

# SEA LINK

EN020026

## Post-Hearing Submission for Issue Specific Hearing 2

Suffolk County Council



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## Glossary of Acronyms

<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ExQ1</i>	<i>Examining Authority's First Written Questions</i>
<i>ESC</i>	<i>East Suffolk Council</i>
<i>EA1N</i>	<i>East Anglia One North</i>
<i>EA2</i>	<i>East Anglia Two</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ISH2</i>	<i>Issues Specific Hearing 2</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>LHA</i>	<i>Lead Highway Authority</i>

<i>LIR</i>	<i>Local Impact Report</i>
<i>NGET</i>	<i>National Grid Electricity Transmission</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OLEMP</i>	<i>Outline Landscape and Ecology Management Plan</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PEIR</i>	<i>Preliminary Environment Impact Report</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>RSPB</i>	<i>Royal Society for the Protection of Birds</i>
<i>SBIS</i>	<i>Suffolk Biodiversity Information Service</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SECHAONB</i>	<i>Suffolk and Essex Coast and Heaths Area of Outstanding Natural Beauty</i>
<i>SPA</i>	<i>Special Protection Area</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>

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

## **Purpose of this Submission**

The document has been prepared by Suffolk County Council to provide a written summary of the representations made by the Council at Issue Specific Hearing 2 (ISH2) held 28-30 January 2026. Examination Library references are used throughout to assist readers. Tables are numbered in line with the ISH2 agenda, items which were not relevant to Suffolk County Council have not been included in this submission.

## Written Summary of Representations made at Issue Specific Hearing 2 (ISH2)

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
1	<b>Welcome, introductions, arrangements for the Hearing</b>	
1.1	<p>Suffolk County Council were represented by the following team in person:</p> <ul style="list-style-type: none"> <li>• Michael Bedford – Kings Counsel</li> <li>• Zachary Farndon – Senior Planning Officer (NSIPs)</li> </ul> <p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none"> <li>• Graham Gunby – National Infrastructure Planning Manager</li> <li>• Roland Arbon – Project Manager (NSIPs)</li> <li>• Sam Bye – PRoW and Green Access Planning Manager</li> <li>• David Falk – Green Access manager</li> <li>• Seph Pochin – Ecologist</li> <li>• Isolde Cutting – Senior Landscape Officer</li> <li>• Jonathan Gear – Project Lead – Public Health and Communities</li> <li>• Natalie Freislich-Mills – Skills for Infrastructure Strategic Lead</li> <li>• Jason Skilton – Flood and Water Engineer</li> </ul>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
2	<b>Matters arising from the supplementary agenda</b>	
2.1	No comments to make on this matter.	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
3	<b>Ecology and Biodiversity</b>	
3.1	<p><b>Kent landfall</b></p> <p>SCC has no comments to make on this item.</p>	
3.2 3.2.1	<p><b>Suffolk landfall including: -</b></p> <p><u>Disturbance effects, emissions and mitigation</u></p> <p>SCC did not comment on this item during ISH 2. SCC offers the following comments in writing.</p> <p>Any works that have the potential to cause noise/visual disturbance should not be undertaken during winter months to avoid potential disturbance to bird species that are a qualifying feature of the nearby SPAs that may be using North Warren RSPB reserve. Noise fencing should be installed where appropriate to minimise noise emissions that could potentially disturb species on the nearby North Warren reserve.</p> <p>SCC would also like to add a comment on access S-BM13 which was discussed in the hearing. The current condition of S-BM13 is not suitable as a formal access for vehicles onto the beach and so must be included as a designated access. SCC would like clarity on what types of vehicles would use the access in the event of a frac out and whether the access would need to be in place before any potential frac out or post incident.</p> <p>In any case, if vehicles are accessing the beach, this needs to be assessed in terms of impacts on vegetated shingle. No HGV access onto the vegetated shingle should be permitted. Vegetated shingle is a sensitive priority habitat for both Suffolk and the UK. Should access to the beach front be required,</p>	

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	<p>an assessment of the impacts resulting from the beach access is required and appropriate mitigation measures drawn up. Reinstatement of any damage caused to this sensitive habitat should be carried out.</p> <p>If construction vehicles won't use S-BM13, para 6.2.2 of the CTMTP [CR1-041] must be amended accordingly.</p>	
3.2.2	<p><u>Unexploded Ordinance</u></p> <p>SCC has no comments to make on this particular item.</p>	
3.3	<p><b>Update on intrusive ground investigations</b></p> <p>SCC has no comments to make on this particular item.</p>	
3.4	<p><b>Effects on protected species such as bats, dormice, and reptiles</b></p> <p>Robust surveys for these species should be undertaken and the results of these surveys sent to Suffolk Biodiversity Information Service (SBIS). Appropriate mitigation measures/licencing requirements should be drawn up where these species are/have been recorded. Bat and dormouse presence/likely absence surveys are strongly recommended along the railway corridor either side of Benhall Bridge.</p>	
3.5	<p><b>Impacts on trees, including: -</b></p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
3.5.1	<p><u>Development Consent Order (DCO) controls on tree felling</u></p> <p>SCC did not comment on this item during ISH2.</p> <p>SCC would like to note that the potential for Article 51 to be used to fell veteran or ancient trees was discussed during the hearing. The Applicant stated that it is confident that its assessments will not require use of this article to fell such trees. However, the Applicant also stated that it may be necessary to use this article should ancient/veteran trees interfere with the proposed development or pose a safety hazard. SCC considers that any interference with or felling of ancient/veteran trees should be avoided as far as possible in line with what has been assessed, with this article used as a last resort only. As such, SCC considers that such a use of this article should require approval from the local planning authority to ensure loss of ancient/veteran trees is avoided as far as possible and only where necessary. SCC would appreciate clarity over whether this article can be used in relation to vegetation outside that which has been assessed to be removed in the ES and, if so, whether this would require approval under Schedule 3 of the DCO.</p>	
3.5.2	<p><u>Implications of the proposed attenuation ponds shown on sheet 1 of 7 of the Indicative General Arrangement Plans [CR1-024] to the south side of the access and the River Fromus bridge proposal, on trees T875S and G874S</u></p> <p>SCC concern on this matter was just to ensure that there was adequate consideration at the detailed stage when that pond is sited, to ensure connectivity in terms of wider habitat matters. However, regarding the impact on trees, the position is the same as ESC.</p>	

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3.5.3	<p><u>Seasonality in cutting of trees</u></p> <p>SCC did not comment on this matter orally but would like to note the following point. SCC would ideally like to see any required tree cutting to take place between the months of September and February, to avoid the risk of disturbing nesting birds, though it is appreciated that this is not always possible.</p>	
3.6	<p><b>Securing Biodiversity Net Gain (BNG)</b></p> <p>SCC echoed ESC concerns regarding how BNG uplift can be secured, the preference would be for this to be secured via legal agreement. Monitoring would need to be established in any obligation. However, this is proposed the local authorities would need to review draft agreement and be afforded the opportunity to comment before informing ExA of position.</p> <p>Greater clarification is required regarding the mechanism being proposed in relation to BNG, as there appears to be some confusion from SCC's reading of the BNG feasibility report ([REP1A-025], paragraph 5.2.1) it appears to commit to a 30-year period for the management of the BNG which is to be delivered, but SCC has read in other documents of different time periods for maintenance of things which may count towards BNG.</p> <p>SCC would like clarification that it is definitely the case that the commitment in 5.2.1 of the feasibility report is the intention for BNG. That is what SCC would expect to see in the draft Unilateral Undertaking or other agreement which comes forward. SCC considers that any provision of BNG should be maintained for a minimum period of 30 years as stated in para 5.4.44 of EN-1 with appropriate monitoring and reporting measures.</p>	

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4	<b>Ornithology</b>	
4.1 4.1.1	<p><b>Construction Impacts including: -</b></p> <p><u>Works affecting designated sites in the breeding season</u></p> <p>SCC did not comment on this item orally but would recommend a pre-works check for qualifying bird species should be made before works that could potentially cause disturbance to breeding/overwintering birds commences onsite. Appropriate mitigation strategies should be drawn up to avoid disturbing species such as Woodlark, Cetti's Warbler and Nightjar, which may potentially nest within the DCO boundary.</p>	
4.1.2	<p><u>Works in Pegwell Bay</u></p> <p>SCC has no comments to make on this item.</p>	
4.1.3	<p><u>Impacts and mitigation for functionally linked land</u></p> <p>SCC did not comment on this item orally but would like to note that works will have the potential to cause noise and visual disturbance to species using land outside the DCO boundary and outside the boundaries of the Special Protection Area (SPA). Mitigation strategies should be put in place where disturbance to species is likely.</p>	
4.1.4	<p><u>Impacts and mitigation for the effect of vessel movements on the Red Throated Diver of the Outer Thames Estuary and implication for habitats regulations assessment</u></p> <p>SCC has no comments to make on this item.</p>	

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4.2 4.2.1	<p><b>Operation and Maintenance Impacts including: -</b></p> <p><u>Impacts and mitigation for the effect of vessel movements on Red Throated Diver of the Outer Thames Estuary and implications for habitats regulations assessment</u></p> <p>SCC has no comments to make on this item.</p>	
4.3	<p><b>Collision Risk and Mitigation</b></p> <p>SCC Ecology has no comments to make on this item.</p>	
4.4	<p><b>Questions for the International Union for the Conservation of Nature regarding The East Atlantic Flyway</b></p> <p>SCC has no comments to make on this item.</p>	

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9	<b>Landscape and Visual</b>	
9.1	<p><b>Ambition for landscape vision and legacy</b></p> <p>As set out in its answers to the Examining Authority's First Written Questions (ExQ1) [REP3-101], SCC considers that the proposals for landscape and visual amenity mitigation and compensation fall short of the Applicant's vision of aiming to be responsive and respectful to the character of the local setting [APP-366] and of the recommendations of the Design Review Panel as presented in [REP1A-029] .</p> <p>The Applicant does not propose to secure the Overarching Design Principles in Table 2.1 and the Project Level Design Principles in Table 2.2 [APP-366] into the DCO. SCC further considers that even if they were, they would, in their current form, contain too many caveats and be overall too vague to be meaningful. SCC considers that a design code with clear commitments and design parameters should be developed and secured in the DCO. Alternatively, the wording of design principles should be unambiguous and secured in the DCO with a clear plan of activities for the design process, integrated into the delivery programme, set out.</p> <p>The combination of a site currently devoid of significant landscape features, and linear elements, could have led to a design that delivers landscape integration, landscape restoration and improved public access and connectivity towards the coast. It currently seems that, while delivering a viable energy</p>	<p>REP3-101</p> <p>REP1A-029</p> <p>APP-366</p> <p>REP3-069</p> <p>[CR1-045]</p>

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	<p>project, the opportunities for a positive legacy in terms of the hosting landscape and the access to it are being missed and not pursued by the Applicant.</p> <p><i>Fromus Crossing</i></p> <p>The Applicant pursues a permanent crossing through the highly sensitive historic landscape of the Fromus Valley resulting in significant adverse landscape and visual effects, without securing any benefits for the host community of Saxmundham. connect to the PRoW east of the Fromus are no longer considered necessary by the Applicant.</p> <p><i>Converter Station site</i></p> <p>SCC considers that in the pursuit of minimising the land take for the scheme, the Applicant has not retained sufficient land to provide mitigation planting commensurate with the scale of the project and magnitude of change to views and landscape character east of Saxmundham. This has also been pointed out by the Design Review Panel.</p> <p>SCC has commented previously on the proposed tree belts around the converter station site in response to ExQ1 [REP3-101]. The cross-sections in relation to the proposed planting along the B1119 provided by the Applicant in their response to ExQ1 [p. 55-56, REP3-069] demonstrate that the proposals as they currently stand are inadequate and (suggesting only 2m width for the hedgerow corridor) do not allow for the hedge and trees to mature into a landscape feature that would be able to contribute to the integration of the converter station into the landscape. SCC considers that a planting strip of at least 10m width should be provided along the B1119 and that to the south of that strip a right of way should be provided, coinciding with the southern maintenance strip.</p> <p><i>Friston Substation</i></p>	

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	<p>Scenario 1: SCC considers that Sea Link needs to be mindful to accommodate the emerging finalised mitigative planting proposals by SPR and queries whether there can be a mechanism that would allow laying the cables at a depth which would allow tree/woodland planting above using an open trench method and implementing this element of the mitigation after this work has been carried out.</p> <p>Scenario 2: SCC considers that the mitigation planting to the north of Friston substation, as presented in Figure 5 of the Outline Landscape and Ecology Management Plan (OLEMP) [CR1-045] would not provide sufficient screening for visual receptors.</p> <p>Further comments are included in SCC's Comments on submissions received by Deadline 3.</p>	
9.2	<p><b>Assessment of effects on landscape character in Kent and Suffolk</b></p> <p>As set out in previous submissions – LIR [REP1-130]</p>	[REP1-130]
9.3	<p><b>Cumulative landscape and visual impact assessments including on the National Landscape</b></p> <p>SCC stands by its previous submissions on the inadequacy of the Applicant's assessment of effects on the NL as made in response to ExQ1 [REP3-101], LIR [REP1-130] and response to Deadline 1 submissions [REP2-062]. SCC has also commented on Appendix A of [REP3-070] at Deadline 4.</p> <p>In addition, it is unclear to SCC why no magnitude of effect is given for cumulative effects.</p>	[REP3-101] REP1-130 REP2-062
9.4	<p><b>Assessment of effects on Heritage Coast</b></p> <p>While SCC accepts in principle the Applicant's approach of only assessing effects on the Suffolk Heritage Coast, where they would be different from those on the Suffolk and Essex Coast and Heaths</p>	

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	<p>Area of Outstanding Natural Beauty (SECHAONB), i.e. in near-shore waters, the relevant Coastal Character Area, Thorpeness to Aldeburgh Coast (Touching the Tide Landscape Character Assessment (TTLCA) (Touching the Tide Partnership, 2012), could have been identified and its characteristics referenced within the wider assessment. Further comments are provided in SCC's Comments on submissions received by Deadline 3.</p>	
<p>9.5 9.5.1</p>	<p><b>Landscape mitigation in Kent and Suffolk including: -</b></p> <p><u>The securing of advance planting</u></p> <p>SCC considers that the response provided by the Applicant to EXQ1 1LVIA5 [REP3-069] does not provide any further reassurance regarding the securement of advance planting. The commitment remains caveated.</p> <p>Firstly, with regards to where such advance planting may happen (where it does not conflict with construction activities and compounds). SCC considers that these areas and the phasing for their implementation should be more clearly defined within the outline LEMP and CEMP. The wording <i>'advanced planting will be undertaken in the first available planting season prior to construction'</i> is confusing and not very helpful. SCC would ask the Applicant to determine, when, in the sequence of events, advanced planting should occur. SCC suggests that this could be during pre-commencement works, after necessary site clearance and invasive surveys and prior to implementation of tree and hedgerow protection. SCC anticipates that the window between the Discharge of Relevant Requirements and works being carried out on site is likely to be marginal, and there may not be a planting season in between. This should be considered in the wording to avoid undue delays to the project.</p>	<p>REP3-069</p>

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9.5.2	<p>Secondly, advance planting would be subject to discussions with the contractor. SCC considers that only, if it can be demonstrated by the contractor that advance planting in a particular area would result in an undue burden, should a postponement be considered.</p> <p><u>Adaptive Aftercare</u></p> <p>SCC considers the currently proposed prescriptions for aftercare as presented in Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Version 2, change request) (Clean) [CR1-045] insufficient, as potential measures set out in Section 7.3 do not reference the possibility of an extension of time to the aftercare period of 5 years (which SCC do not consider long enough for the establishment of trees and woodlands), should this be required to achieve successful establishment equivalent to five years' growth.</p> <p>LV03/LV04 of the REAC [REP3-078] solely refer to a five-year aftercare period, except for those areas that will be maintained for the lifetime of the asset (all planting associated with the Fromus Bridge, permanent access track, Friston substation (under Scenario 2) and Saxmundham converter station). Temporal adaptation of the aftercare regime is not envisaged.</p> <p>SCC considers that this needs to be amended in both the oLEMP and the REAC.</p>	
9.5.2	<p><u>Landscape mitigation for Kiln Lane substation</u></p> <p><u>SCC planning:</u></p>	

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	<p>Sea Link's proposals should ensure no worse mitigation than that consented for the SPR projects under Scenario 2. Plans should be produced to align the Applicant's approach with SPR's now that SPR's detailed plan has been submitted to discharge the requirement (application ref: DC/25/4826/DRR).<sup>1</sup></p> <p>Under scenario 1, the Applicant must ensure SPR's mitigation is not undermined by Sea Link's cabling works. SCC follows ESC's request for HDD to be undertaken here. Sea Link's approach risks undermining the decision by the SoS to consent the EA1N and EA2 DCOs. Now that SPR has submitted an application to discharge Requirement 14 (1) (Landscape Management Plan), the Applicant ought to produce plans for a coordinated approach to these.</p>	
9.5.3	<p><u>Potential for additional landscape planting in the vicinity of the proposed converter station at Saxmundham within the order limits – with reference to Figure 1 of the Suffolk outline landscape and ecological management plan [CR1-045] and representative viewpoints</u></p> <p>Given the landform of the landscape and openness of the site, as well as the nature and scale of the proposed project, SCC considers that a multi-layered approach to mitigation planting is required to achieve minimisation of visual effects from as many locations surrounding the site as possible (not just from the worst affected representative viewpoints). Through re-instatement of boundary hedgerows in the wider landscape and the use of strategically placed woodland blocks/tree groups, as well as</p>	REP2-062

<sup>1</sup> <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?keyVal=T75IRYQX07400&activeTab=summary>

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	<p>scattered trees, in varying distances from the visual receptors, would make mitigative planting more effective in screening the development (viewing angle) and/or provide a different focus in the middle ground.</p> <p>SCC considers that there is scope within the order limits for additional landscape planting, but that the order limits as currently proposed are drawn in such a way that they preclude sufficient mitigation planting in the wider landscape. In some areas Compulsory Acquisition (CA) of additional land may be required to enable visual mitigation for the worst affected areas, for example from the south, as demonstrated by VP4 [APP209]. Alternatively, it may be possible to secure the land required through a long-term lease or other landowner agreement.</p> <p>In reference to Figure 1 of the Suffolk outline landscape and ecological management plan [CR1-045] and Figure 2 under 6.8.9.5 of ESC's LIR [REP1-128], SCC agrees that woodland planting in Area A may not be appropriate within the historic landscape pattern, but considers that every effort must be made to strengthen the planting between Bloomfield Covert and Wood Farm. This would help to reduce visual effects on VP2 [App-209] and VP20 [APP213].</p> <p>With regards to Area B, there could be planting along the PRoW leading south from the B1119, which would not completely block views to the wider landscape, such as a line of trees or intermittent shrub planting. In addition, strategic block planting could be used to the north of the converter station (for example, to the north-east of where the three PROW meet in their proposed location). Such intermittent planting would improve screening/filtering of views from VP1 [APP-208] (and other parts of the PRoW). The current proposals are not expected to be able to fully screen the converter station, even long-term,</p>	

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	<p>given the height of the proposed buildings and the location of the proposed mitigation planting, close to the proposed structures.</p> <p>Area C is fully supported by SCC and considered essential, especially in the northern section. Cross sections of works along B1119 show that only 2m width is allowed for the hedgerow. This is considered entirely insufficient to develop into a landscape feature capable of mitigating the views of the converter station from the north (see VP16, [APP-211]). The minimum width for a hedge corridor should be 5m. However, in this location SCC agrees with ESC that a tree belt (of no less than 10m width) is necessary, as not even a substantial hedgerow would be able to effectively screen or filter the extent of views towards the converter station. South of this planting, sufficient distance would need to be allowed (no less than 2 m) to a maintenance track that would also allow for public access.</p> <p>This would likely require use of land currently excluded from the Order Limits along the southern side of the B1119. SCC notes the advice given by the DRP as shown in Design Approach document [REP1A-029] which recommended that the Applicant removed too much land from the Order Limits to achieve sufficient essential mitigation planting.</p> <p>Further comments on specific representative viewpoints:</p> <p>VP1 [APP-208]: SCC agrees with the Applicant's assessment of visual effects and considers that there are significant visual effects and changes to the landscape in the area, which would be long term, if not permanent.</p>	

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	<p>Considering the openness of the landscape, SCC notes that it is a denuded landscape, and this is not necessarily a characteristic that needs to be aimed for or maintained.</p> <p>SCC is of the view that the proposed mitigation planting is not sufficient in this area and that additional planting as outlined above is required and deliverable (albeit not entirely within the current DCO boundary), especially when considering the site is in an area which has been denuded in the latter half of the 20th century and is now devoid of most landscape features.</p> <p>As a result, SCC sees an opportunity for improvements to the landscape character in this area to form part of the legacy of this project, but so far this has not materialised.</p> <p>The indication by the Applicant that revised proposals for this area will be submitted at Deadline 4 is welcome, and SCC will comment on these in due course.</p> <p>VP4 [APP-209] and VP5 [APP-209]: SCC agrees with the Applicant's assessment of visual effects and considers that wider landscape restoration and a layered approach to mitigation planting, including some foreground planting (field boundary hedge) is required in this area. Additional land may need to be secured for the long-term in this area, by CA or landowner agreement. SCC would welcome further information in this matter, equivalent to information regarding the area north of the converter station.</p> <p>VP21 [APP-213]: SCC considers that this viewpoint underlines that a single feature approach to mitigative planting is insufficient. Even with a tree belt along the B1119 there would likely be long-term major adverse visual effects. If a hedgerow along the PRoW could be secured, this would increase the chances of providing a filter/screen towards the converter station site within the medium term (5-10 years).</p>	

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9.5.4	<p><u>Implications of the statutory consultation documents for LionLink. With reference to figure 49 of the Converter Station - Background to Potential Design Approaches</u></p> <p>SCC considers Lion Link's proposed landscape mitigation for the converter station, such as figure 49, to be more aligned with SCC's views on necessary mitigation than Sea Link's proposals.</p> <p>SCC considers that the Applicant should have regard to Lion Link's proposals, in particular at the interface of the two proposed converter stations at Saxmundham and the Kiln Lane substations to enable seamless PRoW and planting connections and a coherent landscape setting</p> <p>Figure 49 appears to show a more comprehensive approach to landscape mitigation in terms of greater areas of planting. This includes not only more planting in the immediate vicinity of the proposed Lion Link converter station, but also to the west of the site by Fristonmoor Lane. There also appears to be provision for amenity benefits including a community orchard and community allotments. This would not be proposed by that applicant unless it had good reason to consider such measures as essential mitigation/offsetting. SCC considers that the Applicant should consider how it could take a similar approach of including amenity benefits which could be achieved through similar measures or others as have been suggested by SCC.</p> <p>SCC considers that there is a need for greater coordination between the projects in terms of their approach to the converter station site. Certain aspects of Lion Link's proposal including the aforementioned orchard and allotments appear to overlap with parts of the Applicant's proposal along the B1119 such as the maintenance road. Advanced planning for the scenario where Lion Link is also consented is crucial to ensure the two projects are complimentary by avoiding duplication and discordance. This also applies to other enhancements proposed by Lion Link such as additional stretches of PRoW including from the B1121 along the haul road. Therefore, the Applicant should</p>	

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	<p>ensure outline details are secured in the DCO both for the scenario where only Sea Link or both schemes are brought forward. Whilst it is likely that less detail can be provided for the latter scenario at this stage, stronger coordination commitments could be made to provide the SoS with greater certainty over the final outcome of the site. This could take the form of a commitment to some kind of joint plan once Lion Link is consented as suggested by Advice Note 17.</p>	
9.5.5	<p><u>Landscape mitigation for Minster converter station and substation</u></p> <p>SCC has no comments to make on this item.</p>	
9.5.6	<p><u>Adequacy of National Landscape mitigation</u></p> <p>SCC stands by its previous submissions on the inadequacy of the Applicant's proposal to meet the section 85 (A1) CROWA 2000 duty as made in response to 1LVIA7 of ExQ1 [REP3-101], LIR [REP1-130] and response to Deadline 1 and 1A submissions [REP2-062].</p> <p>SCC also notes that locating the temporary construction compound outside the NL would contribute to avoiding/reducing adverse effects. It is not clear to SCC that it has been demonstrated that it is necessary to be located there.</p> <p>In ISH2, SCC noted that further information regarding the National Landscape had been submitted at Deadline 3. SCC has now reviewed and responded to the relevant submissions in its Comments on Deadline 3 Submissions.</p>	<p>REP1-130</p> <p>[REP2-062]</p> <p>[REP3-101]</p>

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
10	<b>Design</b>	
10.1	<p><b>Adequacy of design controls including in relation to converter stations, substations, pylons, lighting</b></p> <p>SCC would want to see coordination on the design up front, not only on the built elements, but also as far as the landscape treatment is concerned for the project locations, particularly in the vicinity of the Saxmundham converter station. Currently SCC do not see this as unachievable, and it is capable of being expressed through design principles.</p> <p>SCC do not currently think that the documentation is sufficient in this regard, and on the wording of the DCO SCC do not believe that it has been properly secured.</p> <p>SCC believes regarding landscape works that the design principles do not currently work particularly well in Saxmundham or Friston and the design principles for Friston substation are insufficient and do not cover landscape very well.</p> <p>Regarding plans seen for scenario two, the planting seems inferior to that consented by SPR. Going forward it would be important that when there are clauses like a substantially in accordance with outline plans, for example, the location of new PRow and other planting elements, is not prohibited because something else has approved in that area.</p> <p>SCC is concerned that the Applicant's approach to design is disregarding the experience of discharging authorities particularly in Suffolk with regards to dealing with energy Infrastructure, so the suggestion</p>	<p>REP3-101</p> <p>[APP-366]</p>

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	<p>that local authorities would want to interfere with something which in engineering terms is not practical is not going to happen as they understand how energy infrastructure works. Even if this was a concern, it is capable of being addressed through the design principles work. There is already a suggestion in the design principles that that there are critical design constraints, and therefore is not beyond the ability of drafting to ensure that any withholding of consent for the discharge of the requirement cannot transgress a critical design consent.</p> <p>For example, if a building needs to be six metres high, it would not be a good ground of objection that that it is six metres high, so that can be dealt with. There is a response to ExA question 1GEN47 where the Applicant made the point which draws attention to Bramford to Twinstead where there were no controls in that DCO and therefore it sets a precedent.</p> <p>SCC believes there is a considerable difference between Sea Link and Bramford to Twinstead as at Bramford additional infrastructure is being added, whereas at Saxmundham, where so far as the converter station is concerned is a large greenfield site without any energy infrastructure.</p> <p>Therefore, SCC believes the Bramford to Twinstead example is not really an appropriate precedent for the circumstances here.</p> <p>SCC believes, in agreement with Thanet DC, that if the requirement required approval, the in “general” accordence provision should certainly be removed, because that is a massive loophole in the degree of any control.</p> <p>SCC highlighted the importance of bringing in the substation and Fromus Crossing into these controls and the design principles, as currently as they are worded, they fall a long way short of equivalent principles in the approved documents for EA1N and EA2. Therefore, SCC believes there is a need for much tighter controls.</p>	

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	<p>SCC notes that requiring details of the layout, scale and design of utilitarian infrastructure, such as substations to be approved by the relevant planning authority is not a consistently applied requirement in energy DCOs, whilst recognising that this is required by EA1N and EA2 DCOs. However, SCC considers that the context of the sites for the Fromus crossing, Kiln Lane substation and converter station, notably the (at present) rural setting and residual significant effects, entails that a robust approval process for their designs is required as was recognised by the SoS for the Kiln Lane substation under the EA1N and EA2 DCOs.</p> <p>SCC agreed to work with ESC, Thanet DC, and Kent CC in suggesting wording to Requirement 3 which might make it more workable.</p> <p>Lighting:</p> <p>Construction lighting should be minimised, not used when not needed and directed away from sensitive receptors, i.e. wildlife as well as residential properties; operational lighting needs to be minimised, use lowest lux and Kelvin levels, and needs to be agreed with relevant planning authority.</p>	

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10.2	<p><b>Embedding of good design in decision making process</b></p> <p>SCC considers that secured design principles should include principles for landscape design and mitigative planting for the entire project area, and in greater detail for the Fromus Crossing, The Saxmundham Converter Station site, and Friston/Kiln Lane Substation.</p> <p>The landscape proposals offered by Sea Link as a standalone project must be considered inferior to the landscape proposals submitted by SPR for Friston/Kiln Lane substation and presented by Lion Link for Saxmundham Converter Station in their Statutory Consultation.</p> <p>Project Level Design principle PE.2 [APP-366]; while feedback established that green/blue roofs would be the preferred option with regards to the six presented design approach options, PE.2 remains vague as to whether this is deliverable. It has to be asked, why options have been presented, if there are serious doubts regarding their deliverability. SCC has commented further on the Overarching and Project Level design principles in chapter 5 of [REP1-130].</p> <p>SCC considers that it would be helpful, if design and layout/spatial arrangement of the converter station at Saxmundham could be further developed, so that more realistic visualisations could be prepared. This may not only reassure the interested parties by demonstrating that adverse visual effects would be reduced from those shown when assuming the worst-case scenario (this could apply to VP2 [APP-209]) but also help the Applicant to demonstrate the effectiveness of their embedded mitigation.</p>	

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11	<b>Cultural Heritage</b>	
11.1	<p><b>Suffolk bronze age enclosure update</b></p> <p>SCC offers the following written comments on this item:</p> <p>Additional archaeological survey work (geophysical survey and trial trenched evaluation) has been completed, with SCC Archaeological Service (SCCAS) approval, to investigate the site at Friston, which was originally thought to be a Neolithic Hengiform monument of national significance.</p> <p>SCCAS are now satisfied that based upon the form and finds evidence from the additional evaluation, that this site is in fact a later Bronze Age D-shaped enclosure.</p> <p>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 therefore mitigation through excavation would now be acceptable.</p> <p>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 it is not going to be completely avoided by the scheme. SCCAS are satisfied that the expansion of the Order Limits around this monument as proposed in the Changes Consultation is sufficient to facilitate full excavation of the enclosure and any associated internal and external remains.</p>	

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	<p>If the Applicant decides that they wish to avoid this monument entirely and not undertake any works involving ground disturbance within or immediately adjacent to the enclosure, this will remove the need for excavation. SCCAS would strongly support this approach given the opportunity available to achieve preservation in situ for this site and as this would represent the optimum management of this heritage asset. The results of the additional archaeological survey work have shown that although some further 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 available which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance.</p> <p>Provision for suitable archaeological mitigation within this part of the scheme, including the additional area added as part of the Changes Consultation, should be included in the revised OWSI, which the Applicant has advised will be submitted in due course.</p>	
11.2	<p><b>Remaining archaeological on-site assessment work and reporting</b></p> <p>SCC offers the following written comments on this item:</p> <p>SCCAS are satisfied that the large majority of the red line boundary has been subject to sufficient archaeological assessment, through desk-based assessment, non-intrusive works such as geophysical survey and intrusive techniques such as trial trenched evaluation.</p> <p>The areas of the scheme where evaluation remains outstanding are fairly limited but include new areas which have been added to the scheme as part of the Changes Consultation (e.g. Benhall bridge), and small areas along the cable corridor where constraints, such as trees or ecological buffer zones, are present that prevent evaluation works at this stage.</p>	

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	<p>As these are relatively small areas which are not currently known to contain, or are immediately adjacent to, designated heritage assets or recorded undesignated heritage assets of high sensitivity, SCCAS do not object to this work being undertaken post- consent and secured through suitably worded Requirements and the updated OWSI (which the Applicant has advised will be submitted in due course), although it should be completed at the earliest opportunity in order to allow mitigation requirements to be established in a timely manner. The OWSI must also make provision for appropriate mitigation for all archaeological remains of significance defined within the order limits during archaeological evaluation, prior to the commencement of any pre-commencement or construction works involving ground disturbance.</p> <p>Geophysical survey reports (for both the original scheme area in Suffolk and the additional expansion of the route at Friston) have been submitted and SCCAS are happy to approve these documents.</p> <p>The Phase 1, 2a and 2b trial trenched evaluation reports for Suffolk have been submitted and SCCAS are happy to approve these documents. The Phase 3 trial trenching report for the additional trial trenched evaluation work undertaken at Friston is pending, however, SCCAS monitored the results of this work in person in the field are satisfied with the work which has been undertaken.</p> <p>The Aerial Photography and LiDAR report (APP-113) is currently in draft form and SCCAS have requested some minor amendments to enable its approval.</p> <p>SCCAS have not yet been provided with a copy of the GI archaeological monitoring report for the scheme and would request that a copy is submitted for review.</p>	APP-113
11.3	<p><b>Scoped out heritage assets</b></p> <p>SCC defer to Historic England and ESC on this matter</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
11.4	<b>Effects on setting of Listed Buildings, including Hurts Hall and Hill Farmhouse</b> SCC defer to Historic England and ESC on this matter	
11.5	<b>Ebbsfleet Peninsular Multi-Period Complex archaeology impacts</b> SCC has no comments to make on this item.	
11.6	<b>Richborough Roman Fort Impacts</b> SCC has no comments to make on this item.	

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12	<b>Public Rights of Way (PRoW)</b>	
12.1	<p><b>Public rights of way impacts and proposed mitigation and coordination</b></p> <p>SCC did not make oral submissions under this agenda item. However, SCC has made relevant comments on this matter in response to the Applicant's answer to 1TT17 of ExQ1. In short, SCC considers the Applicant's commitments to coordination to be an unreliable mitigation measure for potentially significant cumulative effects if relied on as the only measure to mitigate such effects. SCC has also detailed other necessary mitigation measures, such as in Chapter 11 of [REP1-130] and Table B4 of [REP2-062], which should be implemented.</p>	<p>REP2-062</p> <p>REP3-069</p> <p>REP1-130</p> <p>REP2-062</p>
12.2	<p><b>Possible enhancements to the rights of way network</b></p> <p>SCC noted that the discussion regarding the space allowed for PRoW and maintenance along the B1119, being supplied within the Order Limits came up in the CAH1 earlier in the week, regarding the</p>	<p>REP2-062</p>

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	<p>Applicant's approach to whether or not it is proposing to acquire land rights to enable it to deliver such matters.</p> <p>SCC have concerns regarding the Applicant's approach to which suggests that if impacts are considered not significant then there is no obligation or requirement on them to address those effects, although there have been instances where the Applicant, as a matter of discretionary choice has put forward measures even when they are addressing effects which have been identified as non-significant.</p> <p>SCC does not see the obligations on the Applicant to be that limited because the Council do not see it as a matter of policy or as a matter of the legal tests, In s104 of the 2008 Planning Act, the remit of the Examination and the remit of the decision making process should be confined to – considering only the adverse effects or impacts, which are significant in EIA terms, and SCC considers that there can be non-significant adverse effects which still need to be addresses, whether by mitigation or by offsetting or another form of compensation.</p> <p>SCC considers that when you look at the PRoW impacts in the vicinity of Leiston and the B1119, the residual adverse impacts are such that some form of enhancements to PRoW in the locality do need to be delivered.</p> <p>SCC considers that the enhancement is necessary to make the development acceptable in planning terms and therefore provides an adequate justification for the compulsory acquisition and therefore would be for the Applicant how it will secure land rights to deliver such a measure.</p> <p>SCC is seeking enhancement in other areas including Sluice Cottage, Thorpe Road, between Aldeburgh and Thorpeness. There is an existing PRoW in this location, but the Council is seeking, in way of enhancement, an upgrading of that route, as opposed to creating a new route.</p>	REP3-069

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	<p>There is potential for significant intra project cumulative effects on PRow in construction and decommissioning, including a bridleway which has impacts on the user experience and local travel patterns, however no mitigation measures were proposed at that stage considering the mitigation hierarchy. SCC questions whether the Applicant has investigated potential compensation enhancement measures to the PRow network subject to potential significant adverse effects.</p> <p>SCC does not accept the principle that just because there is a temporal distinction between where there is an impact and when there could be a means of addressing it, nor does the Council accept that there may be a geographic difference that necessarily removes the enhancements.</p> <p>SCC believes there is a legitimate case for offsetting the residual adverse effects on the PRow network both to those which are identified as being significant effects but also those which are considered a lower level than significant. This is a discussion SCC wishes to have with the Applicant to find ways in which those matters can be offset and therefore include enhancements to other parts of the network.</p> <p>Key enhancement proposals from SCC's submissions include:</p> <p>PRow along B1119: There appears to be a maintenance track on the south side of the B1119 as shown in the cross section in the appendices to the Applicant's response to ExQ1. It is not clear why this could not also function as a PRow when not in use by the Applicant's vehicles both during the operational phase and in the future. It is not uncommon for PRow to co-exist with other activities (such as along a farm track also subject to occasional use by agricultural vehicles/machinery).</p> <p>If Fromus bridge is permanent, a PRow along there from the B1121 to link East Saxmundham to the Saxmundham Garden Neighbourhood and to link to the existing PRow network.</p>	

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	<p>Other suggestions can be found in SCC’s previous submissions especially LIR [REP1-130] – see paras 11.231 to 11.249. These include:</p> <p>“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.” (11.247) (11.248) “The Council considers that the surfacing of E-103/006/0 from Sluice cottage at the beach to the old railway line should be considered for mitigation”</p> <p>SCC has given a detailed response to the Applicant’s answer to 1TT16 of ExQ1 which gives more detail on SCC’s position in relation to matters discussed under this agenda item.</p>	
13	<b>Traffic and Transport</b>	
13.1	<p><b>Benhall bridge proposed works, with potential diversions and rail line effects</b></p> <p>During the hearing, SCC expanded upon several points made in its representation on Change Request 1 [REP3A-031]. A summary of oral submissions are given here along with further written comments.</p> <p>A meeting was held with Sealink on the 22<sup>nd</sup> Jan 2026 during which the two options were discussed in outline. In December 2025 SCC received an Approval in Principle relating to investigations required for option 2. SCC are in the process of commissioning one of our consultants to review and comment on this document. Once this comes back then the plan is to move forward with the inspection. SCC happy</p>	REP3A-031

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	<p>to assist and work collaboratively with the Applicant and Network Rail on this matter. However, it should be noted that, by their nature, there is always a risk that further investigation or works reveal additional defects that can lead to a reduction in the structural capacity.</p> <p>SCC finds it difficult to comment on the feasibility of option 1 (temporary bridge) until sufficient detail such as constriction drawings and traffic management are provided. SCCs preference, if an alternative northern route to the Saxmundham Converter Station has been properly assessed and discounted (as to which see SCC’s separate response to CAH Action Point 2), is for option 2, permanent repairs as this would support other energy projects and be a long term solution that could include the operational and decommissioning phase of Sea Link and Lion Link.</p> <p>Regarding timescales of potential repairs, SCC cannot commit to repairs being done within a 28-day period until SCC has seen the details of the investigation. SCC notes that the Applicants concerns are particularly around water proofing and water ingress. SCC is aware that the initial report highlighted potential corrosion of the deck beams, which is an important issue to come out of the investigation and could lengthen the closure time for Option 2.</p> <p>The requested details should be supplied either now (for option 1) or prior to end of examination. If works for Option 2 not yet known by end of the examination, the maximum envelope of works for which consent is being sought should be provided. These details would ensure the decision maker and ExA knows the works are feasible within the highway boundary, as sought by the Applicant, which is essential as they are necessary enabling works to make the project deliverable. Moreover, these details are essential for SCC as the LHA to give meaningful representation during the examination as SCC would be required to</p>	<p>REP3A-031</p>

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	<p>give consent to these works at a later date. This point also applies to allow other IPs in Suffolk to have an acceptable level of information when making representations during the examination.</p> <p>SCC mentioned its concerns regarding the traffic data given for the assessment of traffic redistribution during closures of the Benhall Bridge. SCC expands on this comment here. SCC does not see how assessment of closures of the Benhall Bridge is robust. Receptors along the diversion route are shown as incurring lower levels of traffic and SCC does not see how this could accurately capture a reasonable worst-case scenario. It is unclear how the Applicant has derived the traffic numbers of redistributed traffic for that assessment including whether redistributed traffic of road users not associated with the proposed project are included which is necessary for the assessment to be robust.</p> <p>During the hearing, SCC noted that it appears that what has been assessed is only closure of Benhall Railway Bridge. SCC notes that the applicant is proposing that the temporary bridge is to be stored at the Fromus Bridge compound. It is unclear if deployment of this bridge will require closure of the B1121 from the A12 to the new access to the Fromus Bridge and if so whether this is reflected in the assessment in CR1-068. If so, then the B1121 would need to be closed either side of the T- junction in Benhall. SCC requests that this is reflected in the modelling that has been provided for review.</p> <p><u>AILs</u></p> <p>SCC also questioned the number of AIL movements requiring closure of the bridge under Option 1. Currently, the Applicant's suggests there would be 15 movements; however, SCC's experience from other NSIPs suggests a lot of smaller AIL movements may also need to use that route, including cranes and haulage of earth moving equipment which is necessary to get to the west side of the proposed bridge. These movements exceed the weight limits for the bridge. At a 46 tonnes restriction, this would</p>	

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	<p>include many haulage for plant or machinery, piling rigs and cranes. Therefore, SCC requires assurance that it will be 15 movements.</p> <p>The Applicant also needs to consider Special Order Movements moving with Police escort along the A12. These would likely need to be moved singly due to the lack of availability of suitable trailers in the country. SCC would also need reassurance from Suffolk Police that they are happy to move multiple Special-Order Movements.</p> <p><u>Diversion route</u></p> <p>SCC stated its concerns with the proposed diversion route during closures of the Benhall bridge which are covered in what follows along with additional written comments.</p> <p>Of particular concern for is the A12/B1119 junction for safety and the Saxmundham crossroads which is already experiencing congestion problems. In meetings the applicant has given verbal assurances that temporary closure of Benhall Bridge or repairs to it will be at times that its construction traffic is low, but this has yet to be secured in writing. Nor is this understood to be included in any assessment of impact along the diversion route, noting that Appendix M [CR1-068] Additional Assessment of Proposed Temporary Road Closure only considers road links not junctions.</p> <p>SCC also relayed concerns regarding the proposed diversion route which goes through the centre of Saxmundham via the traffic signalised junction. As stated in SCC's LIR [REP1-130], based on previous junction assessment, this junction is already over capacity in the peak and shoulder hours. SCC also has concerns that that the junction is close to capacity during the off-peak hours between the two</p>	

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	<p>afternoon peaks, so pushing all of the traffic from the B1121 in this direction is a concern given the diversion route.</p> <p>Additionally, the diversion route for closure of the Benhall Rail Bridge proposed in [CR1-011] does not assess the links between junctions in [CR1-067] and [CR1-068]. This diversion has not been agreed with SCC as it is usual to use like for like diversions so for a closure of the B1121 substitution the route would follow the B1119. Either route has issues, the former crossing a level crossing and a steep hill start at a junction and the latter bends, narrow streets, on street parking and a low bridge on the B1121.</p> <p>If the developer is to follow through on the proposal to prohibit or at worst restrict construction vehicle movements when the B1121 is closed SCC would expect this to be included as a commitment to avoid confusion or misunderstanding during the construction phase.</p>	
13.2	<p><b>Construction traffic and abnormal indivisible loads – suitability of routes proposed</b></p> <p>As stated during CAH1 and in response to action point 2 of CAH1, the alternative of Sizewell link road should be further explored, noting that impacts on the B1119 should be minimised and mitigated to reduce risk of disturbance to the SZB emergency access route.</p> <p>In [REP3-069] 1TT5 SCC notes that multiple concurrent AIL deliveries are considered an option. Whilst there is experience of this for SZC, notably piles for the aggregate jetty the practicality of this for the special-order movements should be checked with hauliers and the police.</p> <p>Weight restrictions for AILs have been placed on several structures on the A12 between the A14 and Lowestoft. SZC have undertaken a review of most structures and assessed these for their anticipated AIL movements up to and including STGO movements albeit some structures to the north of Yoxford</p>	REP2-062

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	<p>remain to be completed and the assessments have resulted in restrictions being place on some structures.</p> <p>Structures on the A1094 and B1069 are not within the SZC scope and have not been reviewed or assessed by any NSIP.</p> <p>Whilst generally the geometry of the A12 between the A14 and Lowestoft is suitable for HGV movements increase volumes of movements related to NSIPs are causing concerns to SCC in terms of capacity, structural conditions and general highway maintenance.</p> <p>Other routes particularly B roads are less suitable for significant numbers of HGVs as described in our LIR</p> <p>The detail included in this application can be contrasted with that for Norwich to Tilbury which includes full routes for AILs as shown in:</p> <p><a href="https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000188-7.3%20Outline%20Construction%20Traffic%20Management%20Plan%20Appendix%20A%20-%20AIL%20Access%20Strategy.pdf">https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000188-7.3%20Outline%20Construction%20Traffic%20Management%20Plan%20Appendix%20A%20-%20AIL%20Access%20Strategy.pdf</a></p> <p>SCC has relayed its issues on construction traffic routes in its LIR {REP1-130} such as in paragraph 11.125</p>	
13.3	<b>Junction modelling and traffic flows on construction routes</b>	

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	<p>SCC met with the Applicant on 22/01/25 concerning matters which included junction modelling. SCC considers further modelling is needed on junctions such as the A12/B1119 which is a particular safety concern. SCC agreed with the Applicant to discuss the matter further in a future meeting.</p> <p>SCC expressed concerns regarding the cumulative impacts of NSIPs on a particular route on the A12 where HGVs congregate which is also the main through route for workers. Also, A1094 specifically with the interaction with SPR and Sizewell C traffic but also Sea Link traffic and the future LionLink traffic and the B1121 in relation to Sea Link and the following LionLink. SCC also provided a summary of traffic modelling information that was available to SCC.</p> <p>SCC provided a summary of junctions that it considers warrants further assessment in Appendix A of its response to the ExAs first round of questions [REP3-101]. Of particular concern is the cumulative impact of NSIPs including Sea Link on the local highway network. Recognising that there are a number of interventions at junctions being undertaken by other NSIPs, these have been screened out. The layout of the document is intended to highlight junctions of specific concern together with a rationale. As noted below, more traffic data and programmes are becoming available which the authority considers warrant inclusion in the assessment of cumulative transport impacts.<sup>2</sup></p> <p>SCC believes, regarding junction modelling, the Applicant's previous input data that it's relied on for the other project have been taken from the relevant transport information provided with the ES for those other projects. This is not an unreasonable position as a starting point, but Sizewell C and EA2 are progressing so more information is coming forward from those promoters of those projects which is</p>	

<sup>2</sup> Details of the A12 MRN proposals can be found at <https://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0170%2F25SC>

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	<p>which is updating some of their traffic information. Whilst the full detail is a matter for a technical discussion outside of the hearing, SCC would be anxious to ensure that the most appropriate, up to date information is being used in the further modelling work which is to be undertaken so the Applicant has the best picture of the current position.</p> <p>For example, the Construction Transport Management Plan for EA1N and 2 to provide new information on their construction, traffic numbers etc and that's what SCC would expect to see being considered.</p>	
13.4	<p><b>Cumulative impact of traffic and the coordination with other projects</b></p> <p>SCC stated which cumulative developments should be included in traffic assessments. These should include SPR, Sea Link, Sizewell C, LionLink and Solar such as Helios, where, albeit, there is a lack of information currently. Essex and Suffolk Water pipeline from the north held a non-stat consultation in December so if any information is available for that SCC would like to see this because this is likely to overlap with the end of Sea Link construction.</p> <p>SCC confirmed that journey time information would be very useful as it relates back to cumulative impacts. One issue raised by SCC and others is not just the traffic up and down the A12 and A1094 but also the disruption of routes across the A12. This has been raised through the Sizewell Transport Review Group.</p> <p>SCC stated that while the council is comfortable with the Applicant assessing the peaks with the traffic distribution associated with each of the projects, there is not just a single peak. There is a highest peak, but there are several peaks, for example SPR which has a peak at the beginning of the substation where the road has been constructed, there is also another peak towards the end when the road is removed. Therefore, the Applicant's is not a secure profile. In terms of key dates, 2028 - 2029 is key because this</p>	<p>REP2-062</p> <p>REP3-101</p>

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	<p>is likely when SZC will move from early years to their peak years which will increase HGVs and redistribute its traffic on the network.</p> <p>Not only do projects have multiple peaks, they also may have prolonged periods of elevated traffic not captured within the Applicant’s assessment approach. The HGV numbers for Sizewell C, for instance, will likely remain at or near the permitted cap for most of the project’s lifetime. A similar point goes for the project’s worker number which is permitted to increase once the park and ride facilities are open which occurred recently.</p> <p>In REP3-070 1TT1 the Applicant referred to the probability of peaks in various projects coinciding. SCCs main interest is in the peak cumulative impact not just the coincident of individual peaks. Additional data is becoming available for this area of Suffolk in relation to NSIPs and baseline traffic.</p> <p>These are:</p> <ul style="list-style-type: none"> <li>SPR EA2 CTMP for the substation which includes the revised program, HGV movements and workforce for that project</li> <li>Quarterly Transport Reports and Traffic Surveys relating to SZC</li> <li>Greater details on program, HGV movements and workforce from the Sealink project</li> <li>Information within the Lionlink statutory consultation.</li> </ul>	

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	<p>In SCCs view this should allow the programs for each project to compared over time and identify the maximum cumulative impact. Obviously, there is an element of change that can affect these forecasts but would provide a realistic worst-case scenario against which actual data can be compared.</p> <p>Plate 5.1 of the CTMP indicates a construction period from early 2027 to 2032 which overlaps with :</p> <ul style="list-style-type: none"> <li>SPR EA2 completing end 2028 (from CTMP)</li> <li>SZC</li> <li>LionLink commencing 2028 and operational by 2032 (Statutory Consultation Jan 2026)</li> <li>A12 MRN scheme commencing 2027 and completing late 2028</li> </ul>	
13.5	<p><b>Controls on construction traffic</b></p> <p>SCC was not requested to make oral representations on this item. SCC wishes to make the following written comments which are intended to be read in conjunction with its previous representations on construction traffic controls such as in chapter 11 of the LIR [REP1-130]:</p> <p>Securing HGV route beyond the current scope of assessment, for example restrictions within the CTMP to ensure all HGVs use the A12 between the A12/A14 Seven Hills junction and the A12 Bloodmoor Road Roundabout (Lowestoft) to avoid use of lower category local roads. Table 7.1 (APP-122) only refers to the forecast peak <b>total</b> construction movements (68 HGV deliveries / 136 HGV movements) table 7.25</p>	REP2-062

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	<p>of the Transport Assessment not the peak daily HGV movements (173 HGV deliveries / 346 HGV movements) in table 7.26. With the higher proportion of HGVs, and that they are not concentrated outside peak hours through shift pattern working they are likely to have a greater impact on the performance of a junction throughout the day. Note also comments about the lack of HGV movements before 0800 compared to other NSIPs and the potential for worker shift movements to create a new network peak.</p> <p>Controls on HGV movements (as caps), for</p> <ul style="list-style-type: none"> <li>• Daily HGV movements on key routes</li> <li>• Maximum HGVs at peak hours and shoulders, again on key routes</li> <li>• Compliance with agreed routes and timing (CTMP 7.7.2) but unclear strength of 'additional measures' and strength of enforcement (8.6.1).</li> <li>• Emission controls</li> </ul> <p>Use of the B1119 east of Saxmundham: SCC seeks clarification of the quantum and necessity of use of the B1119 east of Saxmundham for pre-commencement and construction activities., specifically the number and duration of movements associated with construction of the eastern abutment of the Fromus Bridge and associated activities. Due to the sensitivity of this route, SCC would seek to have caps agreed in terms of vehicle number and duration.</p> <p>All of the above should aim to secure the volumes assessed in the application so that the impacts are no greater than assessed</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>In terms of workers, monitoring of and commitments regarding:</p> <ul style="list-style-type: none"> <li>• Workforce numbers and either car share ratios or worker vehicles arriving and departing from site</li> <li>• Conformance with the assumptions in the Transport Assessment specifically journey times on the network</li> <li>• Management of antisocial activities such as fly parking, use of inappropriate access routes</li> </ul>	

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15	<b>Socioeconomics and Tourism</b>	
15.1	<p><b>Effects and potential reputational impact on the tourism industry of Suffolk and Kent as a result of the proposed development</b></p> <p>Word of mouth and perception problems resulting from potential construction traffic, diversions etc which, along with Sizewell C and other NSIPs proposed or underway, could add to false perception of Suffolk as a building site/car park. Whilst there will undoubtedly be short-medium term benefits for visitor economy sector arising from construction accommodation etc, we need to ensure that we still have a thriving long-term visitor offer.</p> <p>Road closures and traffic delays pose problems for business. Visitor economy could be acutely affected by e.g. delays to food deliveries etc.</p>	

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15.2	<p><b>Tourism accommodation capacity –</b></p> <p>The Applicant has assessed that under a worse case scenario for Sea Link there would be spare capacity for both workers and tourism at peak times for accommodation.</p> <p>SCC are still reviewing information provided by the Applicant at Deadline 3, but the Council is so far not persuaded that there is sufficient surplus that would mean there is not accommodation pressures, and therefore SCC would see accommodation for construction workers potentially competing with and therefore displacing accommodation which would otherwise be available for the tourism sector.</p> <p>SCC is concerned that the assessment of accommodation which the Applicant has undertaken has not included, as a measure, the cost of accommodation across different types or indeed the knock-on costs in terms of private rented sector accommodation which is being drawn on. If there was an influx of demand for that sector, within that, what the consequences are on that sector, which not only serves the needs of the tourism sector but also the needs of the construction workers.</p> <p>The accommodation also serves some of the local populus, so there is a wider community impact. Further discussion is required with the Applicant but there needs to be some movement, as currently from the Applicant's assessment no significant impacts have been found and therefore there is nothing to mitigate, which is a stance the Council believes needs to change.</p> <p>Peak construction phase will have an impact on tourism accommodation, especially when cross-over with other large-scale NSIPs occurs. It is important that all parties recognise the cumulative impact of multiple large-scale construction projects and plans accordingly. Suffolk has a year-round tourism economy and is a popular location for weekend and off-season breaks. Whilst there would clearly be</p>	

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	some business generated as a result of this work, it is important that the accommodation sector is not completely overwhelmed, to the extent that the tourism sector is adversely affected.	
15.3	<p><b>Skills and Employment Plan and labour market effects</b></p> <p>Suffolk County Council’s position remains that the Applicant’s approach to labour-market assessment and skills is inadequate, lacks evidential robustness, and fails to reflect the cumulative NSIP context in Suffolk. Key assumptions (such as the uniform 60-minute labour catchment, the notional 30% local labour estimate, and the high leakage attributed to specialist roles) are untested, unsupported, and incompatible with both SCC’s evidence base and the wider regional picture. As set out in the Local Impact Report (LIR) [REP1-130], the Applicant has not provided a meaningful workforce baseline, nor any assessment of local skills supply, training capacity, or realistic levels of local employment (SCC LIR, Socio-economic Impacts Section). SCC’s ExQ1 responses [REP3-101] also highlight the absence of detailed labour modelling and the failure to demonstrate how Sea Link’s labour demand interacts with other NSIPs, including Sizewell C and the East Anglia offshore wind projects, all of which draw from the same constrained workforce (SCC ExQ1, Workforce and Skills Questions).</p> <p>SCC rejects the Applicant’s conclusion that the local labour market is of “low sensitivity.” In reality, labour-market sensitivity is medium to high, reflected in already-observable shortages across construction, civils, and electrical trades. The CITB Workforce Outlook and the Clean Energy Jobs Plan confirm this, and both identify significant labour shortages, long lead-in times for specialist skills, and peak overlaps between major infrastructure programmes.</p> <p>The Applicant’s continued reliance on a 60-minute travel-to-work area is neither evidence-based nor reflective of actual labour behaviour in Suffolk; this approach excludes 10% of the available workforce and therefore underrepresents the true catchment. Further, the Applicant has acknowledged that it</p>	<p>REP1-130</p> <p>REP3-101</p> <p>RR-5209</p>

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	<p>cannot produce a worst-case workforce scenario because it does not have full information on the skills required for each construction phase. As noted in SCC's Relevant Representations (May 2025) [RR-5209], this omission undermines the credibility of the labour-market assessment as it precludes any evaluation of peak labour requirements, displacement risk, wage competition, or pressures on local services.</p> <p>The absence of a structured Skills and Employment Plan is therefore a fundamental gap. Without this, there are no mechanisms to secure apprenticeships, local training pathways, workforce targets, or SME participation. Equally concerning is the Applicant's failure to engage substantively with SCC's Regional Skills Coordination Function (RSCF), the established mechanism for coordinating skills interventions across NSIPs. As emphasised in SCC's Deadline 2 Comments, engagement with the RSCF is essential to prevent duplication, avoid competition for training resources, and develop a coherent skills pipeline across promoters. The lack of such engagement increases the risk of unmanaged cumulative impacts and undermines confidence in the Applicant's conclusions.</p> <p>SCC therefore maintains that a DCO Requirement securing a robust Skills, Employment and Supply Chain Plan, aligned with, and governed through, the RSCF, is essential to avoid significant adverse labour-market impacts and to secure a meaningful local legacy.</p> <p>SCC recognises that the Applicant has been requested to produce skills and employment plan. SCC would be supportive of such a plan for the scheme at a scale which would make it a worthwhile endeavour, considering the specialist skills shortages and the requirements for this and other NSIPs that are planned for the area. NSIPs are heavily concentrated and there is a sensitive labour market in Suffolk, so skills and employment plan would be a positive way forward to support this issue. SCC has detailed what it expects to be included in this plan.</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
15.4	<p><b>Socioeconomic positive effect potential</b></p> <p>SCC did not make oral representations on this matter. SCC wishes to make the following relevant written comments:</p> <p>Suffolk County Council acknowledges that the Sea Link project has the potential to deliver socio-economic benefits to the region; however, the current application fails to secure them and does not reflect the cumulative realities facing Suffolk. The Applicant continues to rely on theoretical indirect multipliers and high-level statements of potential benefit, while offering no structured, enforceable mechanism to ensure delivery. As noted in SCC’s Local Impact Report, the Applicant has not produced evidence-based estimates of local employment, supply-chain engagement, or training outcomes, nor has it proposed governance arrangements to monitor and adapt its approach (SCC LIR, Economic Impacts Section) [REP1-130].</p> <p>The Applicant’s conclusions on socio-economic potential are further weakened by cumulative assessments that are inconsistent with the available regional evidence. Assertions that cumulative effects would be “not significant” or “unlikely to arise” are contradicted by:</p> <ul style="list-style-type: none"> <li>• the CITB Workforce Outlook, forecasting substantial shortages across construction, electrical installation and civil engineering;</li> <li>• the Clean Energy Jobs Plan, which identifies escalating competition for skilled labour across the East due to the concentration of infrastructure projects;</li> <li>• and SCC’s Energy and Climate Adaptive Infrastructure Policy, which highlights growing pressure on labour, supply chains, accommodation, and local services as NSIP activity intensifies.</li> </ul>	REP1-130

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	<p>These documents present a coherent picture of a labour market under strain, contrary to the Applicant's conclusions. The continued reliance on a uniform 60-minute travel-to-work area, despite excluding a proportion of the available workforce, undermines the Applicant's assessment of labour availability. This incomplete catchment area feeds directly into misestimation of labour supply, procurement trajectories, and local service demands.</p> <p>Further, the Applicant has been unable to provide a meaningful worst-case scenario due to a lack of phase-specific workforce detail. As set out in SCC's ExQ1 responses [REP3-101], this prevents the modelling of peak workforce periods, procurement capacity, and cumulative interactions with other NSIPs. Without such detail, the benefits claimed by the Applicant remain speculative and unsupported.</p> <p>Finally, the Applicant has not meaningfully engaged with the Regional Skills Coordination Function, despite this being the established mechanism for coordinating skills, education, and labour planning across NSIPs. The failure to use this function exacerbates risks around workforce competition, and unequal distribution of socio-economic outcomes and undermines the likelihood that positive effects will be realised.</p> <p>Overall, SCC maintains that the socio-economic benefits cited by the Applicant will not materialise without secured interventions. A binding Skills and Employment Plan aligned with the RSCF, including a long-term legacy plan, is essential to ensuring benefits extend beyond construction. Without these measures, the project is likely to deliver limited local benefit while leaving Suffolk communities exposed to the cumulative burden of overlapping NSIPs.</p>	REP3-101
16	<b>Health and Wellbeing</b>	
16.1	<b>Core working hours, in relation to effects on traffic, health and wellbeing and noise</b>	

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	<p>Working hours, as currently proposed by the Applicant, provides no real respite to local communities, whereas restricted core hours that the local authorities wish to see will provide periods of opportunity for respite from construction related noise, vibration, traffic, air pollution, and disruption. SCC has made detailed submissions on these effects, including their inadequate reflection in the Applicant’s assessments [APP-058] and [APP-060]. In short, continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities.</p> <p>SCC recognises that there will be some circumstances where there will be operational reasons why it is not appropriate to adhere to those restrictions. However, this is a massive project with a massive amount of project management going with it, and SCC does not think that it is beyond the power of competent project managers to anticipate when particular elements become critical elements, and therefore need to be potentially the subject of a departure from the norm.</p> <p>SCC notes that every restriction is in one sense a reduction in flexibility. But it's a question of why are you doing it? And therefore, is there a good justification for doing it? And SCC believes in the point of providing respite to the community, there is a good justification.</p>	

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	<p>The Applicant gives a reason for the core working hours as they say there is a criticality to hitting the 2030 deadline, which means that they cannot afford to allow for any slippage in their timetable. Also, if they were to slip in their timetable, there is a question of constraint costs through the payments that are made to others who could otherwise use their system, but it is not available.</p> <p>Considering what the applicant has provided at the moment in the project description, it still proceeds on the assumption that the development consent order will be made at the end of quarter two, 2026, at which is not correct. What is not clear is if you put in a more realistic date for the likely date of the development consent order, what impact that has on the project, because you have got a series of timelines and a series of bars, but it's not articulated as to what if you took a more realistic date, which presumably would be at the end of quarter four of 2026.</p> <p>What effect would this slippage have on the other steps in the sequence. SCC thinks that it is likely that it means that effectively, the 2030 date for energisation of the scheme is not realistically achievable in any event. But SCC would welcome some clarification on that point.</p> <p>Regarding the constraint costs as SCC understands it. That is a reference to some figures in the NESO report on achieving 2030, but obviously what the applicant has done, is present some figures SCC has not seen where the arithmetic that leads to those conclusions that whether it's 33 weeks, it equals so many million pounds, it would be very helpful if the applicant could provide a supplementary note, probably at deadline four, which just explains the working of how they have achieved those figures.</p> <p>The Applicant has presented a global figure to all consumers. Obviously, it goes to individual consumers bills, and SCC understands that consumers would not like the idea of energy bill rises, but in terms of a point that we have sometimes made in these DCO contexts, there is a balance between national gain and local pain. It’s a relevant factor that this burden is being imposed on the local communities of</p>	

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	<p>Suffolk. When considering potential constraint costs, these ought to be capitalised to per capita, rather than just the global figure that the Applicant has given.</p> <p><u>Additional comments:</u></p> <p>In any case, the facilitation of any acceleration in programme cannot, in policy terms, come at the cost of mitigation. EN-1 is quite clear that, even for projects falling under CNP policy, the mitigation hierarchy must be followed. SCC has given extensive justifications for its position regarding the inadequacy of the Applicant's assessment of effects on health and wellbeing particularly when considering the extensive cumulative development context. Given the shortcomings of the Applicant's assessment, in addition to the uncertainties of how effects will actualise from this project in combination with multiple other major infrastructure projects in the vicinity, SCC considers that a precautionary approach must be taken whereby available mitigation measures are implemented. This position is supported by what is said in paragraphs 4.1.7 and 4.2.15 of EN-1 in terms of the presumption in favour of CNP infrastructure not outweighing "unacceptable risk to, or interference with, human health". Without robust evidence demonstrating otherwise, SCC considers that its representations have motivated the notion that the risk to human health is unacceptable without change to the application. Therefore, the Applicant's claim that extended working hours are necessary to accelerate delivery of the project is untenable in policy terms given the risk to human health. SCC also considers that, following this precautionary approach, further mitigation measures, including commitments to monitoring and adaptive management, are necessary to meet these policy requirements.</p> <p>Given the importance, including in policy terms, of human health in light of SCC's representations on the inadequacy of the Applicant's assessment (see Chapter 14 of [REP1-130] and Table 3.10 of SCC's SoCG [REP3-052]), SCC considers further exploration of the potential effects and mitigation of health and wellbeing impacts is essential. This is particularly relevant in East Suffolk's context of intense</p>	

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	<p>cumulative NSIP development which creates substantial uncertainty over what effects will actualise given the magnitude of the development, the uniqueness of the context and the multitude of ways in which people’s wellbeing can be impacted by such development.</p> <p>To be clear, this issue goes beyond the matter of core working hours as restricted hours will not fully mitigate potential adverse effects on health and wellbeing. People will be affected, to greater and lesser extents, throughout the project’s construction and operational periods whether on account of cumulative traffic, restricted PRow access, temporary and permanent changes to the landscape, noise, or by works both inside and outside the core working hours, to name a few. Existing evidence simply cannot allow us to make robust conclusions about how these various factors will likely impact people’s perception, experience and lives when such drastic and rapid industrial activity is introduced to a previously predominantly rural area for such a prolonged period and to an intensity not yet close to peaking.</p> <p>In short, when considering both the uniqueness of the characteristics and demographics of the local population and region, in addition to the uniqueness of the cumulative context, existing evidence of observed effects from other projects is limited in its relevance and application. These factors also mean predictions of likely effects on people’s health and wellbeing are difficult to make with confidence, particularly concerning how people’s mental health and wellbeing will be affected.</p> <p>Therefore, SCC urges further exploration of these matters, particularly in relation to mitigation, whether by further ExQs or ISHs. SCC considers that the opportunity presented by an ISH for those who will be affected to make representations, along with the value of such evidence to the ExA when making conclusions on how people will be affected, mean that an ISH on these matters would likely be the most effective route.</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
16.2	<p><b>Light Pollution Effects on Health and Wellbeing</b></p> <p>SCC did not make oral representations on this matter. SCC wishes to make the following relevant written comments:</p> <p>SCC Public Health have not previously commented on light pollution in relation to the Sea Link application and do not have the technical expertise to be able to provide a view on the specifics of light pollution and whether proposed levels are appropriate.</p> <p>East Suffolk Council are responsible for the monitoring and management of artificial light and so Suffolk County Council will defer to them on this matter.</p> <p>However, as it has come up as an agenda item, we welcome the opportunity to highlight the health impacts associated with light pollution, particularly artificial light at night (ALAN).</p> <p>Evidenced negative impacts of light pollution include suppression of melatonin and disruption of the circadian rhythm, which can contribute to: sleep disorders, mood and mental health disorders, obesity, cancer, cardiovascular disease, and difficulties with fertility and reproduction (<a href="https://www.cape.ac.uk/wp-content/uploads/2023/07/Dated-POST-light-pollution-review-RREAL-2.pdf">https://www.cape.ac.uk/wp-content/uploads/2023/07/Dated-POST-light-pollution-review-RREAL-2.pdf</a>).</p> <p>Some types of air pollution, such as smoke, can also worsen light pollution by causing light to scatter and brighten the night sky further (<a href="https://www.cape.ac.uk/wp-content/uploads/2023/07/Dated-POST-light-pollution-review-RREAL-2.pdf">https://www.cape.ac.uk/wp-content/uploads/2023/07/Dated-POST-light-pollution-review-RREAL-2.pdf</a>).</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>SCC notes that there are several actions within the Outline CoCP, REAC which relate to the management of light pollution:</p> <ul style="list-style-type: none"> <li>• [REP3-076] GG10 <i>“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...”</i></li> <li>• [REP3-076] GG21 <i>“Construction lighting will be of the lowest levels necessary to safely perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and habitats (e.g. watercourses) and designated conservation sites.”</i></li> <li>• [REP3-078] GG38: <i>“The operational external lighting systems at the proposed converter stations and substations in Kent and Suffolk will meet the following minimum exterior lighting requirements (which are in accordance with NGET standards): Maintained average illuminance: 6.0 lux; Maintained minimum point Illuminance: 2.5 lux.”</i></li> </ul> <p>SCC expects that these will be monitored accordingly with any light pollution related complaints or exceedances in illuminance to be dealt with swiftly to protect the health and well-being of local communities. SCC would support any position made by local planning authorities which considers further controls to be necessary to adequately mitigate effects of light pollution.</p>	

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17	<b>Climate Change</b>	
17.1	<p><b>Matters relating to R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council judgment</b></p> <p>SCC noted that there is still considerable uncertainty within all environmental disciplines as to how to consider the Finch Supreme Court judgement, and matters are still evolving.</p> <p>SCC has reviewed the Applicant's response and are content that there are good reasons in this instance for its position given the uncertainties as to who the end user might be of generated electricity and the transmission of energy to effectively anonymous, indeterminate users.</p> <p>SCC are prepared to accept that this is one of those instances where if you apply the Finch ruling, it is not possible to do an assessment, and you would reasonably conclude in this case that it would not be possible to further assess the downstream implications. So, SCC are content with the Applicant's explanation.</p>	REP3-101

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18	<b>Water Environment</b>	
18.1	<p><b>Matters relating to flooding and the adequacy of the Flood Risk Assessment (FRA)</b></p> <p>SCC reviewed the drainage strategy submitted at Deadline 3, which had a supplementary amendment which was requested by the EA. SCC has reviewed the strategy and is generally content, although notes that, with regards to surface water maps, the climate change allowance has not been adhered to which is required with regard to the sequential and exception tests.</p> <p>Regarding the drainage strategy, national standards for sustainable drainage come in during the latter part of 2025. Whilst the Applicant has suggested they are adhering to this, the Council does not consider that the runoff destination has not been adequately reviewed. The updated national standards make priority one destination for runoff to be the collection of non-potable water which is not reflected in the Applicant's documentation.</p> <p>So, regarding water reuse, SCC would like clarity from the Applicant on how they are going to reuse water both during the operational phase of construction and also decommissioning.</p> <p>Regarding the operational phases, SCC has received an outline strategy in two parts, one in the FRA and also volume in the Examination submission document 9.17.1, the Suffolk Drainage Strategy. SCC still feels that is lacking in detail for SCC to take forward. SCC happy to have further discussions with the Applicant outside of the Examination.</p> <p>SCC has detailed these outstanding issues, including with regards to how drainage matters are secured in the DCO, in response to Action Point 81.</p>	

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	<p>SCC's guidance which lists out the document requirements for the drainage strategy, including hydraulic assessment of the runoff rates, typical cross sections of SuDs features which are being proposed, assessment of runoff destinations as per the National Standards for Sustainable Drainage, impermeable flood plan, flood exceedance, flow paths. So, there is information SCC would ask for which would give SCC a good indication that the strategy has been considered in full and can be implemented.</p> <p>SCC notes that with Kiln Lane Substation, which is being delivered by SPR, an infiltration basin is included as part of the development.</p> <p>Regarding if the substation was delivered by the Sea Link DCO, the Applicant would need to satisfy that an infiltration basin could be used on the site. SCC would also require the detail relating to the Saxmundham converter station and how the surface water will be managed with regard to the attenuation basins and they would provide biodiversity and amenity value.</p> <p>SCC would look for information in advance of the REAC including SuDs details to ensure it meets with the SCC guidance with regards to design of the side slopes, exceedance etc.</p> <p>SCC would like to see construction surface water drainage management included of the DCO submission which would cover construction and decommissioning of the site if it is consented.</p> <p>SCC highlighted outstanding concerns regarding the adequacy of the outline management plans in relation to minimising the residual risk for surface water flooding. SCC would like to clarify that its concerns regarding the lack of an outline plan relate to the operational drainage management plan listed in Requirement 6 which has no reference to an outline plan. SCC recognises that, as an appendix to the FRA, an outline surface water drainage management plan was produced, in addition to the supplementary Suffolk Drainage Strategy. SCC's comments regarding lack of detail relate to these</p>	

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	documents. As for the DCO, SCC understands that these documents, nor any others, are secured as outline plans for operational drainage in Requirement 6.	
18.2	<p><b>The application of the sequential and exception tests</b></p> <p>SCC is concerned that it has not been adequately demonstrated that where there are temporary construction works, whether it is for the storage of materials and or temporary accesses to enable construction, which are located within flood zones, that these can be justified by reference of a sequential test.</p> <p>SCC is not currently persuaded that there has been enough information submitted to show that there are not lower risk locations for a number of these facilities.</p> <p>Regarding the exception tests, it broadens out into a wider issue in terms of whether or not there are wider sustainability benefits which bring into account the need for the project and the extent to which the overall package of measures put forward by the Applicant has sufficient local community benefits to feature in that application of the exception test that you could reach judgement.</p> <p>SCC does not feel that it can come to a conclusion at this stage as elements of the project and the associated benefits that go with it are still unfolding. SCC has detailed its position in response to Action Point 86.</p>	
18.3	<p><b>Effects on the achievement of the environmental objectives of the Water Framework Directive</b></p> <p>SCC did not comment on this item.</p>	

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20	<b>Cumulative Effects</b>	
20.1	<p><b>Intra and inter-project cumulative effects</b></p> <p>it is not acceptable for significant effects to go unmitigated without offsetting unless it has been demonstrated that offsetting is not possible. SCC considers effects on PRow, for instance, can be successfully offset and that there may be potential for additional landscape planting mitigation around the converter station site in line with ESC's suggestion supported by SCC in [REP2-062]. There may be potential for landscape offsetting measures which should be explored by the Applicant.</p> <p>SCC suggested that using a precautionary approach would be appropriate in considering the level of uncertainty, and do not see what this could not be applied to provide a magnitude to the degree of significance that the Applicant has found from their intra project cumulative effects.</p> <p>SCC is concerned regarding some deficiencies in some of the existing REAC commitments which were listed in the Council's response to EXQ1 [REP3-101]. SCC notes it would be helpful for the Applicant to respond to these issues raised.</p>	<p>REP1-130</p> <p>REP2-062</p>
20.2	<p><b>Mitigation of cumulative effects</b></p> <p>SCC believes there is a shortcoming in the degree of coordination by the Applicant with other NSIPs in the area. More needs to be done, particularly in relation to coordination with landscaping, especially in the vicinity of Friston, more coordination on the converter station and LionLink, and more in relation to AIL routes.</p>	

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	<p>The Applicant should explore measures to avoid, reduce, mitigate and if possible, offset significant cumulative effects as per EN-1. SCC does not consider this to be sufficiently demonstrated for residual significant cumulative effects (as per previous submissions)</p> <p>PINS Advice Note 17 states:</p> <p><i>“As a minimum, applicants are expected to include the mitigation necessary to address impacts associated with their proposed NSIP. Apportionment of effect and mitigation between projects may be acceptable subject to justification and agreement with relevant consultation bodies. This would need to be evidenced in the Environmental Statement.</i></p> <p><i>Where possible, applicants should consider opportunities to develop holistic mitigation strategies in collaboration with other relevant bodies identified in the CEA, including developers. For example, the National Policy Statement for renewable energy infrastructure (EN-3) at paragraph 2.8.48 encourages applicants to work collaboratively on shared mitigation for offshore infrastructure and activities and to evidence agreement through statements of common ground. The method to secure such mitigation should be agreed between the applicant, its legal advisors and other relevant bodies.”</i></p> <p>SCC does not consider the latter paragraph to have been sufficiently explored. Whilst commitments to coordination are appreciated, they fall short of collaborative mitigation strategies.</p>	
21	<b>The Draft Development Consent Order</b>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
21.1	<p><b>Article 10 – The effect that article 10 would have with respect to the interface with existing consents, such as the Scottish Power Renewables (SPR) East Anglia 1 and East Anglia 2 DCOs and future consents, such as LionLink. How the relevant planning authorities would see articles 10 and 56 operating in practice including, for example, the discharge of requirements</b></p> <p>Summary of SCC's oral submissions:</p> <p>SCC requested clarity from the Applicant regarding the wording of paragraph 10, in terms of subclause (a) regarding the Applicant is planning to include which would be otherwise covered by Art 10 (1).</p> <p>If a planning permission is issued pursuant to the TCPA 1990 for development, any part of it which falls within the Order Limits following the publication of this order, that is not itself an NSIP under the 2008 Planning Act or part of such a project, and therefore be required to complete or enable construction or operation of any part of the development authorised by this order.</p> <p>Sea Link has come into the 2008 Act regime by means of a s35 Direction and therefore, as SCC reads it, the project would not fall into the scope of Art 10 (1a) but could fall into (1b).</p> <p>SCC stated its wishes to seek clarification from the Applicant that that is how they understand the working of Art. 10 (1) because various issues follow on from this.</p> <p>SCC stated that the wording of Art 10 (1) does not currently work regarding s35 issues.</p> <p>Through article ten, to have the flexibility to then bring forward a Town and Country Planning Act application for some part of this project, which may be the same as what is proposed in the development consent order, or maybe a variation or adjustment of that, might differ from something</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>which is already approved, is probably more straightforward than bringing a change application forward under the 2008 act regime</p> <p>SCC would be anxious, having gone through this examination and secured whatever package of mitigations are put in place, that there isn't then a kind of bypass route around that.</p> <p>Another point relates particularly to the overlap with the East Anglia one North and East Anglia two development consent orders. SCC made reference during ISH 1 to not wanting to allow for any resigning from the mitigations of EA1N or EA2. Where the projects overlap, SCC want to be assured that this clause simply to deal with Hillside and does not enable derogation from the mitigations which have already been endorsed.</p> <p>SCC noted that they would need to liaise with Sharpe Pritchard the drafting legal advisors regarding the wording of Art 10 (1).</p> <p>SCC sets out its understanding of how article 10 functions:</p> <p>By article 10(1), if planning permission is issued under the Town and Country Act 1990 (“<b>TCPA</b>”) for development which falls within the Order limits following publication of the Order, and which is required to complete or enable the construction, use or operation of any part of the development authorised by the Order, then the carrying out, use or operation of that development in accordance with the planning permission will not constitute a breach of the Order.</p> <p>In Suffolk, any subsequent planning application would be determined by East Suffolk Council who would be able to attach conditions to a planning permission in the usual way. The planning permission</p>	

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	<p>would not affect the requirements contained in the Order. They would still need to be discharged, in accordance with Schedule 3.</p> <p>By article 10(2), any other planning permissions or development consent orders (issued under the TCPA or Planning Act, respectively) which conflict with the authorised development can proceed without the risk of enforcement action being taken notwithstanding any incompatibility between the authorised development and the development authorised under the planning permission or other development consent.</p> <p>The planning permission or development consent order referred to in article 10(2) would be determined in accordance with the TCPA or Planning Act regime, respectively. SCC would have the opportunity to comment on any such application. While the planning permission should not affect any requirement, it is possible that the development consent order could seek to amend a requirement under the instant Order. (Section 120(5)(a) of the Planning Act states that a DCO may modify or exclude a “statutory provision” – which by section 120(6) includes a provision of an instrument made under an Act, such as DCO – which relates to any matter for which provision may be made in the order. Clearly, provision for a requirement may be made in a DCO). SCC would be able to participate fully in the examination of that DCO (and, indeed, in the pre-and post-examination stages).</p> <p>By article 10(3), development within the Order limits which is constructed or used under a standalone planning permission or development consent order does not prevent the carrying out of any development authorised under the instant Order. This clarification is helpful in the light of the Supreme Court decision mentioned above.</p> <p><b><u>(ii) The practical operation of article 56 (safeguarding)</u></b></p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC stated that as far as Art. 56 is concerned and the safeguarding, noting SCC does not have an issue with Art 56 however it is conceivable that there might be some minerals and waste development which would be made to SCC which could fall within the remit of Art. 56. But generally, SCC are content with the approach taken by the Applicant.</p>	
21.2	<p><b>Article 11(2), article 14(4), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1) with respect to the words “unreasonably withheld or delayed” and the 35 day decision period</b></p> <p>(i) <u>“which consent shall not be unreasonably withheld or delayed”</u></p> <p>Under the draft DCO <b>[REP3-007]</b>, consents are authorised in the main body of the Order and in the requirements (Schedule 3). The words “which consent shall not be unreasonably withheld or delayed” apply to consents authorised in the main body of the Order (i.e. in those articles mentioned above). The words are not used in respect of the requirements.</p> <p>SCC explained its position on the inclusion of these words in paragraphs 15.12 to 15.14, 15.16 to 15.19 and related points in 15.71 to 15.74 of its LIR <b>[REP1-130]</b>. SCC maintains its position in respect of this wording.</p> <p>Owing to the inclusion of the deeming provision, the words mentioned above are superfluous, particularly “or delayed.” Since a decision must, in any event, be made within 35 days, SCC does not understand how it could be “unreasonably ... delayed”, not least since the applicant has proposed that time limit and must therefore consider it reasonable.</p>	<p>REP3-007</p> <p>REP1-130</p>

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC notes that Fenwick Solar Project Limited, the applicant for the Fenwick Solar Farm (a DCO application which is currently at determination stage) amended article 45(2) (procedure in relation to certain approvals) during the examination as follows –</p> <p style="padding-left: 40px;">“(2) Where paragraph (1) applies to any consent, agreement or approval, such consent, agreement or approval must not be unreasonably withheld <b>or delayed</b>”.</p> <p>The change was made at Deadline 1 of that examination on the basis “this drafting is superfluous given there is a deemed approval provision in this Article”. (See the applicant’s <i>Schedule of Changes to the draft Development Consent Order [REP1-046]</i>). SCC agrees with this reasoning.</p> <p>Furthermore, it will be noted that the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 (SI 2009/2265) states in certain provisions – model provisions 14(3) and (4) (discharge of water), 16(4) (authority to survey and investigate land) and 34(3) (railway and navigation undertakings) – that consent (or approval) “shall not be unreasonably withheld” but it does not state consent must not be “unreasonably delayed”.</p> <p>While SCC considers all the text mentioned above should be omitted, at the very least, the words “or delayed” should be.</p> <p>In any case, it is not defined what constitutes unreasonableness in terms of withholding or delaying consents in this context. Even if certain approvals constitute a relatively light piece of work, any number of factors can hinder a local authority’s ability to respond in an accelerated fashion including high volumes of other applications from the project, high volumes from the multitude of other NSIPs being delivered in the region, absences, public holidays and others. Therefore, what appears unreasonable to the Applicant is not a reliable guide to the reality of the situation. Since the wording</p>	<p>REP1-046</p>

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	<p>does not alter the statutory timelines in a defined quantitative way, it is going to be a challenge, and an unnecessary burden, for officers to determine how long is reasonable for the application to be determined outside of the defined statutory timelines which is counterproductive to efficient collaborative working with discharging authorities.</p> <p><u>(ii) the 35-day decision period</u></p> <p>The following text is based on that included in the LIR [REP1-130] at paragraphs 15.15 to 15.19 –</p> <p>While SCC will ensure that any application for consent will be dealt with as quickly as possible – and it has a proven track-record of doing so – it will be remembered that SCC will be receiving, at the same time, a considerable number of requests for approval across several nationally significant infrastructure projects which have already been consented (i.e. East Anglia ONE North Offshore Wind Farm Order 2022 (SI 2022/432), East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/433), Sizewell C (Nuclear Generating Station) Order 2022 (SI 2022/853), Sunnica Energy Farm Order 2024 (SI 2024/802), and National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024 / 958). Forthcoming DCO applications for which SCC will be a host authority include National Grid Electricity Transmission’s Norwich to Tilbury application and National Grid Interconnector Holdings Limited’s LionLink Interconnector application). Officers responsible for the determination of consents under made Orders will also be working on the forthcoming DCO applications, with two DCO examinations currently running concurrently. This places great pressure on SCC’s DCO team.</p> <p>A 35-day decision-making period in this context is unrealistic and potentially detrimental to the effective consideration of applications.</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC considers 56 days would be a more realistic period for determining any application under the Order.</p> <p>Rather than a difficult-to-meet deadline, in SCC's (considerable) experience of determining applications for consent arising from DCOs, the key factor in determining an application expeditiously is the quality of the submission. It is often necessary for (say) SCC in its role as the highway authority to request revised submissions (sometimes several requests are needed) and applicants do not always provide the requested material in good time. There is no question of a local highway authority consenting a submission which is sub-standard because of the risk of compromising highway safety and so, owing to this, and given the deeming provision, SCC would have to refuse such an application within 35 days, unless an extension can be agreed.</p> <p>SCC considers it would be preferable for the parties to have the comfort of a 56-day determining period and changing references in the Order from "... within 35 days (or such other period as agreed by the street authority and the undertaker) beginning with the date on which the application was received ..." to from "... within 56 days (or such other period as agreed by the street authority and the undertaker) beginning with the date on which the application was received ..." would provide that comfort.</p> <p>In addition, SCC has detailed its position in paragraph 15.71 to 15.74 of its LIR [REP1-130] in respect of paragraph 1 (timescales) of Schedule 4 (discharge of requirements).</p> <p>SCC maintains its position and considers the references in the draft DCO [REP3-007] to "... 35 days" should be changed to "56 days".</p>	
21.3	<b>Schedule 3 Requirement 6, the submission and approval of plans</b>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>SCC endorses the approach of having Outline plans which are available at the Sea Link Examination, which are to be followed by detailed plans which will be submitted to a discharging authority, recognising that on some topics it would not be the relevant planning authority.</p> <p>It may be another discharging authority, such as the County Council, because the subject matter might be focussed on highways or on surface water drainage. So, regarding the wording of relevant planning authority, it might need to be ‘relevant planning authority or other discharging authority’ in accordance with what the relevant requirement states.</p> <p>Regarding Requirement 6, items N to Q there are a series of plans, including the minerals and waste management plan and operational drainage plan, which are not preceded by an outline plan.</p> <p>SCC does not consider that the documents which have been seen so far are satisfactory such that these outline plans are not needed. Therefore, SCC would want to see those also dealt with through the vehicle of outline plan followed by a detailed plan which is subject to discharge.</p> <p>SCC is also concerned regarding the wording of Requirement 6 (2) which seem to be limited and does not seek to actually secure REAC commitments which relate to the operational period; therefore, SCC believes this does need further consideration.</p> <p>SCC expressed concerns regarding Requirement 5 (3) which deals with pre-commencement matters. SCC believes there should be a number of pre-commencements matters which need to be subject to either REAC commitments or other controls but currently SCC are reading Requirement 5 (3) as currently drafted as only tying the pre-commencement activities in terms of further control where there is an outline plan listed in Requirement 6 which does not include the REAC. This point on controls for</p>	



Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>instead of the relevant planning authority. A similar formulation is used in requirement 5 (construction management plans).</p> <p>Requirements are the DCO equivalent of planning conditions and one of the six tests for conditions is precision. SCC consider the inclusion of the term “discharging authority”, as defined, in requirements 5 and 6, creates imprecision (because it is not clear who it refers to) and requests that the applicant recasts those requirements so that the body the applicant wants to discharge that requirement is named.</p> <p>The use of “discharging authority” in this ambiguous way is consistent with that used in requirement 4 (management plans) of the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (SI 2024/958) and it has already caused confusion post-consent for SCC. SCC is keen to avoid any confusion in respect of this Order.</p> <p>The preceding text is similar to that included in paragraph 15.34 of SCC’s LIR <b>[REP1-130]</b> and the applicant responded to that paragraph in the <i>Applicant’s comments on Local Impact Report from Suffolk County Council [REP2-026]</i>, (Table 13.1, at paragraph 15.34) which states –</p> <p style="padding-left: 40px;">“The definition of ‘discharging authority’ is deliberately drafted to not name specific authorities or bodies given the different geographies and authorities involved in the Proposed Project. It is not the usual approach to name specific bodies in the draft DCO, and such an approach is well-precedented by other development consent orders and should remain as drafted.</p> <p>However, the Applicant recognises that certainty is required by all parties over which bodies are defined as a discharging authority. The Applicant will work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified.</p>	<p>REP1-130</p> <p>REP2-026</p> <p>REP3-009</p>

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>The Applicant will review the definitions to check whether any amendments can be made for clarity in the next iteration of <b>Application Document 3.1(E) draft Development Consent Order [REP1-036]</b> which will be submitted at Deadline 3”.</p> <p>The next iteration of the draft DCO <b>[REP3-007]</b> was submitted at Deadline 3 (9 January 2025), in which the applicant retained its original drafting.</p> <p>The imprecision therefore remains. SCC considered precision should trump precedent (particularly since the precedent in Suffolk is unhelpful) and its proposed amendments to requirement 6 are set out at the end of this section.</p> <p><u>Responsibility for discharging the management plans</u></p> <p>SCC considers it should discharge the following management plans listed in requirement 6(1) of the draft DCO <b>[REP3-007]</b> because the subject of each plan falls within SCC’s statutory responsibility: (b) Construction Traffic Management and Travel Plan – Suffolk, (j) Public Rights of Way (PRoW) Management Plan – Suffolk, (n) Material and Waste Management Plan, (o) Construction Drainage Management Plan, and (q) Operational Drainage Management Plan.</p> <p>In respect of the documents mentioned in sub-paragraphs (n), (o), (p) and (q), it is not clear why no outline document is being provided. No explanation is provided in the EM <b>[AS-090]</b> at paragraph 5.3.10 (which concerns requirement 6).</p> <p>The preceding text is similar to that included in paragraphs 15.45 and 15.46 of SCC’s LIR <b>[REP1-130]</b> and the applicant responded to those paragraphs in the <i>Applicant’s comments on Local Impact Report from Suffolk County Council [REP2-026]</i>, (Table 13.1, at paragraph 15.46) which states –</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>“The documents referred to are not submitted in outline as the final versions have already been prepared. The Applicant will consider adding additional detail to clarify this point in <b>Application Document 3.2 (D) Explanatory Memorandum [REP1-038]</b> which will be submitted at Deadline 3”.</p> <p>No further detail appears to have been added to requirement 6 in the Explanatory Memorandum submitted at Deadline 3 <b>[REP3-009]</b>. If final versions have been prepared, SCC does not see why these have not been submitted into the examination, nor why a requirement for them to be approved post-consent is in the DCO if they are already prepared.</p> <p>SCC’s preferred position is that each control document is subject to a two-stage process: first, during the examination and second, post-consent when the application is seeking to discharge the relevant requirement. This results in a more robust document being produced once final delivery details are known utilising the local expertise of local authorities. Of particular interest to SCC to follow this two-stage approach should be followed in respect of the documents mentioned in sub-paragraphs (n) and (q). SCC sets out its detailed position on this matter in response to the Applicant’s answer to 101 of ExQ1 <b>[REP3-069]</b> in relation to (n) Material and Waste Management Plan in SCC’s Comments on Deadline 3 submissions. SCC’s respective position on this matter in relation to (q) Operational Drainage Management Plan is given in response to Action Point 81.</p> <p><u>Suggested drafting amendments</u></p> <p>In the light of the above, SCC considers requirement 6 should be amended as follows in terms of naming discharging authorities –</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>6. —(1) No stage of the authorised development may commence until, for that stage, the following plans, <u>code or register</u> as relevant to that stage have been submitted to <del>and approved by the relevant planning authority or other</del> the discharging authority <u>mentioned next to it</u> <del>as may be appropriate to the relevant plan, scheme or strategy concerned</del>—</p> <p>...</p> <p>(b) Construction Traffic Management and Travel Plan – Suffolk (which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan – Suffolk) <u>by Suffolk County Council</u>;</p> <p>...</p> <p>(j) Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk) <u>by Suffolk County Council</u>;</p> <p>...</p> <p>(n) Material and Waste Management Plan (such approval to be given in <u>Suffolk by Suffolk County Council and in Kent by [xxx]</u> and, in any event, in consultation with the Environment Agency);</p> <p>(o) Construction Drainage Management Plan <u>in Suffolk by Suffolk County Council and in Kent by [xxx]</u>;</p> <p>(q) Operational Drainage Management Plan <u>in Suffolk by Suffolk County Council and in Kent by [xxx]</u>;</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>(2) The construction works for each stage of the authorised development and mitigation works to minimise the impact of construction must be carried out in accordance with the relevant stage of the approved plans, <del>code and register schemes and strategies</del> referred to in sub-paragraph (1) or with any amended plans, <del>code or register schemes or strategies</del> that may subsequently be approved by the <del>relevant planning authority or other</del> discharging authority as may be appropriate to the relevant plan, <del>code or register scheme or strategy</del> concerned.”</p> <p><u>Justification for the drafting amendments</u></p> <p>In requirement 6(1), the references to the “plans, scheme or strategy” referred to in the sub-paragraphs (a) to (s) have been replaced with “plans, code or register” because while there are documents called “plans”, “code” and “register” in sub-paragraphs (a) to (s), no document is named a “scheme” or a “strategy”. For consistency with the names given to the documents which follow, these changes should be made. The same change has been made to Requirement 6(2).</p> <p>As mentioned above, SCC considers it should discharge certain documents. The amendments made to sub-paragraphs (b), (j), (n), (o), (p) and (q) of requirement 6(1) identify which documents. In the light of these amendments, SCC considers the existing definition of “discharging authority” can remain.</p> <p>The applicant could include which local authority it wishes to discharge the remaining documents. This change would do away with the imprecision mentioned above.</p>	
21.4	<p><b>21.4 Schedule 3 Requirement 9(2) “reinstatement schemes”</b></p> <p>SCC did not comment orally on this agenda item.</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>SCC would likely feel more comfortable with a blanket requirement to reinstate land suitable for its former use, exempting land within 10 m of the cables, and pointing to requirements that safeguard re-instatement for the exempted land, such as B13 and AS02 etc</p>	
22	<b>Any other business</b>	
22.1	<p>Following ISH 2, SCC has received communications from Interested Parties in the local community raising concerns over the level of exploration of the Need Case of the Proposed Project up to this point and, in turn, requesting that an ISH be held on the matter. SCC also notes that similar representations have been submitted into the examination by local community groups and members. In light of this, SCC would ask the ExA to consider whether an ISH covering need may be appropriate, following a similar approach to the Norwich to Tilbury examination at ISH1.</p>	

**Responses to ISH2 Supplementary Agenda Additional Questions**

Item	Question to:	Question:	SCC Answer:
<b>General</b>			
ISH2.01.	Applicant, local authorities and interested parties (IP)	<p>The Government’s Planning and Infrastructure Act received Royal Assent on Thursday 18 December 2025.</p> <p>The applicant, local authorities and all IPs are invited to submit comments on the new Act in relation to any implications for the examination of this application</p>	<p>Chapter 1 of the Planning Act 2008 (“<b>the Act</b>”) concerns nationally significant infrastructure projects. It includes sections 1 to 13 and SCC’s comments on any implications for the examination of this application arising from those sections are set out below. (In short, save for section 10 SCC (from 18 February 2026) does not consider there are any).</p> <p>Section 1 (national policy statements: review) establishes a new requirement for National Policy Statements (“<b>NPSs</b>”) to be subject to a full review and updated at least every five years. By section 118(1)(a) of the Act, section 1 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 1 is not yet in force. In any event, SCC does not consider this provision would have had any implications for the instant examination.</p> <p>Section 2 (national policy statements: parliamentary requirements) provides an additional parliamentary procedure for making material policy amendments to NPSs. By section 118(1)(a) of the Act, section 2 comes into force on such day as the Secretary of State may by regulations appoint.</p>

Item	Question to:	Question:	SCC Answer:
			<p>At the time of preparing this response, no regulations had been made, and so section 2 is not yet in force. In any event, SCC does not consider this provision would have had any implications for the instant examination.</p> <p>Section 3 (projects relating to water) concerns NSIPs which fall within sections 27 (dams and reservoirs), 28 (transfer of water resources) and 28A (desalination plants) of the Act. By section 118(1)(b) of the Act, section 3 came into force on the day on which the Act was passed i.e. 18 December 2025; however, owing to the fact the instant application does not fall within sections 27, 28 or 28A, SCC does not consider section 3 will have any implications for the instant examination.</p> <p>Section 4 (power to disapply requirement for development consent) provides a new power for the Secretary of State to give a direction disapplying the requirement for development consent for certain specified development falling within the meaning and description of an NSIP in the Act. By section 118(1)(c) of the Act, section 4 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 4 is not yet in force. In any event, SCC does not consider this provision would have had any implications for</p>

Item	Question to:	Question:	SCC Answer:
			<p>the instant examination because an application for development consent has already been made.</p> <p>Section 5 (applications for development consent: removal of certain pre-application requirements) provides that an applicant for development consent will no longer be required by statute to consult statutory consultees, landowners, local authorities and the community before submitting their application to the Secretary of State. By section 118(1)(c) of the Act, section 5 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 5 is not yet in force. In any event, SCC does not consider this provision would have had any implications for the instant examination because the instant application has already been through the pre-application stage.</p> <p>Section 6 (applications for development consent: changes related to section 5) makes changes to the Act based on section 5. Since section 5 is not in force, this section isn't either (see section 118(1)(c) of the Act). In any event, SCC does not consider this provision would have had any implications for the instant examination because the instant application has already been through the pre-application stage.</p>

Item	Question to:	Question:	SCC Answer:
			<p>Section 7 (applications for development consent: acceptance stage) makes several amendments to the application stage of the DCO process. By section 118(1)(c) of the Act, section 6 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 6 is not yet in force. In any event, SCC does not consider this provision would have had any implications for the instant examination because the instant application has already been through the application stage</p> <p>Section 8 (applications for development consent: local impact reports and representations) adds a duty on local authorities who have been invited to submit a local impact report to have regard to guidance about the preparation of a local impact report (“LIR”). By section 118(1)(c) of the Act, section 8 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 8 is not yet in force and SCC is not aware of any guidance (or draft guidance) having been prepared. In any event, SCC does not consider this provision would have had any implications for the instant examination, because SCC has already submitted its LIR.</p> <p>Section 9 (examination of applications for development consent) requires ExAs to have regard to the Initial</p>

Item	Question to:	Question:	SCC Answer:
			<p>Assessment of Principal Issues when making procedural decisions about how a DCO application is to be examined. By section 118(1)(c) of the Act, section 9 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 9 is not yet in force and so the provision does not currently have any implication for the instant examination. If regulations are made and come into force during the examination, whether any implications arise will depend on what the regulations say about the application of section 9 to an application which is already ongoing.</p> <p>Section 10 (applications for development consent: costs) enables the ExA to make an order for costs incurred by persons in relation to a DCO application. By section 118(1)(c) of the Act, section 10 comes into force at the end of the period of two months beginning with the day on which this Act is passed. While section 10 is not yet in force, it will come into force on 18 February 2026 and therefore could have an implication for the instant application because the ExA may, from that date, make an order for costs incurred by persons in relation to a DCO application.</p> <p>Section 11 (Planning Act 2008: right to enter and survey land) makes changes to the way in which persons may be authorised to enter land in order to survey it or take levels in</p>

Item	Question to:	Question:	SCC Answer:
			<p>connection with an application, proposed application for development consent or the implementation of a DCO. By section 118(1)(e) of the Act, section 11 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 11 is not yet in force. While that remains the case, the provision will not have any implication for the instant application. If regulations are made and come into force during the examination, whether any implications arise will depend on what the regulations say about the application of section 11 to an application which is already ongoing.</p> <p>Section 12 (changes to, and revocation of, development consent orders) amends the process set out in Schedule 6 to the Act for making changes to DCOs once granted for NSIPs. By section 118(1)(e) of the Act, section 12 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 12 is not yet in force. In any event, since this provision concerns post-examination matters, SCC does not consider it would have had any implication for the instant examination.</p> <p>Section 13 (planning Act 2008: legal challenges) changes the process for judicial reviews of NPSs and development consent decisions made by the Secretary of State for NSIPs. By section</p>

Item	Question to:	Question:	SCC Answer:
			<p>118(1)(e) of the Act, section 13 comes into force on such day as the Secretary of State may by regulations appoint. At the time of preparing this response, no regulations had been made, and so section 13 is not yet in force. In any event, since this provision concerns post-examination matters, SCC does not consider it would have had any implication for the instant examination.</p>
<p>ISH2.02</p>	<p>Applicant, local authorities and IPs</p>	<p>The following National Policy Statements (NPS) were designated on 6 January 2026: EN-1, EN-3, EN-5. Considering paragraph 1.6.3 of EN-1 (2026) whilst the revised NPS’s will only have effect in relation to those applications for development consent accepted for examination after 6 January 2026 they are capable of being important and relevant considerations in the decision-making process for this application.</p>	<p>SCC notes the updates to the cited NPS and will comment on responses provided by other IPs at Deadline 5.</p>

Item	Question to:	Question:	SCC Answer:
		<p>Applicant: Review the application documents (in particular but not limited to ES part 1, chapter 2 Regulatory and Planning Context [APP-043]) in light of the newly designated NPSs and provide any updates and amendments as necessary. Local authorities and interested parties: Submit any comments in relation to any implications of the newly designated NPSs for the examination of this application.</p>	
<b>Landscape and Visual</b>			
ISH2.022.	Applicant and relevant planning authorities	Requirement 6 of the draft Development Consent Order (dDCO) [REP3-006] does not secure advanced planting, as it only prevents the authorised development	SCC welcomes this proposal and considers these changes should be made. Regarding article 2, the definition of “pre-commencement operations” could be amended to include a new sub-paragraph (m) “advanced planting”. Requirement 6 (construction management plans to be approved) could then

Item	Question to:	Question:	SCC Answer:
		<p>from commencing, so could not be enforced for advanced planting. It therefore needs to be secured separately in the dDCO. Could advance mitigation planting be added to pre-commencement operations in article 2, with a requirement that pre-commencement operations cannot be carried out until details of advance planting are approved with a timetable for their implementation? Suggest some wording.</p>	<p>be amended as follows, with the following provisions added after existing requirement 6(2) –</p> <ul style="list-style-type: none"> <li>(3) No stage of the authorised development may commence, including any pre-commencement operations, until, for that stage, a detailed scheme of advanced planting, prepared in accordance with sub-paragraph (4), has been submitted to and approved by the relevant planning authority.</li> <li>(4) The scheme mentioned in sub-paragraph (3) must include – <ul style="list-style-type: none"> <li>(a) a plan of the proposed advanced planting drawn to a scale suitable to convey the undertaker’s proposals for it,</li> <li>(b) details of provenance, soil preparation, cultivation and other operations associated with plant and grass establishment,</li> <li>(c) schedules of plants which detail species, plant sizes and proposed numbers and densities,</li> <li>(d) a timeline for implementation,</li> <li>(e) means of protection, including additional protection required during the construction phase, and</li> </ul> </li> </ul>

Item	Question to:	Question:	SCC Answer:
			<p>(f) an aftercare programme, prepared in accordance with the Overarching Landscape and Ecology Management Plan.</p> <p>SCC also considers that Requirement 6 should prohibit commencement of the authorised development (including any pre-commencement operations), until a vegetation retention and removal plan, has been submitted to and approved by the relevant planning authority.</p>
<b>Design</b>			
ISH2.028.	Applicant and relevant planning authorities	Provide suggested wording for adding this to article 5 of the dDCO.	SCC intends to consider the Applicant's suggested amendments to article 5 and will then comment on the same at Deadline 5. SCC will seek to liaise with other authorities before doing so.



## Responses to ExA Action Points from ISH2

No	Action Point	SCC Response
<b>Landscape and Visual</b>		
46.	Heritage Coast – Notwithstanding the applicant’s response to the written question, define the natural beauty and special character of the Heritage Coast.	<p>Heritage Coasts were defined by agreement between the relevant maritime local authorities and Natural England to conserve the best stretches of undeveloped coast in England.</p> <p>In Suffolk, the absence of a coastal road and widespread development imparts a rural character to the terrestrial hinterland of the Nearshore Waters SCT (Suffolk Landscape Character Assessment).</p> <p>Onshore, the natural beauty indicators of the Suffolk Heritage Coast align with those of the Suffolk and Essex Coast and Heaths Area of Outstanding Beauty (AONB). Unlike the AONB, the Heritage Coast extends into near shore coast waters (which, in the case of the AONB, are considered part of the setting) and considers the marine environment and activities there.</p> <p>The Touching the Tide Landscape Character Assessment, Final Report, August 2012, identifies the Thorpeness to Aldeburgh Coast as the smallest coastal character area of the study. It is characterised as <i>‘an expansive, open, windswept landscape and this sense of scale is strongly contrasted with the small-scale, sheltered character of the settlements.’</i> ... <i>‘Within the drained marshes...are areas of scrub vegetation which provide visual structure.’</i> ... <i>‘From the beach and seafront there are open views across open water with boating activity</i></p>

No	Action Point	SCC Response
		<p><i>focused around the fishing fleets and occasional views to distant container vessels in the North Sea.’ (page 25).</i></p>
47.	<p>Having regard to paragraph 5.10.11 of National Policy Statement (NPS) EN-1, can you explain whether you consider the development is compatible with the special character of the Heritage Coast?</p>	<p>Paragraph 191 of the 2025 NPPF states:</p> <p><i>‘Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.’</i></p> <p>Policy N5.2 of the 2026 consultation document for the NPPF states:</p> <p><i>‘Development proposals in areas defined as Heritage Coast (and that do not already fall within a protected landscape), should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast should not be supported, unless it is compatible with its special character.’</i></p> <p>Paragraph 5.10.11 of the NPS EN-1 states: <i>‘Development within a Heritage Coast (that is not also a National Park, The Broads or a National Landscape) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.’</i></p> <p>SCC considers that during construction the proposed development would not be compatible with the natural beauty and special character of the area between Aldeburgh and Thorpeness.</p>

No	Action Point	SCC Response
		<p>In its LIR [REP1-130] at para. 5.45, SCC stated that the construction activities were expected to be highly detracting the open coastal landscape.</p>
48.	<p>If you consider the development is not compatible with the special character of the Heritage Coast, explain why not and suggest whether this could be overcome by mitigation and if so, provide details of suggested mitigation.</p>	<p>Sea Link’s construction phase will introduce large construction vessels into Aldeburgh Bay, which are not congruent with the marine activities that usually can be observed from the coast and beach.</p> <p>SCC considers that this would affect the visual relationship with the coastline more than slightly (see paragraph 2.1.3, [APP-097]).</p> <p>Looking beyond the Thorpeness to Aldeburgh Character Area and at the wider Suffolk Heritage Coast, it is considered that Sea Link’s offshore construction activities further add to the adverse effects of the extensive offshore and marine construction activities of Sizewell C.</p> <p>‘SCC does not consider that the adverse effects on the natural beauty and character of the Suffolk Heritage Coast can be directly mitigated (i.e. minimised or reduced) if the project is to proceed. However, the mitigation hierarchy also embraces compensatory/offsetting where appropriate. SCC considers that the adverse effects on the Heritage Coast could be potentially offset or compensated for by measures to enhance other aspects of the Heritage Coast. Because of the close nexus between the Heritage Coast and the SECHNL, SCC considers that it would be appropriate for dialogue between the Applicant, SCC, and the SECHNL Partnership to take place to discuss the type and</p>

No	Action Point	SCC Response
		<p>extent of offsetting measures on the Heritage Coast that could be put in place.</p> <p>For instance, during construction, well-designed explanatory information boards could be provided in key locations, so that the public can understand what is happening and why. Further, off-setting measures that would contribute to enhancing the Heritage Coast in the local area for the longer term (for example contributing to addressing coastal erosion), should be considered.</p>
49.	<p>Having regard to paragraph 5.10.32 of the NPS EN-1 which sets out the exceptional circumstances in which the SoS may grant development consent in the AONB, can the relevant local authorities explain whether they think the circumstances are exceptional, and if not, why not?</p>	<p>SCC does not consider that, as currently formulated, the project has demonstrated the necessary exceptional circumstances.</p> <p>SCC accepts, in terms of siting, that the Order Limits of the proposed project must overlap with the designated boundary of the SECHNL. Alternatives routes, avoiding any landfall within the SECHNL would require onshore pylon routes which are likely to cause far greater environmental impacts to a disproportionate extent when compared to the subsea interconnector option.</p> <p>However, SCC does not consider that the proposed development, as currently formulated, adequately reflects the substantial weight which must be given by the SoS to the conservation and enhancement of natural beauty. SCC's previous submissions on the section 85 (A1) CROWA 2000 duty within paras 5.46 to 5.58 of its LIR [REP1-130], Table B3 of [REP2-062] and response to 1LVIA7 of ExQ1 [REP3-101] are</p>

No	Action Point	SCC Response
		<p>applicable here in terms of the project’s failure to conserve and enhance natural beauty despite measures being available.</p> <p>In that regard, SCC considers that there is an inevitable degree of overlap between the exceptional circumstances test in para 5.10.32 of EN-1 and the test in para 5.10.33 of showing that measures to further the statutory purposes of the designation (in this case the natural beauty of the SECHNL) are sufficient, appropriate, and proportionate. In short, if the proposed measures are insufficient to satisfy this test (and so the statutory duty) but it is realistic to expect more to be done, SCC considers it will be very difficult (or even impossible) to conclude that there are exceptional circumstances for allowing the development (in the form proposed and absent any further measures) in the SECHNL.</p> <p>These representations also show that bullet three of para 5.10.32, which reads: ‘any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.’ has not been adequately considered</p> <p>It is also noted that para 5.10.32 of EN-1 requires that ‘such development should be demonstrated to be in the public interest’. This should be understood not only in terms of the public interest at the national level but also at the local level. The project has identified residual significant effects and is likely to negatively affect the local community in other relevant and important ways such as in terms of mental and physical health and wellbeing, local accommodation</p>

No	Action Point	SCC Response
		<p>capacity, the prosperity of local businesses and the tourism industry, amongst others, within an intense cumulative context of the construction and operation of multiple other major infrastructure projects. At present, SCC considers, and has proposed, reasonable measures to better mitigate and, where not possible, offset, negative effects such as those identified here to better demonstrate that the proposed development is in the interest of the local community.</p> <p>Strong commitments around monitoring and adaptive management would ensure uncertainties of cumulative effects can be addressed once more is known during the construction phase, particularly in relation to health and wellbeing and socioeconomics and tourism effects due to limitations of current evidence regarding how these effects will actualise.</p> <p>There is also potential to look at expanded community benefits provision beyond the minimum set out in government guidance should the decision maker consider it appropriate. It should be noted that provision of community benefits would have to be written into the Order to be considered in this way.</p>
<b>Traffic and Transport</b>		
58.	Updates provided for junction modelling for both Kent and Suffolk (to include cumulative traffic), if the modelling is not fully submitted at DL4.	A1094/B1069, B1119 junction, Saxmundham crossroads, snape crossroads and Knodishall A1094/B1069 junction (check appendix A of [REP3-101])

No	Action Point	SCC Response
		<p>SCC has requested further meetings with the Applicant on highways on matters, including junction modelling</p> <p>Whilst comments were made on a without prejudice basis during the January 2026 meeting, SCC is awaiting minutes before confirming its position in writing</p>
62.	<p>Consider and discuss between County Councils and applicant whether information regarding predicted journey time analysis is required to be part of a robust traffic and transport assessment, including cumulative assessments.</p>	<p>SCC is open to discussions on highways matters with the Applicant.</p> <p>SCC considers that targeted predicted journey time analysis is required as part of a robust traffic and transport assessment to understand the cumulative impacts of the multiple NSIPs in the area on residents, the local economy and access to social infrastructure including local healthcare and emergency services.</p>
67.	<p>On proposed new accesses, the applicant has stated that road safety audits have been carried out to show that the proposed new accesses are feasible and can be safe. Provide comments on this and whether it is considered that further information on road safety audits or other forms of information and evidence is necessary for the proposed new accesses during the Examination stage?</p>	<p>RSAs have been completed and recommendations made by the auditors on some accesses but not all and would welcome discussion with the applicant with this in the near future. On access S-BM12 there are residual areas of outstanding disagreement where the Applicant does not agree with the safety auditors, but SCC does. For additional details please see Appendix A to this document created by SCC which details the status of the RSAs.</p>
<p><b>Water Environment</b></p>		

No	Action Point	SCC Response
81.	Set out all outstanding concerns regarding the adequacy of the DCO and outline management plans in relation to minimising the residual risk for surface water flooding and associated REAC commitments.	<p>The list of Works in the draft DCO list “drainage” for some works elements of the proposed development. It should list surface water drainage and foul water drainage as separate entities, as these will be discharge by different bodies.</p> <p>No outline management plans have been produced or secured in the DCO in relation to the Construction and Operational Drainage Management Plans set out in Requirement 6. The LLFA understands most relevant details are not yet available for the Construction Drainage Management Plan until contractors have been appointed. However, there should be robust commitments to include the required detail in the final approved Plan. The detail for the construction surface water management plan includes:</p> <ul style="list-style-type: none"> <li>• construction surface water drainage system design</li> <li>• construction management, maintenance and remediation schedules</li> <li>• required consents, e.g. Land Drainage Act, Environmental Permit</li> <li>• flood risk controls</li> <li>• pollution, water quality and emergency control measures</li> <li>• phasing plan (if required)</li> </ul>

No	Action Point	SCC Response
		<ul style="list-style-type: none"> <li>• construction site plan that includes compounds, material storage areas and temporary site parking</li> </ul> <p>Currently, the only control governing what is required to be in the Construction Drainage Management Plan is within commitment W17 of the REAC: <i>“The plan shall demonstrate how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated”</i>. The LLFA considers this insufficient meaning it is necessary for this commitment to be updated to ensure the required detail will be provided in the final Plan in lieu of an outline plan secured in the DCO. Moreover, an outline version of this plan is necessary to ensure the final approved plan accords with what has been presented as evidence of the approach to operational drainage in the examination.</p> <p>The submitted, unsecured outline management plans for surface water drainage allude to using a SuDS solution, but the LLFA feels that draft plans should be submitted prior to determination. This draft plan shall include the following information.</p> <ul style="list-style-type: none"> <li>• Preliminary Layout Drawings (including landscaping details) Indicative drawings of layout, properties, open space and drainage infrastructure including:</li> <li>• Existing watercourses to be retained within or abutting the site, 3.5m wide maintenance strip must be provided.</li> <li>• All existing blue corridors must be retained/enhanced.</li> </ul>

No	Action Point	SCC Response
		<ul style="list-style-type: none"> <li>• Cross section/plan views of basins; depicting area, side slopes, wet/dry benches, freeboard and volumes/depths (1:1, 1:30 and 1:100 + climate change allowance for all events).</li> <li>• Discharge location and invert of watercourse (outfall).</li> <li>• Form of SuDS and location on the site.</li> <li>• Main above ground conveyance network.</li> <li>• Maintenance strips/access points.</li> <li>• Legal easements/no planting zones.</li> <li>• Soakaway offsets.</li> <li>• Preliminary hydraulic calculations Greenfield discharge Rates (using suitable method i.e. FEH, IH124 (ICPSUDS), ReFH2. Long Term Storage (if using complex flow control). Source Control/Sketch Calculations (or similar).</li> </ul> <p><u>Pre-commencement Operations – temporary construction compounds</u></p> <p>The installation of temporary compounds may create areas of impermeable surfaces and thus will create surface water runoff which could lead to offsite flooding. It is therefore imperative that prior to the temporary compounds being permitted, a construction drainage management plan for these works shall be submitted for approval for the surface water drainage aspect to satisfy the LLFA on this matter.</p>

No	Action Point	SCC Response
		<p>SCC acknowledges that the pre-commencement activities must be carried out in accordance with the outline management plans. However, this is not sufficient for temporary construction compounds as they will create surface water runoff. Therefore, the LLFA will need to see and approve a detailed drainage strategy for any temporary construction compounds undertaken as a pre-commencement activity to ensure that surface water flood risk is minimised through an effective drainage strategy.</p> <p><u>Outstanding issues regarding the Flood Risk Assessment</u></p> <p>SCC LLFA, still request that the Applicant reviews the FRA and supplies a supplementary document for climate change maps for surface water flood risk. SCC recognises that the differences within this requested map may be minor in areas but to the extent that there are any differences, SCC considers this should be supplied to ensure the ExA, and in turn the decision maker, has full information on this matter. This is SCC's only outstanding concern regarding the FRA</p>
86.	Set out all remaining areas of disagreement regarding the applicant's approach to applying the sequential and exception tests.	<p>SCC would like to note that it is for the deciding authority to determine whether the application has met the Sequential and Exception tests. However, SCC sets out the remaining areas of disagreement regarding the Applicant's approach to applying the sequential and exception tests:</p>

No	Action Point	SCC Response
		<p>For temporary works, however, it is not clear to SCC that the sequential test has been passed. This applies to the Applicant’s comments on temporary storage of construction materials and temporary accesses. For the former, the Applicant states that it will ‘seek to seek to avoid storage of construction materials within Flood Zone 3 and areas of high and medium risk of flooding from surface water’ (para 3.2.13 of the FRA) as detailed in W06 of the CoCP. This fails to meet the sequential test as it has not been demonstrated that the location of these materials cannot be placed in areas of low surface water flood risk. The Applicant must commit to placing such materials in areas of low surface water flood risk in the absence of any demonstration that this is not feasible.</p> <p>Regarding temporary accesses, the Applicant says that “temporary access routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be suitably designed for flood resilience in accordance with any conditions of a Flood Risk Activity Permit and removed at the end of the construction phase, with the land re-instated.”</p> <p>However, a Flood Risk Activity Permit is not a mechanism whereby risk of surface water flooding is controlled. Therefore, committing to this permit does not allow for the sequential test to be passed in relation to surface water flooding were flood resilience through suitable design for temporary access routes considered necessary to pass, as appears to be implied by the Applicant.</p>

No	Action Point	SCC Response
		<p>For the exception test, whilst it is recognised that the “wider sustainability benefits” referenced in part a of para 5.8.11 of EN-1 include those fulfilled in the need case of the development, consideration should also be given to the benefits given to the local community who may experience increased flood risk. At present, SCC considers more could be done to fulfil this in line with its representations on the need for further mitigation and offsetting/compensatory measures. There is also potential to look at expanded community benefits provision beyond the minimum set out in government guidance should the decision maker consider it appropriate.</p> <p>No comments on part b of para 5.8.11</p>
88.	Confirm any outstanding concerns with respect to meeting the objectives of the WFD.	SCC has no comments to make on this matter
102.	District and County Councils to provide details as to what tourist accommodation may be available for tourists, taking into account Sea Link and other development workers who may be staying in such accommodation within the construction phases.	The accommodation sector in Suffolk obviously welcomes visitors all year round, but there is a high season in July/August where demand for accommodation is at its peak. Pontins in Pakefield has now closed to the public in order to accommodate the Sizewell C workforce, which will also be accommodated in purpose-built accommodation. It is important that the needs of the wider tourism economy are balanced against those of NSIP workforce who require accommodation. A breakdown of Suffolk accommodation spend can be found here.

No	Action Point	SCC Response
		<p><a href="https://www.visiteastofengland.com/wp-content/uploads/2025/08/Economic-Impact-of-Tourism-Suffolk-Report-2024.pdf">https://www.visiteastofengland.com/wp-content/uploads/2025/08/Economic-Impact-of-Tourism-Suffolk-Report-2024.pdf</a></p> <p>SCC understands that studies on this matter are to be published by ESC at Deadline 4 and/or later and considers that they will provide more robust evidence than that which SCC can currently provide.</p>
<b>Socioeconomics and Tourism</b>		
105	Provide a skills and employment plan, which shall include a local education/training strategy, or provide a timetable for its submission.	<p>Whilst not directed at SCC, SCC offers the following comments on what should be provided in this plan.</p> <p>SCC expects the Skills and Employment Plan (SEP) to provide clear and detailed workforce requirements for all phases of the project, including workforce numbers, skills, role durations, and the anticipated level of both home-based and non-home-based employment. This information is essential to enable SCC, in its role operating the Regional Skills Coordination Function (RSCF), to undertake coordinated workforce planning across Suffolk’s major projects and to manage cumulative pressures on the labour market. The SEP should set out how the Applicant will work with the RSCF to align training provision, address specific skills gaps, and contribute to a “right skills, right time” pipeline that maximises opportunities for local residents, supports project delivery, and contributes to long-term legacy skills development across the region.</p>

No	Action Point	SCC Response
		<p>A local education and training strategy should be developed jointly with the RSCF, demonstrating how the Applicant will engage effectively with FE, HE and private providers. This should include support for coordinated curriculum and programme planning and the development of inclusive pathways such as apprenticeships, Bootcamps and modular or short-course training. The Applicant is expected to explain how it will assist RSCF-led engagement with providers, reduce duplication of provision, and help create clear, accessible progression routes for local residents into project-related employment.</p> <p>The SEP should also describe how the Applicant will share information on supply-chain workforce requirements with the RSCF, enabling a coordinated approach to identifying skills gaps and strengthening local supply-chain capacity. This includes working with the RSCF and economic partners to ensure supply-chain businesses are aware of upcoming opportunities and can plan for training, recruitment and upskilling in a timely and efficient way.</p> <p>To support effective regional alignment, the SEP must set out how the Applicant will contribute to coordinated workforce planning across Suffolk’s NSIPs and other major developments, recognising that workforce demand and project timelines will evolve over time. This requires an adaptive management approach in which the Applicant commits to early, ongoing and iterative information-sharing on project timelines, workforce profiles and emerging skills needs. Such real-time</p>

No	Action Point	SCC Response
		<p>cooperation enables the RSCF to maintain accurate county-wide labour market intelligence, respond to changing conditions and manage potential competition for labour as circumstances shift. Alongside workforce considerations, the SEP should also support the monitoring of wider socio-economic effects, enabling SCC and the RSCF to track potential impacts on local services, business activity, housing and accommodation, access to education and training, and community wellbeing. Monitoring arrangements should be flexible and evidence-led, with indicators reviewed and adapted as required to ensure mitigation measures remain proportionate, effective and responsive to emerging issues, including those arising cumulatively across multiple NSIPs. The Applicant should commit to participating in joint monitoring and governance arrangements through existing structures, with performance measures for employment, training, supply-chain outcomes and wider socio-economic factors reviewed and refined as necessary to support continuous learning and adaptive management.</p>
<b>Draft Development Consent Order</b>		
114.	Consider and provide a response to the position that SPR do not have an equivalent to article 10 in their DCOs.	SCC understands that (2) and (3) of article 10 within Sea Link's draft Order may be sufficient to prevent enforcement action being taken against SPR in relation to any inconsistencies between SPR's authorised development and Sea Link's. However, SCC is in

No	Action Point	SCC Response
		conversation with the Applicant regarding the wording of article 10 to ensure it cannot be used as a vehicle to undermine the controls consented under the SPR Orders.
115.	All parties (applicant and councils) to meet/liase to agree suitable wording of article 10 which all parties are content with, with an update on progress and any agreement submitted.	SCC met with the Applicant to discuss this matter and agreed to liaise further with a view to provide suitable wording by Deadline 5.
<b>Design</b>		
131.	Suggest alternative wording for requirement 3 including which above ground elements of the proposed development should be included.	<p>SCC has liaised with the other host local authorities (Kent County Council, Thanet District Council and East Suffolk Council) to produce the following alternative wording for Requirement 3 based on discussions held:</p> <p>(1) No stage of development of the above ground elements of the authorised development comprised in Work No. 3B (Suffolk Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the design details and the Converter Station Design Principles found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design</p>

No	Action Point	SCC Response
		<p>Constraint. Work No. 3B must be carried out in accordance with the approved details.</p> <p>(2) No stage of Work No. 3A (Access road to the Suffolk Converter Station) may commence until details of the layout, scale and external appearance of the River Fromus Bridge have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the design details and the River Fromus Bridge Design Principles found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 3A must be carried out in accordance with the approved details.</p> <p>(3) No stage of development of the above ground elements of the authorised development comprised in Work No. 1B (new Substation at Grove Wood, Friston) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the design details and the Substation Design Principles found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 1B must be carried out in accordance with the approved details.</p>

No	Action Point	SCC Response
		<p>(4) No stage of development of the above ground elements of the authorised development comprised in Work No. 9B (Kent Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with the design details and the Converter Station Design Principles found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 9B must be carried out in accordance with the approved details.</p> <p>(5) No stage of development of the above ground elements of the authorised development comprised in Work No. 11 (new Kent Substation) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with the design details and the Substation Design Principles found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 11 must be carried out in accordance with the approved details.</p>

No	Action Point	SCC Response
		<p>(6) In this requirement, “the design details” means the Critical Design Constraints, Overarching Design Principles, and the Project Level Design Principles”.</p> <p><u>Explanatory text:</u></p> <p>It should be noted that this wording has been produced based on the current status of the application. As a result, the authorities propose for the Overarching and Project Level Design Principles to also serve as controls within the Requirement on account of the inadequacy of the current form of the Design Principles. As reflected in the proposed wording, the authorities do not take issue with the final designs being controlled by some form of Critical Design Constraints to ensure the functionality of the built infrastructure is not constrained by the design which the Applicant has cited as a key concern.</p> <p>The proposed wording refers to Key Design Principles for the River Fromus crossing. Such principles are not included in [APP-366]; however, SCC and ESC consider robust controls on the design processes and outcomes for the crossing to be necessary beyond what is included in the application based on representations made regarding the magnitude of residual adverse effects making outstanding design necessary.</p> <p>The proposed wording should not be interpreted as an endorsement of the current wording of the CDCs and design principles within [APP-366]</p>

No	Action Point	SCC Response
		<p>and [APP-367]. The authorities have detailed outstanding problems with these documents both during ISH2 and in written submissions. Should the wording of the Design Principles in these documents change, the Councils' view on appropriate wording for Requirement 3 may change. For instance, should the Key Design Principles become sufficiently robust, reference to the Overarching and Project Level Design Principles may become unnecessary. The authorities consider such an approach to be preferable to improve the precision of the requirement wording.</p> <p>Therefore, whilst the proposed wording does not resolve all outstanding matters relating to the design of the onshore infrastructure, it does secure a robust approval process for these designs which is a necessary step towards demonstrating application of the mitigation hierarchy and making the application acceptable in planning terms.</p> <p>In addition to rewording of the principles within [APP-366] and [APP-367], further work is needed to ensure a robust design process will be followed during the project's delivery. The design processes for the onshore infrastructure referenced in the proposed requirement wording must be embedded into the project's delivery programme to ensure optimal design outcomes are achieved as far as possible. The authorities consider that the Applicant should provide detail on how this will be carried out and secured at the next deadline.</p>

No	Action Point	SCC Response
		<p>Regarding the Kiln Lane substation (Work no. 1B), SCC and ESC consider that a rethink of the Applicant’s fundamental approach is appropriate in light of how the Applicant’s proposed Key Design Principles do not align with its justifications for them. During ISH2, the Applicant stated that much of the design process for this substation has been completed under the SPR DCOs rendering any further design process commitments unnecessary.</p> <p>The Councils acknowledge that duplication of work is unnecessary. However, if the Applicant wishes to take this approach, then it is necessary for the final design to, in turn, duplicate the final design produced under the SPR consents. If this were used as a starting point, the control for this design could, instead, set out procedures for deviation from that design in proportion to the magnitude of deviation. For instance, extremely minor deviations could be approved in a more proportionate way than more sizeable deviations which should follow the same process as that required and undertaken by SPR under their consents.</p> <p>At present, it is unacceptable for the Applicant to justify deviations from the SPR design principles for the substation on account of the work already completed by SPR without any commitment to using the end product of those processes. If the final substation design is not approved prior to the end of this examination, then some commitment for the final design to be produced in accordance with the progress made by SPR would be necessary to justify any deviation from those</p>

No	Action Point	SCC Response
		consented design principles (excluding those not applicable to Sea Link; namely, those specifying cable sealing end compounds).

Beltmouth ID	Access Point ID	Road Name	Parish	Eastings	Northings	Google Street View Image	Beltmouth Type (uni-directional, bi-directional or crossing)	Permanent or Temporary (as shown in 2.13 Design and Layout Plans)	Type of Access	Existing Public Highway Speed Limit (mph)	Stopping Sight Distance (SSD) Required (m)	Proposed visibility based on assumed Actual SSD	Nominal Road Width	Schedule 13 - TRD Restriction on Speed (mph)	Temporary reduced speed limit (to be confirmed) (mph)	Justification for SSD in drawings	Anticipated traffic management arrangements (for duration of construction phase)	Temporary traffic management arrangements (for installation of beltmouth)	RSA Recommendation	Vegetation	Drainage History	CrashMap Data	SCC Comments
SBM1	S-AP-2	Leiston Road	Aldeburgh	64564.489	258379.918	<a href="https://maps.app.goo.gl/138k9P4u2F7mms1">https://maps.app.goo.gl/138k9P4u2F7mms1</a>	Northbound access only (except Cable AT deliveries from the north)	Temporary	LGV and HGV	40	120	120m (North)   120m (South)	5.9m	30	30	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary alternate or full lane closure with traffic signals or diversion respectfully	OH, undergrounding, prohibition of overtaking	None	No reported drainage issues	No recorded incidents 2020-2025	
SBM2	S-AP-3	Leiston Road	Aldeburgh	64556.488	258376.481	<a href="https://maps.app.goo.gl/7m3e8PMu1C2m6">https://maps.app.goo.gl/7m3e8PMu1C2m6</a>	Northbound access only (except Cable AT deliveries from the north)	Temporary	LGV and HGV	40	120	90m (North)   70m (South)	5.9m	30	30	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary alternate or full lane closure with traffic signals or diversion respectfully	Vegetation management, prohibition of overtaking	Large conifer trees, various hedging	No reported drainage issues	No recorded incidents 2020-2025	
S-BM3 - Main HGV Access (as stated in OCTMP 6.2.1)	S-AP-5	Snapo Rd (B1069)	Friston	642492.18	259936.747	<a href="https://maps.app.goo.gl/1116v42u3d8d8m1">https://maps.app.goo.gl/1116v42u3d8d8m1</a>	Bi-directional	Temporary	LGV and HGV	NL	215	215m (North)   120m (South)	5.8m	40	40	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary alternate or full lane closure with traffic signals or diversion respectfully	Vegetation management, OH, undergrounding	Low field boundary hedging	No reported drainage issues	No recorded incidents 2020-2025	
S-BM4 - Main HGV Access (as stated in OCTMP 6.2.1)	S-AP-6	Snapo Rd (B1069)	Friston	642487.675	259943.932	<a href="https://maps.app.goo.gl/10bwp427m3p27m1">https://maps.app.goo.gl/10bwp427m3p27m1</a>	Bi-directional	Temporary	LGV and HGV (Possibly all types of vehicles)	NL	215	215m (North)   190m (South)	5.8m	40	40	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary alternate or full lane closure with traffic signals or diversion respectfully	Vegetation management, OH, undergrounding	Low field boundary hedging	No reported drainage issues	No recorded incidents 2020-2025	
SBM5	S-AP-8	Grove Rd	Knodihull	641866.497	261434.254	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Crossing (bi-directional for emergencies)	Temporary	LGV and HGV	NL	215	90m (North)   75m (South)	4m	30	30	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary full lane closure with suitable diversion	Vegetation management	Tall field boundary hedging, trees	No reported drainage issues	No recorded incidents 2020-2025	
SBM6	S-AP-9	Grove Rd	Knodihull	641878.335	261431.458	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Crossing (bi-directional for emergencies)	Temporary	LGV and HGV	NL	215	90m (North)   80m (South)	4m	30	30	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Temporary full lane closure with suitable diversion	Vegetation management	1no. Tree	No reported drainage issues	No recorded incidents 2020-2025	
SBM7	S-AP-12	B1121	Friston	640150.214	261135.263	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	Permanent	LGV and HGV	NL	215	120m (North)   120m (South)	5.1m	40	40	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Carriageway narrowing, with temporary traffic signals	Vegetation management, OH, undergrounding	Medium height field boundary hedging	No reported drainage issues	No recorded incidents 2020-2025	Noted that the visibility for a permanent access is based on a temporary speed limit. If the junction is designed for a set speed it must be based on the permanent situation including level of completion.
S-BM9 (Removed from state of work)																							
S-BM9 - Main HGV Access (as stated in OCTMP 6.2.1)	S-AP-14	B1121	Benhall	638571.288	262118.832	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Northbound access only (bi-directional for emergencies)	Permanent	All types of vehicles	NL	215	215m (North)   120m (South)	5.9m	40	40	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Carriageway narrowing, with temporary traffic signals	Vegetation management, speed limit extension	Low to medium height field boundary hedging	No reported drainage issues	1 reported incident approx. 250m north of access - slight collision in 2024 involving 2 vehicles	Noted that the visibility for a permanent access is based on a temporary speed limit. If the junction is designed for a set speed it must be based on the permanent situation including level of completion.
SBM10	S-AP-4	A1094	Friston	52.17361239	1.55833056	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	?	LGV and HGV	NL	215	?	6.8m	Unchanged	?	?	?	?	RSA not undertaken	Low height field boundary hedging	No reported drainage issues	1 reported incident - slight collision in 2022 involving 2 vehicles	
SBM11	S-AP-3	B1121	Friston	52.19914174	1.508188472	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Northbound access only (bi-directional for emergencies)	?	LGV and HGV	NL	215	?	5.6m	Unchanged	?	?	?	?	RSA not undertaken	Medium height field boundary hedging, 1no. large tree	No reported drainage issues	1 reported incident - slight collision in 2020 involving 1 vehicle	
SBM12	S-AP-13	B1129 (Church Hill)	Saxmundham	52.2153994	1.50039076	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Eastbound access only (bi-directional for emergencies)	Temporary	LGV and HGV	30	90	120m (North)   120m (South)	5.8m	Unchanged	30	?	?	?	RSA undertaken, SCC diagnosis with 3 of the responses from the Design Organisation, specifically regarding conflicts between construction traffic and HMA's, and risk of verge / footway encroachment.	Various hedging to the west	Issue raised in 2024, no information available but SCC spoke to the customer and resolved the issue.	1 reported incident approx. 150m east of access - slight collision in 2022 involving 2 vehicles	
SBM13	S-AP-1	Thorpe Road	Aldeburgh	52.16801975	1.607829969	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Northbound access only (bi-directional for emergencies)	?	LGV and emergency vehicles	NL	215	?	4.1m	Unchanged	?	?	?	?	RSA not undertaken	None	No reported drainage issues	No recorded incidents 2020-2025	Looks to be adjacent to parking area, how will this be affected? Not an existing access
SBM14	S-AP-5	B1119	Saxmundham	640200.838	262704.222	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	Permanent	LGV and emergency vehicles	NL	215	160m (East)   120m (West)	5.6m	Unchanged	60	Based on the speed limit and Table 2.10 in CD 109 and the 80th percent measured speeds data (DMRB)	Priority control (construction traffic to give way)	Carriageway narrowing and contra-flow working, with temporary traffic signals	Vegetation clearance, hazard/marker posts to be retained and suitable alternative provided if retention is not possible	Medium height field boundary hedging to the south	75m north of access is a drainage issue on SCC's long list. Report suggests flooding occurs in field and not on the carriageway, good ditch requires cleaning	No recorded incidents 2020-2025	
SBM15	S-AP-4	B1119	Sternfield	640410.028	262492.08	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	Permanent	LGV and emergency vehicles	NL	215	160m (East)   160m (West)	4.7m	Unchanged	60	Based on the speed limit and Table 2.10 in CD 109 and the 80th percent measured speeds data (DMRB)	Priority control (construction traffic to give way)	Carriageway narrowing and contra-flow working, with temporary traffic signals	Vegetation management	None	No reported drainage issues	No recorded incidents 2020-2025	
SBM16	S-AP-1	A1094	Friston	643418.808	258749.014	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	Temporary	LGV and emergency vehicles	NL	215	215m (East)   215m (West)	6.8m	Unchanged	60	Based on the temporary reduced speed limit and Table 2.10 in CD 109 (DMRB)	Priority control (construction traffic to give way)	Carriageway narrowing and contra-flow working, with temporary traffic signals	Vegetation management	Low height field boundary hedging, 1no. Tree	No reported drainage issues	1 reported incident - slight collision in 2022 involving 2 vehicles	
S-AP-1	Grove Road	Friston	52.18998813	1.53172252	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	?	LGV and emergency vehicles	NL	215	?	3.8m	30	30	?	?	?	?	RSA not undertaken	Medium height hedging	No reported drainage issues	No recorded incidents 2020-2025	
S-AP-2	B1119	Sternfield	52.20764311	1.518991452	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Westbound access only (bi-directional for emergencies)	?	LGV and emergency vehicles	NL	215	?	4.9m	Unchanged	?	?	?	?	?	RSA not undertaken	None	No reported drainage issues	No recorded incidents 2020-2025	
S-AP-7	School Road	Knodihull	52.19750617	1.55140477	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Southbound access only (bi-directional for emergencies)	?	LGV and emergency vehicles	NL	215	?	4.7m	30	30	?	?	?	?	RSA not undertaken	Large field boundary hedging and trees	One report of flooding from fields in 2018, closed as not intervention level by the inspector. No further reports.	No recorded incidents 2020-2025	
S-AP-10	B1121	Friston	52.19239363	1.520958778	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Bi-directional	?	LGV and emergency vehicles	NL	215	?	5.6m	Unchanged	?	?	?	?	?	RSA not undertaken	Medium height field boundary hedging	Flooding reports in 2019, 2020 and 2021 outside Friston House (approx. 150m east of access). Ditch notice sent to landowner in 2021	No recorded incidents 2020-2025	
S-AP-11	Elin Lane	Friston	52.19387905	1.505409151	<a href="https://maps.app.goo.gl/1242d3u3f31M027">https://maps.app.goo.gl/1242d3u3f31M027</a>	Westbound access only (bi-directional for emergencies)	?	LGV and emergency vehicles	NL	215	?	3.5m	Unchanged	?	?	?	?	?	RSA not undertaken	Several large trees in vicinity	No reported drainage issues	No recorded incidents 2020-2025	