topics fall under ESC's remit, that CR1 should not give rise to any new or different likely significant environmental effects compared to those reported in the ES.
- 7.2 In particular, however, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects, as set out in Section 7.4 of its LIR [\[REP1-128\]](#). The Applicant notes in the Addendum to Volume 6 Environmental Statement [\[CR1-055\]](#) submitted as part of CR1 that new or different likely significant adverse effects are not

predicted as a result of CR1, '*particularly with the implementation of best practicable means*'. This is not a satisfactory response and ESC continues to request actual detail as to what the Applicant proposes in terms of "best practicable means" mitigation which is a term too often used as a means to avoid the provision of practical detail. Without this information ESC cannot be confident that the proposed works can be controlled so as to avoid significant adverse effects.

- 7.3 In addition, ESC wishes to reiterate its concerns regarding the disruption that the Applicant's options to address the weight limit constraints of Benhall Railway Bridge would cause for the local community. ESC considers this disruption could have been meaningfully reduced had the Applicant sought to address the issue at an earlier stage and, for the reasons stated above, is not satisfied with the position as currently presented by the Applicant.
- 7.4 Finally, ESC is extremely disappointed that the Applicant has failed to use the opportunity presented by Change 5 to extend and enhance its landscape planting along the B1119 to increase the Order Limits south of the B1119 to accommodate multi-species tree belts along the B1119 and Fristonmoor Lane planting to achieve genuinely effective screening.