

# SEA LINK

EN020026

Relevant Representation on Change  
Request 1 application

Suffolk County Council

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## Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Loads</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>HVAC</i>	<i>High Voltage Alternating Current</i>
<i>HVDC</i>	<i>High Voltage Direct Current</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>
<i>TCPA</i>	<i>Town and Country Planning Act 1990</i>

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

## Purpose of this Document

The document has been prepared by Suffolk County Council to provide a response following the Examining Authority's acceptance, under the Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 – rule 8(3), rule 9 and rule 17 of the Applicant's request for proposed changes to the Development Consent Order application and notice of variation to the Examination timetable.

## 1 Introduction

- 1.1 The Sea Link proposals consist of the construction of a 2 Gigawatt (GW) High Voltage Direct Current (HVDC) undersea electricity link between Suffolk and Kent which will connect to Kiln Lane substation in Friston, which has consent via an existing Development Consent Order (DCO) obtained by a third party, Scottish Power Renewables (SPR), but as yet is unbuilt.
- 1.2 The offshore scheme consists of a 122 kilometre (km) subsea cable which will run between a Suffolk landfall location between Aldeburgh and Thorpeness and the Kent landfall at Pegwell Bay.
- 1.3 The onshore scheme consists of the installation of a High Voltage Alternating Current (HVAC) 1.9km underground cable between Kiln Lane substation in Friston, a 2GW HVDC converter station near the town of Saxmundham up to 26 metres (m) in height, and a 10km HVDC underground cable between the converter station and transition joint bay approximately 900m from shore, which will enable the transition from offshore to onshore technology.
- 1.4 On 16 September 2025, the Applicant gave notice to the Examining Authority (ExA) of five proposed changes to the Sea Link Development Consent Order (DCO) application.

## 2 Proposed Changes to the Sea Link Development Consent Order (DCO)

- 2.1 On 5 December 2025, the ExA confirmed acceptance of the proposed changes, following the receipt of documents [CR1-001] to [CR1-070] which contained the five proposed changes: -
  - Change 1 – Change to access at the hoverport, Kent
  - Change 2 – Change to the 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 – Change to the Order Limits at Benhall Railway Bridge, Suffolk
  - Change 5 – Increase of area for maintenance of a new hedge to south of B1119
- 2.2 This representation will only focus on proposed changes 2-5, which are relevant to the Suffolk locations within the DCO.

### **3 Change 2 – Changes to Limits of Deviation at Kiln Lane (Friston) Substation**

**3.1** The applicant has proposed an extension of the limits of deviation for Work 1B (the consented Kiln Lane substation in Friston) to align with the area which was presented for the same substation under consented the East Anglia One North and Two DCOs. The change includes an amendment to Work 4 (Suffolk temporary work compounds) to reflect the change to the substation area.

#### **General Comments**

**3.2** The Council generally welcomes the alignment of Kiln Lane substation under this application through Scenario 2 with that which was consented under the SPR EA1N and EA2 DCOs. Alignment of the Limits of Deviation of the substation with SPR's reduces confusion and uncertainty amongst communities over competing consents for the same piece of infrastructure.

**3.3** Aligning the Limits of Deviation should also facilitate a more effective approach towards landscape mitigation of the substation as SPR's proposals can now be more easily be incorporated into the Applicant's proposals. The Council reserves further comment on this matter once the Applicant's proposals are put forth.

**3.4** However, the environmental implications of the change such as in terms of landscape and vegetation must be adequately considered as detailed below.

#### **Landscape and Visual**

**3.5** The Council has concerns that the final location of the substation at Friston could result in additional vegetation loss, by affecting H558S\* as well as H557S\* (Sheet 04 of Tree Protection Plan [CR1-064]) and queries why both hedges are currently shown as fully removed.

**3.6** Any additional vegetation loss will need to be documented and mitigated or compensated as required.

**3.7** The impacts of the degree of flexibility and subsequent uncertainty on mitigation planting required as part of the delivery of other projects in this location (SPR substation) need to be fully documented and assessed.

#### **Lead Local Flood Authority**

**3.8** The LLFA does not object to the proposed change.

## 4 Change 3 – Minor Change to the Order Limits South East of Friston, Suffolk

4.1 The Applicant has proposed to adjust the proposed Order Limits along the route of the new underground cable to the southeast of Friston to provide additional flexibility for the route to minimise the impact on archaeological assets.

### Archaeology

4.2 At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ, following the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable.

4.3 However, given the potential to contain settlement evidence and other remains, SCCAS would advise that a partial excavation of just the central portion of this feature would not be appropriate or in line with best practice and this monument would therefore need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route. The original Order Limits (prior to Change 3) would not allow for this meaning an expansion of the Order Limits is necessary to facilitate full excavation of the enclosure and any associated internal and external remains. This would, however, only need to be a localised expansion. The proposed change would also allow for both options to be retained should the final routeing be decided post-consent. SCCAS, therefore, does not object to the expansion of the Order Limits in line with the areas proposed in Change 3.

4.4 SCCAS are pleased that geophysical survey and trial trenched evaluation has now been completed for these new areas (the additional geophysical survey report has now been submitted and SCCAS are happy to approve this document, and although the additional trial trenched evaluation report is pending, SCCAS have monitored the results of this work in person in the field). Although some additional archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be required in this section of the cable corridor, there is a suitable alternative route which would

avoid the enclosure entirely and not impact upon any archaeological remains of national significance.

### **Landscape and Visual**

4.5 The Council notes that the change is likely to result in additional loss of field boundary hedgerows, as is indicated on Sheet 05 of the Tree Protection Plan [CR1-064]. SCC welcomes that the existing trees along Snape Road are shown as being retained (this is also referred to in Table 3.6 Review of other Volume 6 assessment conclusions as a result of Change 3, [CR1-055]). However, SCC is concerned that this may need to be revised, once visibility splay requirements are being considered, and seeks reassurance that these trees can in fact be retained. Any additional vegetation losses will need to be documented and mitigated.

### **Public Health**

#### *Air Quality*

4.6 SCC acknowledges the Applicant's conclusion that the proposed change to the Order Limits does not alter the outcome of the construction dust assessment, given that the mitigation measures identified in the Environmental Statement are already based on a high-risk scenario. However, noting that the revised Order Limits may result in works being closer to human receptors, SCC expects that dust levels will be actively monitored in accordance with the relevant management and monitoring plans, including [AS-129]. Where monitoring identifies dust levels approaching or exceeding relevant benchmarks or legal targets, effective and timely mitigation measures should be implemented to minimise potential impacts on nearby receptors.

#### *Noise and Vibration*

4.7 SCC notes the Applicant's position that, whilst the proposed change may bring construction works closer to some noise sensitive receptors on Snape Road, significant adverse effects are not anticipated due to separation distances and the application of best practicable means. Nevertheless, given the potential for works to be located closer to residential receptors depending on final siting within the proposed order limits, SCC expects that noise and vibration effects will be monitored in accordance with the commitments set out in [AS-109] and [AS-131]. Appropriate mitigation should be implemented where monitoring indicates exceedances of thresholds or where impacts are greater than predicted, to ensure the protection of residential amenity and health.

#### *Health and Wellbeing*

4.8 SCC considers Applicant's conclusion that there would be no new or different likely significant effects on health and wellbeing would benefit from further

explanation. Whilst the Applicant describes the change as being of a “*minor nature*”, the extension of the Order Limits has the effect of bringing construction activities closer to additional human receptors. From a public health perspective, this warrants clearer consideration of potential pathways to health effects, including exposure to construction noise, vibration, dust, and associated stress or disturbance. SCC therefore recommends that the Applicant set out how health and wellbeing considerations have been reviewed in light of the revised receptor distances, including confirmation that existing mitigation and monitoring measures remain sufficient to protect health, and that appropriate mechanisms are in place to respond to any unanticipated effects during construction.

## 5 Change 4 – Benhall Railway Bridge

- 5.1 The Applicant has proposed to extend the order limits to include land along the B1121, including the Benhall Railway Bridge and a small area along the railway line, into the Order Limits. The change is proposed to provide certainty on the consenting route for works to allow the transport of Abnormal Indivisible Loads (AILs) over the bridge and enable works to undertake repairs should this be the best solution.

### General Comments

#### Lack of adequate exploration of alternatives

- 5.2 The Council continues to have concerns regarding the feasibility and acceptability of using the B1121 and the Benhall Railway Bridge as an access route for construction traffic (in particular Abnormal Indivisible Loads (AIL) movements). If an acceptable solution cannot be identified, the Applicant will be unable to construct the project. The Council has discussed this issue with Applicant on many occasions and urged them to consider further changes to the project, in addition to or as alternatives to Change 4, including potentially increasing the order limits elsewhere to accommodate an alternative access route, if the preferred route via the B1121 is not deliverable. Such alternative routes could utilise, in part, the Sizewell Link Road to provide access to the converter station site from the north (instead of via the B1121 from the south).
- 5.3 The Council understands that the Applicant is considering two options regarding utilising the Benhall Railway Bridge, acknowledging it has a weight limit of 46 tonnes. These options consist of the temporary installation of a mini-bridge for each AIL movement (Option 1) and the repair of the existing bridge (Option 2).
- 5.4 The option of constructing a new bridge should also be explored by the Applicant and provision should be considered in the revision of the Order Limits to allow for this option should it be required. It is possible that constructing a new bridge may

be more feasible than repairing the existing bridge and a more resilient solution than temporary overbridging when considering the need of Lion Link and any future projects requiring access to the converter station site. The Council recommended that the Applicant consider and explore this option during pre-examination engagement as additional land to the north would likely be needed to implement this solution.

Lack of detail on proposed options including feasibility and associated impacts

- 5.5 The Council cannot comment at this stage on the feasibility of any options for bridge repair or replacement on account of a lack of detail. Likewise, the Council considers that the potential adverse impacts of both options have not been satisfactorily assessed.
- 5.6 The Council requires further detail of the options sought by the Applicant to demonstrate their feasibility and show that vehicular access to Whitearch Residential Park won't be affected. This detail is also needed to validate the Applicant's assessment and claims in [CR1-055] that no likely significant effects will occur as a result of the change.
- 5.7 The Council has particular concern around the potential impacts on residents of Whitearch Residential Park in terms of connectivity for pedestrians and the associated health and wellbeing impacts, potential impacts from noise and vibration and a lack of detail on how the taxi/shuttle service will be implemented including its frequency and whether users will have to incur any cost. Further detail on these concerns is given in this section.
- 5.8 There is concern around the removal from the Order Limits of the additional parcel of land to the east of the bridge between the notification of the Applicant's intention to submit the change request [AS-138] and the subsequent submission (as detailed in [CR1-052]). Paragraph 2.1.40 of [AS-138] states that Option 2 requires a nearby construction compound and that the additional land is included "to enable consideration of this option". Therefore, the Applicant's position in [AS-138] appears to be that the additional land is required for Option 2 to be implemented. Paragraph 2.1.38 also states that additional land would reduce adverse effects arising from Option 1.
- 5.9 However, paragraph 2.5.21 of [CR1-052] states that additional land is not necessary for the delivery of Option 2. No further detail is given explaining why this is the case nor how Option 2 would be delivered without the additional land. Without these details, the Council cannot be assured that the works needed to deliver Option 2 will be feasible within the Order Limits even if the bridge were in a state where repair is possible.
- 5.10 The Applicant should, therefore, explain why the additional land was previously required to consider and deliver Option 2, and why it is now not considered

necessary by detailing how the works could be undertaken without additional land. To be clear, SCC did not request for the additional land to be included in the Order Limits; rather, the Council merely raised concern about whether the Applicant could deliver repairs, reconstruction or temporary overbridging within the limits of the public highway.

- 5.11 The Council considers that, out of the two options, Option 2 should be preferred on account of its comparative benefits in terms of delivering highway improvements and long term resilience for access to the site which would avoid the need for future repeated closures. The Council holds this position with the caveat that the extent of works needed to repair the bridge is not yet known and any residual impacts of these works must be considered.
- 5.12 The benefits of Option 2 are recognised by the Applicant in paragraph 2.1.39 of [AS-138]. Moreover, paragraph 6.2.49 of the coordination document [APP-363] details the potential for coordination over site access between Sea Link and Lion Link due to the benefits of both schemes using the same access route in terms of minimising adverse environmental impacts.
- 5.13 As recognised by the Applicant, delivering Option 2 is subject to the extent of the works required and the potential impacts on the railway line below the bridge. However, it is not clear that, were these hurdles to be overcome and agreement with SCC and National Rail reached, there will be a preference for Option 2 to be delivered. The Applicant should, therefore, commit to Option 2 as the preferred option unless overriding considerations related to feasibility, impacts on the railway line and other residual impacts dictate otherwise.
- 5.14 There should be provision to avoid the possibility of the scenario where the works are feasible and agreement between relevant stakeholders is/would be reached to implement Option 2 but Option 1 is nevertheless implemented. The Council considers the cited benefits and lower long-term reduction in required closures of the bridge, minimising adverse traffic and transport impacts for this access route, to warrant such a provision. Otherwise, the number of closures from Option 1, which requires a longer overall duration of closure than Option 2 from Sea Link alone, would effectively double due to the need for Lion Link to also transport AILs over Benhall Bridge. Similar concerns exist over other future projects connecting to Kiln Lane substation requiring their own AIL movements in addition to any additional AIL movements required during the operational phase of Sea Link.

### **Archaeology**

- 5.15 SCCAS has no objection to the proposed changes to the order limits, however any new scheme areas will need to subject to a programme of archaeological assessment, in this instance trial trench evaluation, followed by mitigation as appropriate, prior to any pre-commencement or construction works.

## **Ecology**

- 5.16 The Council has concerns regarding the proposed change due to the potential impacts on bats, birds and badgers that could result from any works from the additional land included within the order limits.
- 5.17 It is essential that new areas of habitat which will be impacted by the works are assessed for bird, bat and badger interest and appropriate mitigation measures drafted. The vegetation on either side of the railway line has high potential to be used as a migration/foraging corridor and this needs to be fully assessed, even if the bridge has low potential to be used as a bat roost.
- 5.18 The proposed works should also be assessed in terms of their potential impacts on the nearly Benhall Green Meadows County Wildlife Site, which is designated for its marsh grassland habitat.
- 5.19 Change Request Addendum Section 1: SCC Ecology are in agreement with the statement in paragraph 1.5.2. It is essential further surveys for bats and badgers are carried out within the vicinity of Benhall Bridge. A survey to assess the habitat suitability for Dormice should also be undertaken given the two records of dormouse nests in the local area.
- 5.20 REP01-47 – regarding surveys for bats at Benhall Bridge. The impact of the proposed vegetation removal at this location on migrating/foraging bats needs to be fully assessed given the vegetated embankments along the railway line in this area have moderate-high potential to be used as a migration/foraging route.
- 5.21 Section 3.6 – increase in area for the maintenance of a new hedge south of the B1119 – SCC Ecology have no comments on this particular section of the addendum.

## **Emergency Planning**

- 5.22 Emergency Planning continues to have a concern at the cumulative effects of the various NSIPs on the ability of the Emergency Services to respond effectively to an incident at Sizewell B. Any changes to the access route to the converter station site or upgrades or temporary overbridge options to the Benhall railway bridge must be accompanied by a traffic survey to consider the implications and potential impacts, particularly delays or disruption on the A12 or B1119 which are used by the Emergency Services to approach Sizewell B station.

## **Highways**

- 5.23 If works are proposed at the Benhall Bridge, the Council concurs that the Order limits would need to be extended to include the necessary land, but it does have concerns as to whether suitable works to improve the Bridge are feasible within the revised Order limits as currently proposed.

5.24 If the bridge is to revert to its existing state, no loads greater than 46 tonnes would be able to access the onshore infrastructure including the converter station site during the operational phase without further closures for further mini-bridge installations.

Need for further detail on the change and its effects

5.25 SCC notes that details of any temporary bridge have not been shared with the authority beyond a limited set of ‘feasibility option’ slides so SCC cannot comment on its acceptability nor on the assessment of the impacts such as access to Whitearch Residential Park. SCC is concerned that the lack of detail inhibits any review by it as highway authority or other by interested parties and that any future decision making will be fettered by powers granted to the Applicant in the DCO.

5.26 Without sight of the details of the temporary bridge SCC cannot comment further on this matter other than to repeat concerns about the geometry of the site and the structure which make such an installation challenging.

5.27 As the weight limit includes all AILs in terms of weight (i.e. STGO 1 to 3 and special order movements) SCC would ask that all vehicles exceeding 44 tonnes have been identified by the applicant as these include cranes and low loaders that fall into the STGO1 or 2 categories by weight.

5.28 SCC challenges some of the statements made by the Applicant on page 32 of the Applicant’s Consultation Report [CR1-069]. The Applicant states that “there is a weight restriction placed on the bridge indicating it would not be suitable for very heavy Abnormal Indivisible Load (AIL) vehicles”. It should be noted that the restriction is for all vehicles exceeding 46 tonnes so includes most STGO1 to 3 and special order movements, not just the very heaviest AILs.

5.29 A similar issue applies to the information given to the Applicant by the Council regarding the condition and weight restriction of the bridge. Whilst the current weight restriction is relatively new, the Applicant was previously made aware of the prior weight restrictions on the bridge at several points during the Council’s pre-application engagement including in response to the project’s Statutory Consultation (see paragraph 8.49). It was made clear at the time that the previous restrictions would inhibit AIL movements and that uncertainties over the bridge’s condition meant it posed a significant risk to the project should it be relied upon for AIL access.

5.30 The Applicant has provided an Approval in Principle (AiP) to undertake investigation of the bridge. SCC are in the process of commissioning its highway consultant to review the AiP.

5.31 SCC’s preference would be repairs to or reconstruction of the Benhall Rail Bridge subject to the disruption to local residents, road and rail users not being considered unacceptable.

### Cumulative effects

5.32 The Addendum to the Environmental Statement [CR1-055] is insufficient in highways terms particularly in terms of cumulative impacts. Table 3.7 states that “the proposed change is unlikely to alter the Proposed Project’s interaction with other developments”. Little detail is given to justify this statement which the Council strongly disagrees with. In the same document, the Applicant goes on to assess the impacts of closure of the Benhall Railway bridge in terms of redistribution of traffic. This will inevitably interact with cumulative developments due to their use of the A12 and other assessed receptors.

5.33 The Council has particular concerns around the potential interactions from Change 4 with Lion Link, EA1N, EA2 and Sizewell C which should be fully captured in the cumulative effects assessment with appropriate mitigation explored. Firstly, each of these projects will use the A12 for their construction traffic which will interact with the diversion route proposed by the Applicant as shown in [CR1-011]. An increase in traffic using the A12/B1119 junction, along with the traffic arising from cumulative developments may cause increased delay through fewer opportunities for gaps to pull out into. This is more concerning in terms of road safety where drivers may become impatient and take greater risks at the junction which poses significant safety concerns when factoring in the higher concentration of HGVs arising from cumulative developments. It is essential for these effects to be assessed, and the mitigation hierarchy followed.

5.34 Lion Link proposes to use the same access route as Sea Link as set out in the project’s Statutory Consultation documents. Under Option 1, the Lion Link applicant would most likely have to either use a mini-bridge or repair the bridge which means further closures would be required. However, under Option 2, no further closures would be required as the bridge would be in a suitable condition for AIL deliveries. This means that the adverse impacts arising from closures of the bridge will be felt for a much longer duration under Option 1 especially when considering the potential for future projects to use this access route. The Applicant’s cumulative effects assessment should be updated to reflect this.

5.35 There is also potential for non-HGV traffic from cumulative developments such as EA1N, EA2 and Sizewell C to use the B1121 as an access route. These movements would have to be diverted during closures of the Benhall Bridge which should also factor into the Applicant’s cumulative effects assessment.

### Concerns on updated assessment in [CR1-055]

5.36 The Council is concerned that the Applicant’s assessment does not accurately capture the likely effects under a worst-case scenario. The diversion route is shown as going via Saxmundham and the A12/B1119 junction [CR1-011]. SCC has noted concerns about safety at this junction and congestion / safety at the

Saxmundham crossroads such as in paragraph 11.122 of [REP1-130]. It is unclear how this receptor is forecast to experience less traffic in [CR1-055] when the B1121 is closed as more vehicles would likely have to use the B1119 A12 exit to access areas otherwise reached using the B1121 which would mean increased use of this signalised junction. This concern is amplified when considering the need for any traffic from cumulative developments using the B1121 to be diverted and the other concerns on cumulative effects detailed by the Council above.

5.37 It is unclear if the Applicant will be intending that construction traffic using the River Fromus Bridge will be using this diversion when the temporary bridge is being installed or in place and if these additional movements have been included in accessing the junctions and the route.

#### Suitability of diversion routes for non-motorised users (NMU)

5.38 SCC notes that if the road is closed diversion routes for pedestrians, wheelchair and cyclists are impractical due to their length. At present no mitigation is proposed to resolve this matter. Nor details of the duration that access will be denied.

#### Consideration of alternative routes

5.39 SCC notes that the Applicant discounted the use of the route which would leave the A12 at Yoxford and utilise the new Sizewell Link Road (SLR) due to concerns that the SLR and associated level crossing works would not be completed in the time for the Sea Link converter station works. The latest information SCC has is that the construction of the SLR will commence during Q1, 2026 with completion towards the end of 2027.

#### Inclusion of additional land at Benhall

5.40 Contrary to the Applicant's statement in paragraph 4.2.12 [CR1-052], SCC did not request inclusion of additional land at Benhall. It is not the authority's role to instruct applicants on what land they do or do not require to be included within the order. The authority did raise concerns about whether the applicant could deliver repairs, reconstruction or temporary overbridging within the limits of the public highway. These remain.

#### **Landscape**

5.41 SCC welcomes the documents 9.76.5.7 Change Request Appendix G Tree Survey Report Schedule Extract Suffolk Onshore Scheme [CR1-062] and 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme [CR1-064], but notes that the tree identifiers in the drawings differ from those in the tree survey table ( for example T1176\* on the drawing could not be found in the table, only T1176S\*). It would be helpful, if the 'S' could be explained, as it is not currently listed in the Key to Abbreviations & Terms Used in the Survey.

5.42 Any vegetation losses will need to be documented and mitigated.

## Public Health

### Air Quality

5.43 SCC acknowledges the Applicant's conclusion that the proposed changes at Benhall Railway Bridge introduce additional sensitive human receptors to the construction dust and traffic study areas, but that the overall conclusions for these topics are "*not significant*" and "*no potential for any new or different likely significant effects*" respectively. Noting the revised Order Limits may increase proximity of works to residential properties, including Shotts Meadow, Mill Lane and Festival Close, as well as residential park homes and locations subject to current planning applications which do not appear to have been considered, it is suggested that the increased proximity warrants clearer consideration and justification to support the conclusions.

5.44 Given the proximity of these receptors, and the sensitivity of residential park homes due to their construction type, SCC expects that dust and air quality impacts will be closely monitored in accordance with the relevant management plans, with a clear mechanism for the prompt implementation of additional mitigation should monitoring identify elevated levels or sustained impacts. SCC also notes the reliance on annualised traffic flow assessments, from a public health perspective, reassurance would be strengthened by confirmation that short term, localised air quality impacts arising from repeated temporary road closures and diversions have been adequately considered for nearby residents.

### Noise and Vibration

5.45 SCC notes the Applicant's position that the proposed change would not alter the conclusions of the ES in respect to noise and vibration, despite construction activities being brought closer to noise sensitive receptors at Shotts Meadow and Whitearch Park Residential Park Homes. Whilst it is acknowledged that best practicable means should "*reduce effects*", SCC remains concerned that residential park homes represent a particularly vulnerable receptor due to likely lower acoustic insulation and increased susceptibility to vibration impacts. SCC also notes that sites referenced in current planning applications do not appear to have been included within the assessment of affected receptors.

5.46 Given the proximity of receptors and the potential duration and intermittency of bridge works, SCC expects that noise and vibration monitoring will be undertaken proactively, with mitigation measures escalated where impacts exceed appropriate thresholds or cause prolonged disturbance. Particular attention should be given to night time, early morning or weekend working, which may have disproportionate effects on health, wellbeing and residential amenity.

## Health and Wellbeing

5.47 SCC notes that the Applicant acknowledges the revised Order Limits are adjacent to residential properties not previously assessed in the ES, but concludes that no new or different likely significant environmental effects on health and wellbeing are anticipated. SCC considers that this conclusion would benefit from further explanation.

5.48 The extension of the Order Limits brings construction activity closer to additional receptors, including residential park homes and communities not previously assessed, and therefore introduces new exposure pathways for potential health effects associated with noise, vibration, dust, traffic disruption, restricted/reduced access to social and green infrastructure (including healthcare) and stress. SCC is also concerned that the assessment does not appear to account for nearby sites referenced in current planning applications, which may represent future residential receptors during the construction period.

5.49 SCC recommends that the Applicant clearly sets out how health and wellbeing impacts for newly affected receptors have been assessed in light of the proposed revised Order Limits. This should include a clear explanation demonstrating if and why existing mitigation measures are considered sufficient and how the needs of vulnerable groups, such as residents of park homes, older people and those with existing health conditions have been taken into account.

5.50 SCC acknowledges the additional mitigation proposed in relation to the temporary closure of PRoW E-137/026/0, including signage, partial route retention and the provision of shuttle or taxi services for residents of Whitearch Park Residential Park Homes. The Applicant should clarify how frequent these services will be available and that users will not have to pay to use the services due to the disruption caused by the Applicant's works.

5.51 SCC reiterates that temporary loss or disruption of PRoWs, footways, bus stops and local access routes can have disproportionate health and wellbeing impacts, particularly for residents who rely on walking, wheeling or public transport for daily activities, physical activity and social connectivity. This is particularly relevant for residents of Whitearch Residential Park. These considerations are not captured by the Applicant's consideration of potential additional effects [CR1-053] in terms of the effects of these closures on the residents' physical and mental health and wellbeing. Nor has consideration been given to the impact of disruption on groups which may be particularly vulnerable to these impacts due to a higher reliance on the affected footway to access green and social infrastructure such as older residents

5.52 SCC therefore expects that disruptions are minimised as far as reasonably practicable and that mitigation measures are actively promoted and monitored to ensure they are accessible, reliable and effective for those most

affected. Particular consideration should be given to older residents and those with limited mobility.

### **Public Rights of Way (PRoW)**

5.53 As addressed in 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-053] paragraph 3.5.41 onwards, SCC broadly concurs with the assessment as long as adequate community engagement with regards to the temporary closures and diversions occurs in reasonable time prior to works and adequate signage is in place and SCC PRoW have prior notification of closures. Consideration should be given to the impacts on residents of Whitearch Residential Park arising from closures of the footway and PRoW as their pedestrian connectivity is likely to be the most affected by the closures. The alternative routes do not appear to cause a significant impact on most PRoW users.

## **6 Change 5 – Increase in Area for Maintenance of a New Hedge to South of B1119, Suffolk**

- 6.1 The applicant has proposed to widen a strip of land to the south of the B1119, near Fristonmoor Lane to allow more space to plant the proposed new hedge and the ditch. The proposal includes changing the type of access rights to this area to allow long term maintenance of the drain from the field.
- 6.2 The new hedge is part of landscape and visual mitigation to screen views of the converter station from the north/northeast and help reinstate historic hedgerow planting.
- 6.3 The Council's response to Change 4 is detailed by service area below.

### **Archaeology**

- 6.4 SCCAS have no objection to the planting of the proposed hedgerow at the converter station site, however, no ground disturbance should take place within areas defined as requiring archaeological mitigation as part of the proposed Lion Link scheme, during associated works, prior to the completion of mitigation work as part of the Sea Link project. The Applicant should collaborate and coordinate accordingly with the promotor for Lion Link for the relevant information.

- 6.5 Any areas where they're proposing

### **Highways**

- 6.6 Planting of the proposed hedge adjacent to the B1119 should not adversely impact forward visibility for traffic using this road.

### **Landscape**

- 6.7 The Council is unpersuaded that this change goes far enough and proposes that along the B1119, a sufficient corridor should be established to allow space for the hedge and a generous route corridor for a public right of way.
- 6.8 More detailed information is required regarding landscape, visual effects and vegetation loss before detailed comments can be provided.

#### **Public Rights of Way (PRoW)**

- 6.9 The Council is not persuaded that this change goes far enough and proposes that along the B1119, a sufficient corridor should be established to allow space for the hedge, watercourse, and a generous route corridor for a public right of way and maintenance access.
- 6.10 Paragraph 2.6.5 of the Change Request Report [CR1-052] refers to a strip of lands south of the hedge for maintenance purposes. SCC would welcome it, if this could be publicly accessible as a Public Right of Way.
- 6.11 However, details have not been provided on whether there is enough room in the Order Limits to accommodate this required width for a new Public Right of Way in this vicinity, nor widths provided on plans to accommodate a new PRoW or publicly accessible route, despite these being requested repeatedly in pre-application engagement. In the absence of this detail, the Council continues to recommend that more width is required or plans are produced to show an adequate width to accommodate for a new PRoW to enable pedestrians and cyclists to be able to travel alongside the B1119 off-road at this location, as SCC PRoW considers this to be essential mitigation.