

SEA LINK

EN020026

Comments on Submissions received by Deadline 3

Suffolk County Council



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Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>LLFA</i>	<i>Local Lead Flood Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</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 response to submissions received by the Examining Authority (ExA) at Deadline 3. Examination library references are used throughout this document to assist readers.

Comments on further information/submissions received by Deadline 3

Ref. No	Topic	Summary of submission	SCC Response
Table A1 – Document 9.73: Applicant’s Responses to First Written Questions [REP3-069]			
1GEN28	Article 11(2), 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) wording	The Applicant notes that a very similar point was raised by Suffolk County Council in its LIR. The Applicant therefore refers to Response 15.13, Table 13.1 of Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].	SCC maintains its position in respect of these provisions, the latest version of which is set out in its reply to 1GEN28 in its Deadline 3 submission <i>Answers to Examining Authority Questions Round 1 [REP3-101]</i> .
1GEN29	Article 11, article 14, article 15 and article 17 consistency of wording	The Applicant will amend the wording in article 14(5), article 15(9) and article 17(2) to read ‘beginning with the date on which the application was received’ in order to ensure consistency across the draft Order. This reflects the position agreed in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.	SCC welcomes this amendment.
1GEN47	Requirement 3 converter station design	Converter station design The layout and scale of a converter station facility (which includes a DC hall, valve hall,	SCC has put forth alternative wording for Requirement 3 in response to Action Point 131 of ISH 2.

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		<p>reactor hall, converter transformers, AC switchyard, various other buildings and equipment, car parking and other elements) must be designed to meet the functionality of the converter station in line with National Grid specifications and requirements. The equipment selection and layout will be heavily driven by engineering, safety, security, and other operational factors, as well as regulatory considerations and delivery programme considerations (e.g. product availability).</p> <p>This is reflected in Application document 7.12.1 Design Principles – Suffolk [App366] and Application document 7.12.2 Design Principles – Kent [App-367], which presents a hierarchy whereby a series of ‘Critical Design Constraints’ (CDCs) sit above the Design Principles that they influence.</p> <p>Whether or not the planning authority are afforded the ability to control layout, scale, and design, the actual ability of a planning authority to influence these elements is limited, due to the overriding engineering and operational</p>	<p>As stated in ISH 2, SCC, along with ESC, has extensive experience in discharging requirements of DCOs for NSIPs including those relating to design. The most relevant example of this experience lies in SCC’s involvement in SPR’s design process for its approved substations which SCC considers encapsulating several elements of best practice both in the wording of the DCO and control documents and how these have been actioned post-consent in relation to Requirement 12 of the EA1N and EA2 DCOs. It is due to experience such as this that SCC has been able to have an informed opinion allowing it to recognise the comparative inadequacy of the Applicant’s respective DCO proposal in terms of the comparatively worse outcomes which will likely arise during delivery in terms of quality of design and engagement.</p> <p>SCC has no reason to seek to make the design of the relevant onshore infrastructure to be of such a kind that the functionality of the infrastructure is compromised as this would obviously be unacceptable to the Applicant.</p> <p>SCC understands that the Applicant does not want to be forced into a scenario post-consent whereby it is forced to design its onshore infrastructure in such a way which</p>

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		<p>factors captured in the CDCs summarised above. Including the ability for the planning authorities to control these elements in requirement 3 may risk creating an unrealistic expectation around design flexibility (beyond what the Key Design Principles would already deliver) and create unnecessary delays to delivery as any areas of discussion were resolved. It is not considered that introducing a procedural step which affords planning authorities the ability to control layout, scale, and design would be appropriate, or indeed productive for either the Applicant or the planning authorities in this context.</p> <p>The Key Design Principles, set out in Application document 7.12.1 Design Principles – Suffolk [App-366] and secured via Requirement 3 of Application document 3.1 (E) draft Development Consent Order [CR1-027], have been designed specifically to ensure that matters of design (including height, scale, massing, orientation, building arrangement, materials, colours, and textures) are</p>	<p>compromises their function. However, SCC does not see why the Applicant has not taken the option of ensuring such a scenario would be excluded by the wording of the DCO as opposed to rejecting any form of approval process. As directly referenced by the Applicant, its Design Principles documents [APP-366] and [APP-367] refer to a hierarchy of principles of which Critical Design Constraints (CDCs) are first and foremost which would have to be reflected in the approval process for the design of the onshore infrastructure, as indicated by SCC at ISH2, precluding a withholding of consent for reasons which are inconsistent with the CDCs would be a suitable mechanism to safeguard the Applicant’s functional requirements.</p> <p>For these reasons, SCC considers that the Applicant’s fears that an approval process would “create an unrealistic expectation around design flexibility (beyond what the Key Design Principles would already deliver) and create unnecessary delays to delivery as any areas of discussion were resolved” are unfounded. The Applicant has not provided any evidence to base its view upon and has not cited evidence to the contrary such as the approach taken by SPR for EA1N and EA2 where unrealistic expectations around design flexibility has not arisen as an issue on</p>

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		<p>considered appropriately and robustly, recognising that the manner and extent to which principles can influence the design are dependent on the engineering and operational factors above.</p> <p>The relevant planning authorities do have the ability to approve (or otherwise) the designs on the basis of their general accord with the Key Design Principles. Aspects of design that could lead to significant environmental effects, such as matters related to noise and landscaping, are separately controlled through commitments and/ or through the discharge of management plans as secured via Requirement 6 of Application document 3.1 (E) draft Development Consent Order [CR1-027]. This ensures that where controls are necessary, they are secured and approved by the relevant planning authority.</p> <p>The Design Principles documents have been developed following extensive community and stakeholder engagement, including with the relevant local planning authorities and with a</p>	<p>account of the proactive and collaborative approach SPR has taken with relevant stakeholders and local authorities to ensure mutual understanding of the limits of design flexibility.</p> <p>As stated in SCC's comments on the Applicant's response to 1GEN49, concerns around delays to the project caused by an approval process for Requirement 3 can be alleviated through early proactive engagement with the relevant authorities. Based on the information available, SCC does not see how the implementation of best practice in relation to gaining design approval could not succeed in preventing delay as a result.</p> <p>In the context of policy, there are significant residual landscape and visual effects identified as a result of these pieces of onshore infrastructure in relation to which the Applicant, at present, refuses to implement a measure that would provide greater certainty that the residual effect will be minimised to the extent that this can be achieved through design.</p> <p>SCC has provided its detailed position on the necessity of an approval process for the River Fromus bridge, Saxmundham converter station and Kiln Lane substation in its previous representations, most notably in its own</p>

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		<p>Design Review Panel (DRP). The Design Principles documents also set out a series of Project Level Design Principles which (although not secured via requirement) include a commitment to maintain ongoing engagement with the relevant planning authorities and the DRP in advance of submitting material to discharge DCO Requirement 3. In this regard, while not being asked to control the design, the relevant planning authorities will be a key stakeholder as the design is developed.</p> <p>It is also relevant that the physical parameters are already controlled by the lines and situations on Application document 2.5.1 (B) Works Plans – Suffolk [CR1 -007] and Application document 2.5.2 (B) Works Plans – Kent [CR1 -008], and the table of parameters in article 5 of Application document 3.1 (E) draft Development Consent Order [CR1 -027].</p> <p>Wording that stipulates that the authorised development must be carried out in accordance with the details submitted to the relevant planning authority has been added to</p>	<p>response to 1GEN47 in [REP3-101]. There, SCC also details the benefits from having an approval process for these designs.</p> <p>For the Secretary of State’s purposes, the heart of the matter is that an approval process provides the decision maker with greater confidence around the post-consent detailed design stage and that best design will be sought, in the face of the levels of residual effects and the large degree of flexibility sought by the Applicant at consenting stage.</p>

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		<p>Requirement 3 in Application document 3.1 (E) draft Development Consent Order [CR1 -027].</p> <p>Substations, watercourse crossings, and pylon tower design</p> <p>The design of the substations is controlled by commitments in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3 (the 'REAC') (e.g. GG34 and GG36), which require works to be in general accordance with the Key Design Principles relevant to the substations in Application document 7.12.1 Design Principles – Suffolk [App -366] and Application document 7.12.2 Design Principles – Kent [App -367].</p> <p>Similarly, the appearance of the crossing of the River Fromus is controlled via commitments in the REAC (e.g. ID LV14). This requires that design measures are incorporated into the Fromus crossing, and that details are submitted to the relevant planning authority to demonstrate how impacts have been reduced</p>	

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		<p>through consideration of landscape, the use of materials, and other architectural measures.</p> <p>The Applicant will continue to discuss the appropriate control mechanisms related to the design and appearance of the River Fromus crossing with the relevant local authorities as discussions progress and Statements of Common Ground are developed. The Applicant is cognisant of the difference between the design of the bridge compared to the design of the converter stations/ substations in terms of the flexibility of design, site context and experience of the relevant planning and highway authorities on design. Adherence to the measures set out in the REAC is secured via Requirement 6.</p> <p>As with the converter station design however, the designs of the substations and the Fromus crossing must conform to the CDCs set out in the Application document 7.12.1 Design Principles – Suffolk [App -366].</p> <p>Generally, it is noted that requiring details of the scale, layout, and design of utilitarian</p>	

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		<p>infrastructure such as substations to be approved by the relevant planning authority is not a consistently applied requirement in energy DCOs. While recognising that this is required by the East Anglia ONE North and TWO DCOs, there is for example no equivalent requirement related to the substation element of the National Grid (Bramford to Twinstead Reinforcement) Order 2024, a recent DCO secured by the Applicant in Suffolk.</p>	
1GEN49.	Requirement 7 construction hours	<p>Context</p> <p>The ability to deliver a network reinforcement that is operational by 2030 is a fundamental element of the case for the Proposed Project. Delivering the Proposed Project by 2031 is a requirement of the Applicant’s transmission licence (special conditions 3.41 and 4.9), with an accelerated Earliest in Service Date (EISD) target of 2030, to meet the need for the Proposed Project. The Proposed Project is also identified in the National Electricity System Operator (NESO) Clean Power 2030 report as</p>	<p>SCC recognises what is said in the Clean Power 2030 report including the need to accelerate Sea Link to energisation by 2030.</p> <p>SCC understands that in the Applicant’s Transmission Licence, Special Conditions 3.41 and 4.9, together with their respective Appendix 1 specify a delivery date of December 2031 for the Sea Link project but also that there is a process open to the Applicant under s11A of the Electricity Act 1989 to seek modifications to any of its licence conditions. Any made DCO for the Sea Link project would have the force of secondary legislation as a statutory instrument and if the Requirements of that DCO, as</p>

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		<p>being critical for the achievement of the Clean Power 2030 target. This report states that of eighty transmission projects required,</p> <p>“three projects have been identified as critical to delivering a network which supports the clean power pathways. At present, these three projects have delivery dates after 2030 and support is, therefore, needed to bring these projects forward for 2030 delivery” (NESO, 2026). One of these projects is Sea Link (the other two comprising the two elements of Norwich to Tilbury). The report identifies that without the Proposed Project, consumers could face an extra £1.1bn to £1.4bn in constraints costs in 2030, £3m to £3.8m for every additional day required due to constrained working hours, added to consumers’ bills.</p> <p>This is further evidence of the great importance of facilitating the timely delivery of the Proposed Project. The importance of programme in the delivery of network reinforcements is explicitly referenced in policy, for example the Overarching National Policy Statement (NPS)</p>	<p>determined by the Secretary of State, imposed timetable restrictions on the Applicant which meant that it could not achieve the delivery date in its transmission licence, it would be open to the Applicant to apply to modify the conditions and, if such modification was justified by the need to comply the terms of the DCO, it is hard to see why NESO would not approve such a modification.</p> <p>SCC would also like to note that Table 4.10 of the project’s description [REP1A-003] appears to be based on an outdated scenario of DCO consent by Q2 2026 when current statutory timelines require the Secretary of State’s decision to be made by November 2026. Given this discrepancy, in addition to the Applicant’s reference to programme modelling and the fact that the Applicant has already tendered certain major contractors, the Applicant should provide a more accurate indicative construction programme which includes detail specifying the anticipated energisation date.</p> <p>Setting aside the question of the feasibility of energisation by 2030, SCC does not consider that the Applicant has adequately demonstrated the necessity of its proposed core working hours to achieve acceleration as this requires</p>

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		<p>for Energy (EN-1), which states at paragraph 3.3.65, that “there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives”. The need to accelerate is similarly reflected in policy, for example the National Policy Statement (NPS) for Electricity Networks (EN-5), which states at paragraph 1.1.4 that plans for network expansion “...must overcome barriers to deliver on time, and some vital projects need to be accelerated to delivery by 2030”. It is therefore clear that the facilitating the delivery of the Proposed Project against its required programme is paramount to the achievement of the Applicant’s licence obligations, to the delivery of the NESO clean power objectives, to accord with NPS policy, and to avoid substantial constraints costs being passed to bill paying consumers.</p> <p>Core working hours</p> <p>The core construction working hours proposed are inherent to the Applicant’s ability to meet the needs case for the Proposed Project. The</p>	<p>showing that all other avenues to accelerate the programme have been exhausted.</p> <p>The Applicant does not appear to have commented on such avenues which are likely to accelerate the Applicant’s programme in SCC’s view. For instance, the Applicant could pursue submissions of draft discharge of requirement documents to the relevant local authorities during the post-examination phase whilst awaiting a decision. SCC recognises that this would be at risk due to the potential for changes to the DCO to be made by the Secretary of State; however, such an approach would ensure any substantive issues the local authority has with the draft submissions are resolved in advance, meaning once the DCO is made, the discharge of requirement process can be as timely as feasible. Tendering of contractors and resourcing of the delivery team could be accelerated and increased respectively should there be barriers to such an approach.</p> <p>As stated in ISH2, SCC will work collaboratively in the Applicant to facilitate delivery of its project and so would be open to conversations about approving works outside of the core working hours, where the effects of such works would be minor or immaterial to accelerate the programme. Such</p>

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		<p>Applicant requires a consent that does not unduly restrict the ability of its main works contractors to plan, programme, and deliver the works in an efficient and timely manner. This includes the ability to operate using the ‘12 days working, 2 days off’ pattern that is conventional of a workforce on large infrastructure projects such as that proposed. The main works contractors would develop a detailed programme on this basis, reflecting a final design which will influence what activities are undertaken when.</p> <p>While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. It should also be noted that the ability to make efficient progress in a half day is limited.</p> <p>However, given the need to allow contractors to programme and phase their works without delaying time critical elements of the Proposed</p>	<p>requests may be in the interests of the relevant local authority and the community, should the timing of works outside of core working hours reduce negative impacts by, say, reducing the overall duration of the works in question or by avoiding more impactful timings.</p> <p>Similarly, high-quality project management and phasing of the delivery programme can accelerate delivery which can be implemented through adequate resourcing of project management skills and capacity.</p> <p>Moreover, SCC’s experience of NSIP delivery is that recurring sources of delay come from substandard submissions to discharge requirements and internally from operating practices of promoters and their contractors, such as on account of adjustments to the phasing of works or other changes to delivery. Early tendering and engagement with contractors can mitigate the potential for these delays by allowing work on their final programme to begin as early as possible. To the extent that the avoidance of delays such as these will be in the Applicant’s control (which will be to a substantial extent aside from unforeseeable scenarios which could not have reasonably been prepared for), it should not fall on local communities to bear unnecessary adverse impacts of, amongst other</p>

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		<p>Project, the Applicant cannot currently be specific as to which days will be worked. This recognises that the delivery of the Proposed Project will involve multiple different main works contractors, each working on different parts of the project, in different complex and varied geographies (sometimes large distances apart), at different times. It also recognises that there are further benefits of being able to be flexible with programming of activities, including coordinating with other developers managing peaks, and reducing or carefully programming interactions with (for example) PROWs. Flexibility is therefore required to facilitate the effective planning and management of a construction project of this type.</p> <p>In addition to the need to accommodate and work with main works contractors in the way described above, the proposed working hours are needed to provide the necessary contingency to mitigate and manage unforeseen delays and currently uncertain</p>	<p>things, extended working hours. If the same outcome of acceleration can be achieved through high quality best practice delivery by the Applicant without extended working hours, there is no reasonable case to be made that extended working hours are necessary.</p> <p>In any case, SCC considers that more detailed and up-to-date information regarding the Applicant's anticipated construction programme should be submitted to the examination to better evaluate the feasibility of energisation by 2030.</p> <p>(SCC has also commented on this matter during day 3 of ISH2 with a written summary submitted at Deadline 4)</p>

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		<p>constraints and otherwise keeping delivery workstreams off the critical path. It is noteworthy that recent National Grid Electricity Transmission DCO projects (Bramford to Twinstead in Suffolk, the Richborough Connection Project in Kent, as well as Yorkshire Green), were all granted weekend and bank holiday working.</p> <p>Delivery programme prolongation</p> <p>The Applicant has considered the scenario suggested in the ExA's question, being the loss of the flexibility to work after 13:00 on a Saturday and the loss working hours on a Sunday and Bank Holidays. The Applicant's modelling is naturally a high-level review that does not take into account the potential impact of seasonal constraints (such as restrictions on working around ecological features), unforeseen circumstances and delays, or the potential for the altered working hours to impact on critical path activities, but this modelling indicates that the scenario in the</p>	

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		<p>ExA's Question would result in a delay of between 21 and 33 weeks.</p> <p>Given the NESO forecast of constraint costs outlined above, if working hours were restricted as described this could mean an additional cost would be borne by British energy bill payers of between £443m and £886m.</p> <p>Construction impacts Notwithstanding the need to work full weekends and bank holidays as necessary, there are measures within the application which protect the amenity of local communities and avoid unacceptable disturbance.</p> <p>The Applicant notes in particular the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS127], Application Document 9.84 Register of Environmental Actions and Commitments (REAC), and Application Document 9.83 Outline Code of Construction Practice. The Applicant has also specifically accepted some exceptions to the general construction hours, including in relation to percussive piling works,</p>	

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		<p>and proposing more restrictive days/hours for Work No.1A and Work No. 1B. The Applicant has also accepted restrictions on HGV movements. It is also the case that a substantial amount of construction activity will be indoors, once the superstructures of the converter station buildings (for example the valve halls and DC halls) have been completed.</p> <p>The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified in relation to these working hours following the application of appropriate mitigation.</p> <p>Summary</p> <p>The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power</p>	

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		<p>objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The ability to programme construction activity as necessary (although unlikely to be continuously) on weekends and bank holidays is vital to facilitating this.</p> <p>Notwithstanding this, it is considered that the construction impacts are suitably controlled and that working on weekends and bank holidays will not result in unacceptable disturbance on communities in any case. It is therefore considered that the proposed core working hours are reasonable and indeed necessary.</p>	
1GEN50	Requirement 7 construction hours	The Applicant will amend the wording of Requirement 7(2) at Schedule 3 to the Draft Development Consent Order to read: Percussive piling works are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays, unless otherwise approved by the relevant planning authority	SCC Public Health welcomes the clarification that piling works are precluded on Sundays (unless otherwise approved by the relevant planning authority) but maintains its position that the hours proposed (<i>Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays</i>), are not satisfactory, as regards Saturdays, where the Applicant intends to allow for both early morning piling (0700-0800) and afternoon piling (1300-

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			<p>1700) when local residents might reasonably expect respite from such intrusive activities in those parts of their weekends. Leaving only one day a week (Sundays) when residents might expect to enjoy a piling free ‘lie in’ or to enjoy afternoons in their homes, gardens or other amenity spaces in a piling free environment, is an unreasonable curtailment of their domestic amenities and basic quality of life.</p> <p>SCC would suggest that these hours should be precluded for piling activity on Saturdays (save for an express approval from the relevant planning authority, which would allow flexibility where there was a genuine need for such activity to take place during those hours.</p>
1GEN52	Requirement 9 reinstatement schemes	The presence of an underground cable affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural	Please see agenda item 21.4 (Schedule 3 Requirement 9(2) “reinstatement schemes”) of SCC’s Deadline 4 response <i>Post-Hearing Submission for Issue Specific Hearing 2</i> .

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		<p>structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables.</p> <p>Therefore, a blanket requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables. However, there are requirements and commitments that do apply to this land and Requirement 9 does not disapply these commitments.</p> <p>Examples of such requirements, as set out in Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043], includes B13 which requires that hedgerow gaps be replanted and AS02 which commits to restoring agricultural land, with the aim being to restore to its original ALC grade. The draft DCO has also been updated at Deadline 3 to make it clear that hedgerows will be reinstated over cable corridors to ensure there is no doubt over this point.</p>	

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		The above commitments provide confidence in the assessment of significant effects as set out in the Environmental Statement. As a result, there are no significant environmental effects that would result due to the exclusion of this land from the reinstatement commitment in Requirement 9.	
1LVIA1	Landscape Vision	Is there a clear vision for the landscape design of the project?	SCC has commented on the schemes landscape vision in [REP3-101] and provides further comments in its post hearing submission to ISH 2.
1LVIA6	Adaptive monitoring	How will LV03 and LV04 of the REAC [CR01-043] interact with the oLEMP.	SCC considers that adaptive management must also include a time extension element for the aftercare and establishment, management and monitoring period to achieve growth equivalent to five years and well-established reinstatement planting prior to handover.
1LVIA9	Effects of construction on defined features of the NL	<p>Additional information on Natural Beauty Indicators and their Sub-Factors</p> <p><i>Intactness of the landscape in visual, functional and ecological perspectives</i></p> <p>The temporarily affected areas of acid grassland would therefore be within a</p>	<i>Intactness of the landscape in visual, functional and ecological perspectives</i>

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		<p>landscape context where the juxtaposition and intactness of elements would remain during both the construction and operational (and maintenance) phases.</p> <p><i>The condition of the landscape's features and elements</i></p> <p>For the duration of the enhancement there would be a net increase in good quality acid grassland including potentially improved botanical diversity, reduction in invasive species presence, improve habitat structure for</p>	<p>SCC considers that intactness refers to the whole landscape and not to elements that stay intact during construction.</p> <p>Further, it is not only the ecological, but also the visual intactness that is affected by the proposals.</p> <p>SCC considers that, given the visual disruption during construction and the required time to achieve reinstatement of the acid grassland, the magnitude of the effect is medium, rather than small, as stated by the Applicant.</p> <p><i>The condition of the landscape's features and elements</i></p> <p>As above, it is about the landscape as a whole. While SCC welcomes the additional acid grassland, the proposed duration of the enhancement of 10 years is considered too limited, given the time it takes to re-establish acid grassland.</p> <p><i>The influence of incongruous features or elements (whether man-made or natural) on the perceived natural beauty of the area</i></p> <p>Please see D3 comments [REP3-122].</p> <p><i>A distinctive sense of place</i></p>

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		<p>wildlife such as reptiles, invertebrates and birds.</p> <p><i>A distinctive sense of place</i></p> <p>The temporary impact of habitats within the construction period would not influence the juxtaposition of the semi-natural, cultural and built heritage features therefore retaining the distinctive sense of place.</p> <p><i>Striking landform</i></p> <p>The striking landform and the strong sense of scale and contrast exemplified by the sea cliffs and shingle beaches contrasting with the flat and gently rolling heaths and farmlands would not be affected by the construction or operational (and maintenance) phases of the Proposed Project,...</p> <p><i>Visual interest in patterns of land cover</i></p>	<p>SCC agrees that the distinctive sense of place would remain, however during construction it is likely to be disrupted.</p> <p><i>Striking landform</i></p> <p>SCC accepts the Applicant's assessment.</p> <p><i>Visual interest in patterns of land cover</i></p> <p>SCC accepts the Applicant's assessment.</p> <p><i>Appeal to the senses</i></p>

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		<p>The visual interest in patterns of land cover would therefore remain during both the construction and operational (and maintenance) phases of the Suffolk Onshore Scheme. The perception of landscape change due to cable routeing through the SECHAONB would be minimised due to the layered vegetation pattern.</p> <p>Appeal to the senses</p> <p>The aesthetic experience of the interrelationship of constituent features resulting in a juxtaposition of colour and texture is unlikely to be affected by the construction plant and activity as the shingle beach and adjacent heathland would not be impacted due to the trenchless construction technique.</p> <p>A sense of remoteness and A relative lack of human influence</p> <p>Construction vehicles would temporarily increase traffic on existing routes, and the construction of the Proposed Project would temporarily introduce elements of uncharacteristic machinery and noise into the</p>	<p>SCC disagrees with the Applicant and considers that the appeal to the senses would be temporarily disrupted, where construction activity is visible.</p> <p>A sense of remoteness and A relative lack of human influence</p> <p>SCC considers that during construction these aspects would be eroded/disrupted, where the construction activities are visible.</p>

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		<p>SECHAONB and its setting. This would have a temporary and localised influence on the relatively undeveloped character of the Suffolk coast, albeit within the immediate context of Leiston Road (B1122), Aldeburgh golf course and residential areas on the edge of Aldeburgh. These areas are not associated with the parts of the SECHAONB which are perceived as being distant from significant habitation.</p> <p><i>A sense of openness and exposure</i></p> <p>The big ‘Suffolk Skies’ and expansive views offshore would remain unaffected due to the trenchless construction across the exposed coastline and adjacent heath. The sense of openness and exposure would not therefore be affected by the Proposed Development.</p> <p><i>A sense of enclosure and isolation</i></p> <p>... the removal of small sections of boundary features along the HVDC cable corridor would not affect the mixture of enclosure and isolation present within the SECHAONB.</p>	<p><i>A sense of openness and exposure</i></p> <p>SCC disagrees with the Applicant’s position and considers that the near-shore construction vessels would affect the expansive views offshore during construction, as these vessels are incongruent with the character of the Heritage Coast and the local setting of the National Landscape.</p> <p><i>A sense of enclosure and isolation</i></p> <p>SCC considers that this sub-factor would be affected in localised areas where construction activities are seen (isolation) and where vegetation is permanently lost above cables (enclosure).</p> <p><i>A sense of the passing of time and a return to nature</i></p>

Ref. No	Topic	Summary of submission	SCC Response
		<p><i>A sense of the passing of time and a return to nature</i></p> <p>The land temporarily affected by the landfall works and HVDC cable laying within the SECHAONB would be in close proximity to the edge of Aldeburgh and golf course. It therefore, would have a very limited influence on the areas of the SECHAONB where there is little evidence of apparent human activity. At operation (and maintenance), the presence of maintenance vehicles would not be dissimilar to the present vehicle activity in this part of the SECHAONB therefore not influencing the sense of the passing of time and a return to nature.</p> <p><i>Contributors and detractors from tranquillity</i></p> <p>Construction activity would be ‘within the context of human activity associated with the adjacent residential areas on the edge of Aldeburgh, Leiston Road (B1122) and the golf course which would lessen the influence on the perception of tranquillity.’</p>	<p>SCC considers that time-depth is lost, where construction activity is visible or otherwise perceived.</p> <p><i>Contributors and detractors from tranquillity</i></p> <p>SCC agrees with the Applicant that there is the context of human activity associated with residential areas, the golf club and the B1122. However, the nature of the human activity associated with the proposed construction works is different from the contextual activities and is expected to erode the relative tranquillity during construction. It should further be noted that the residential areas and the golf club are also receptors of relative tranquillity, which will be adversely affected during construction.</p>

Ref. No	Topic	Summary of submission	SCC Response
		<p>Geological and geo-morphological features</p> <p>The Proposed Project would not affect the geological or geo-morphological features that contribute to a sense of place and other aspects of scenic quality within the SECHAONB at any of the project stages.</p> <p>Wildlife and habitats</p> <p>The construction of the Proposed Project would include the temporary removal of small sections of boundary vegetation and 7.61 ha of acid grassland which would be temporarily affected by the landfall compound and HVDC cable corridor, noting that only 0.3 ha of this is priority habitat acid grassland.</p>	<p>Geological and geo-morphological features</p> <p>SCC accepts the Applicant’s position.</p> <p>Wildlife and habitats</p> <p>SCC considers that the removal of hedgerows could result in (temporary) disruption to the connectivity of habitats. Not all affected hedgerows appear to have been mapped to date.</p> <p>Cultural Heritage</p> <p>SCC defers comments regarding Cultural Heritage to the district authority and the Suffolk and Essex Coast and Heaths National Landscape Partnership.</p> <p><u>SCC’s conclusion:</u></p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>With regards to Landscape Quality, SCC considers that the Applicant underestimates the construction impacts and effects.</p> <p>The same applies to the Scenic Quality, despite landform and patterns of landform remaining largely unharmed. SCC considers that the Appeal to the Senses will be affected during construction to a greater extent than assessed by the Applicant.</p> <p>With regards to Relative Wildness and Relative Tranquillity, SCC agrees with the Applicant to an extent that the golf club, residential areas and the B1122 are not in themselves wild or remote. They are, however, set within an area that is perceived as relatively remote, wild and tranquil. SCC considers that this perception is being disrupted during construction, and that the magnitude is greater than that assessed.</p> <p>The Applicant has taken steps to minimise the loss of mature, and especially veteran trees, which form an important element within Natural Heritage Features. The approach to hedges is less convincing and SCC considers that all hedges need to be assessed and clearly presented on plans (distinguishing important from non-important</p>

Ref. No	Topic	Summary of submission	SCC Response
			hedgerows as per 1997 regulations) and ultimately reinstated.
1LVIA12	Visualisations	Winter Year 15 Visualisation for Viewpoint 8 (a) - Public Bridleway (Friston 260, route 2), East of Friston, Looking Northwest	SCC considers that this visualisation demonstrates the insufficiency of the mitigative planting proposals for Friston under Scenario 2, as there is no discernible difference between year 1 and year 15 (both are winter visualisations, and it is noted that the foreground hedge and its potential to mature has not been considered).
1LVIA14	Landscape and visual effects of new access from the B1121	The Applicant provides a response to SCC comments at deadline 2 Ref A1.2 in relation to the need for a more thorough assessment of the effect of a new bell mouth construction and road from the B1121 to the proposed converter station, including the need for appropriate visibility splays along the B1121 to be provided, and the implications for the existing roadside hedge.	SCC considers that the potential urbanising effect of constructing a new bell mouth and access road from the B1121 across the River Fromus, south of Saxmundham, has not been fully assessed in Table 3.1 of [APP-097] or the viewpoint assessment pages for VP2 and VP20 in [APP-098].
1LVIA15	Appendix D 1LVIA15 Coordination with Friston Substation Landscape	The Applicant provides a response to SCC's comment at deadline 2 Ref A2.1 in relation to the need for HDD to connect to the substation to avoid undermining SPR mitigation planting.	SPR are seeking to respond thoughtfully to opportunities to improve their scheme for the benefit of the community, and this approach is welcome as is the specific measure of the northern woodland planting.

Ref. No	Topic	Summary of submission	SCC Response
	Mitigation Technical Note [REP3-070]		<p>Given National Grid's publicly stated cooperate commitments to both Biodiversity and Communities, the SCC considers it deeply disappointing that they are not able to welcome this additional planting scheme.</p> <p>The Sea Link proposals as the stand would result in rendering woodland planting impossible within their cable corrido, which would be considerable proportion of the proposed woodland, and would most likely undermine its effectiveness. SCC therefore considers that HDD would be beneficial as well as necessary in this area.</p> <p>It is disappointing that rather than exploring solutions, the option of HDD is dismissed without establishing whether it would be possible/feasible at the location.</p> <p>Even when considering the potential challenges of HDD of HVAC cables, as laid out within the Technical Note, SCC disagrees with the Applicant that the benefits of using HDD for HVDC cables are so limited they cannot be justified. Looking at the Masterplan as shown on Plate D-1, the areas of the SPR proposals affected by Sea Link could be greatly reduced.</p> <p>At location A the connectivity to the field boundary hedge would be maintained. At location B substantially more of the woodland belt could be planted and retained. At</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>location C the integrity of the proposed field boundary tree line would not need to be compromised.</p> <p>Since the northern woodland is yet to be planted, it could also be explored, whether the cables in this location could be laid using open trench methods, but to a depth, and maybe with additional protection, that would enable woodland planting over the top. A combination of additional depth and raised landform could also be considered for both types of cable.</p> <p>SCC notes the following statement in the Technical Note at D.10.4:</p> <p><i>‘This Technical Note also provides a proposed coordinated masterplan for the site that would deliver additional planting compared to the SPR OLEMS and a landscape masterplan that is very similar the recent SPR proposal with the Sea Link cables in place and installed using an open cut solution.’</i></p> <p>This masterplan does not appear to show contribution from Sea Link beyond undermining SPR’s current proposals, without offering or exploring a suitable alternative or compromise.</p>

Ref. No	Topic	Summary of submission	SCC Response
1TT1	Peak construction times	The Applicant details the likelihood of the peaks of cumulative projects overlapping with Sea Link's	<p>The Applicant refers 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.</p> <p>Moreover, if the Applicant considers its peak overlapping with multiple projects unlikely and so not requiring mitigation, then it should decide on a more realistic worst case scenario to assess. The worst case scenario is intended to provide an envelope such that effects will be no worse than assessed. The Applicant's approach relies on its proposed worst case scenario failing to actualise. The issue with this approach is that the envelope no longer ensures effects are at acceptable levels were the peaks of all projects to fully overlap. In turn, there is not an envelope ensuring effects are acceptable should substantial overlap of traffic occur outside the respective peaks of cumulative projects which is a much more likely scenario. In addition, consideration of substantial, yet below-peak, construction traffic overlap from multiple projects may surpass effects assessed for the coincident of individual peaks with Sea Link.</p> <p>Therefore, SCC considers the failure to secure the desired envelope may lead to residual significant effects</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>where the potential for such effects have been dismissed by the Applicant on account of full overlap of peaks being unlikely, especially when considering increased duration of effect for high levels of traffic outside of absolute peak numbers as well as overlap of multiple projects outside of peak traffic numbers.</p> <p>SCC is also concerned with the duration of impact caused by prolonged overlap of various projects with Sea Link, particularly for Sizewell C which will also have substantial traffic outside of the peak numbers for a prolonged period.</p> <p>It is also essential for the most up to date data to be used in the Applicant’s assessment. 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"> • SPR EA2 CTMP for the substation which includes the revised program, HGV movements and workforce for that project • Quarterly Transport Reports and Traffic Surveys relating to SZC

Ref. No	Topic	Summary of submission	SCC Response
			<ul style="list-style-type: none"> • Greater details on program, HGV movements and workforce from the Sealink project • Information within the Lionlink statutory consultation. <p>In SCCs view this should allow the programs for each project to be 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 CTMTP indicates a construction period from early 2027 to 2032 which overlaps with:</p> <ul style="list-style-type: none"> • SPR EA2 completing end 2028 (from its CTMP) • SZC completing 2036 (Implementation Plan Nov 2025) • LionLink commencing 2028 and operational by 2032 (Statutory Consultation Jan 2026) • Suffolk Water Pipeline commencing 2030 and completing 2032 (Consultation Dec 2025) • A12 MRN scheme commencing 2027 and completing late 2028

Ref. No	Topic	Summary of submission	SCC Response
1TT2	Benhall railway bridge - minor work	The Applicant explains why the repairs to the Benhall Bridge can be done in 28 days	<p>SCC notes that the main concerns raised by the Applicant regarding the Benhall Rail Bridge here relate to failure of drainage or waterproofing together with concerns regarding corrosion of the deck beams SCC agrees further investigation is necessary and is working with the applicant to agree the parameters of this. However, 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>
1TT7	Layby facilities	The Applicant stands by its position of no significant effects on the highway	<p>Layby facilities for welfare breaks, and for commercial drivers generally, are already beyond capacity with complaints being made over the lack of welfare facilities. This is both in SRN, MRN and local road network particularly in East Suffolk.</p> <p>SCC has had complaints from people about anti-social lorry parking due to the lack of availability of layby facilities which undermines the Applicant's position and warrants the inclusion of improved measures to prevent this resulting from its vehicles.</p>

Ref. No	Topic	Summary of submission	SCC Response
			Mere encouragement is not sufficient as this won't guarantee any measurable outcome difference.
1TT16	Public right of way (PRoW) – mitigation/ compensation	<p>The Applicant considers the committed mitigation proposed within Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1- 047] and Application Document 9.83 Register of Environmental Actions and Commitments (REAC), submitted at Deadline 3, to be sufficient for mitigating the potential impacts of the Proposed Project on Public Rights of Way (PRoW), from a Traffic and Transport perspective. The Proposed Project is not expected to result in the potential for any significant effects on the PRoW network based on this mitigation, as set out within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054].</p> <p>Nonetheless, the Applicant has reviewed Suffolk County Council's request for additional enhancements where this is not already proposed, to determine whether this is reasonable/necessary to help further mitigate</p>	<p>The Applicant justifies no further mitigation/PRoW enhancement due to lack of justification for CA of land. SCC does not agree that the acquisition of land or rights for PRoW enhancements could not satisfy the CA tests in sections 122 PA 2008.</p> <p>First, the Applicant itself has identified that there are significant residual intra project effects on parts of the PRoW network for which the Applicant proposes no mitigation (see [APP-059]). Even if the Applicant were correct to suggest that only what it describes as 'essential mitigation' (by which it appears to mean mitigation directed as addressing a likely significant effect, as suggested in paras 3.2.1 and 3.2.2 of its Approach to Assessment of PRoW [REP1-119]) could be the subject of CA (a suggestion not accepted by SCC as explained below), there would be a justification for providing mitigation (or offsetting) for that significant effect.</p> <p>Second, SCC does not accept that the Applicant's categorisation of other effects on the PRoW network as not significant is justified, for the reasons explained in its LIR (paras 11.207-11.212, paras 11.232-11.249). SCC</p>

Ref. No	Topic	Summary of submission	SCC Response
		<p>any potentially significant effects as a result of the Proposed Project. With respect to PRow, these initial suggestions comprise the creation of a bridleway to provide an on-road route along the B1119 for non-motorised users and a PRow along the haul road across the river Fromus, and Sluice Cottage to the old railway line. Each of these suggested improvements involve the provision of a new route that will deliver a community benefit/ enhancement to the PRow network during the operational phase, rather than essential mitigation to address any potentially significant effects identified in the ES. These suggested enhancements are therefore not necessary to compensate or mitigate potential impacts of the Proposed Project. PRow enhancements that go beyond essential mitigation cannot be included as part of the Proposed Project because compulsory acquisition powers cannot be taken over land that is not essential for mitigation. Such powers are not therefore sought as part of the DCO.</p>	<p>considers that the Applicant has not adequately assessed the potential for significant effects because of the shortcomings in its ‘compartmentalisation’ approach to impacts on the PRow network.</p> <p>Third, SCC does not consider that mitigation (or offsetting) is required, by either policy or law, to be limited only to addressing significant effects in EIA terms. SCC notes that para 4.1.5 of EN-1 expects that the Secretary of State will take into account all potential benefits and all potential adverse impacts, and in neither case is this limited to only ‘significant’ benefits or adverse impacts. Nor does EN-1 limit it reference in para 4.1.7 to mitigating impacts as far as possible only to ‘significant’ impacts. Where adverse impacts can be reduced by applying the mitigation hierarchy to a level that leaves the effects as not significant, those effects are still an impact, and if it is possible to minimise them further, there is no sound planning reason why such opportunities should not be taken before the residual effects (after mitigation) are then weighed against the benefits.</p> <p>It can also be noted that the Applicant has not applied a ‘significance’ threshold to its identification of the benefits of the project in Planning Statement [AS-058] (section 5.3</p>

Ref. No	Topic	Summary of submission	SCC Response
		<p>In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. Community benefit funding could be used to contribute towards the PRow infrastructure improvements identified by SCC, if these are considered to be preferential to other suggested/potential improvements in the area</p>	<p>and all of those benefits are then relied on in paras 9.2.22 to 9.2.31 of the Planning Statement). It would be a lop-sided exercise to weigh all of the benefits in a planning balance but only have regard to ‘significant’ adverse effects to set against those benefits. Whilst SCC would accept that policy in EN-1 does not require an applicant to mitigate non-significant effects (but nor does it preclude that course being undertaken by an applicant), if an applicant chooses not to address such effects, then it is incumbent on that applicant to include all such residual effects in a planning balance exercise. However, that is not the approach taken by the Applicant in this case as regards PRow, where only what the Applicant regards as significant effects on the PRow network have been brought into account (para 9.2.54 of the Planning Statement).</p> <p>In addition, an approach which only brought into account ‘significant’ effects would leave out of account any other benefits or adverse impacts that are required to be considered in order to determine whether section 104(7) PA 2008 should be applied. The balancing required by section 104(7) PA 2008 is not limited only to a consideration of ‘significant’ effects. SCC considers that CA can be justified to secure any mitigation measure (including offsetting)</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>which it is concluded is necessary to make the development acceptable in planning terms (having regard to the relevant NPS and all other important and relevant considerations). It is a matter for the decision maker’s planning judgment whether particular measures are necessary to make the development acceptable in planning terms and there is no principle in either policy or law that only measures addressing ‘significant’ impacts are necessary to make a development acceptable. In the specific case of the residual impacts on the PRoW network, SCC considers that the enhancement measures it has suggested are necessary to offset those impacts and that they would meet this test (but as noted below it would be content to discuss other enhancement measures with the Applicant that may achieve the same overall objective of offsetting the residual impacts of the project on the PRoW network). If the decision maker shares that view there would be no impediment to the exercise of CA powers to secure the land and rights required to deliver those measures.</p> <p>Moreover, this point does not preclude the Applicant from seeking to gain voluntary agreements for the provision of such routes.</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>SCC stands by the point that PRow enhancements are ‘essential’ mitigations. Particularly for the proposed NMU route along the B1119 to mitigate effects for PRow users in relation to the permanent diversion route caused by the converter station site.</p> <p>Residual effects mean it is required for offsetting measures to be sought. If the Applicant does not accept SCC’s proposals, SCC would like to see what alternatives have been considered by the Applicant.</p> <p>SCC is willing to discuss its enhancement proposals, and whether there are more appropriate alternative offsetting measures, with the Applicant</p>
1TT17	Coordination of PRow closures and diversions	The Applicant is committed to on-going engagement with other projects including EA1N / EA2 to identify potential opportunities for co-ordination during project delivery and to minimise potential impacts on Public Rights of Way (PRow), and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. Further details of this engagement and any additional mitigation to minimise the potential or duration of any potential significant cumulative effects	The wording of GG32 of the REAC goes further than merely imply that “The Applicant is committed to on-going engagement with other projects including EA1N / EA2 to identify potential opportunities for co-ordination during project delivery and to minimise potential impacts on Public Rights of Way (PRow),”. It implies that the Applicant <i>will</i> coordinate with SPR to reduce significant cumulative effects. The ExA has asked about the delivery of this commitment and the Applicant has now indicated that ‘a firm commitment cannot be made’ for any joint

Ref. No	Topic	Summary of submission	SCC Response
		<p>on PRow will be documented and secured as part of the Suffolk Public Rights of Way Management Plan (PRowMP) through Requirement 6 of Schedule 3 of Application Document 3.1 (F) draft Development Consent Order, submitted at Deadline 3.</p> <p>No single party has authority over another and each DCO only controls the activities for that project. For these reasons, a firm commitment cannot be made to prepare or agree a Joint Suffolk PRowMP with Scottish Power Renewables (SPR) for example. Therefore, it is the Applicant's intention to develop the Suffolk PRowMP for the Proposed Project post-consent, once the Proposed Project is developed during detailed design and further details are known for EA1N / EA2 e.g. project timeframes and potential impacts/ mitigation on any shared PRow receptors. The Applicant will consult SPR as part of this process, so that any potential cumulative impacts on PRow can be identified and minimised such as by</p>	<p>public rights of way management plan with the promoters of other projects. The Applicant is right to say that such coordination is not guaranteed as it relies on the agreement of another party and their associated interests in delivering their own projects. This is exactly the reason SCC considers GG32 unacceptable to secure either minimising the Applicant's contribution to significant effects or mitigating the effect to the level of non-significance, contrary to Advice Note 17. The Applicant has not proposed any revised wording for GG32. SCC considers that (as a minimum) the Applicant should commit to engaging with the promoter(s) of EA1N and EA2 and commit to using its best endeavours achieve co-ordination of PRow closures/diversions.</p> <p>Other mitigation measures should also be sought to minimise these effects. SCC has suggested ways in which this can be achieved in its comments on the Outline PRowMP such as in Chapter 11 of the LIR [REP1-130] and in [REP2-062], including a commitment to keeping PRow open by implementing crossings where necessary. If no direct mitigation is feasible, offsetting measures must be explored as required by EN-1, including its reference to the mitigation hierarchy.</p>

Ref. No	Topic	Summary of submission	SCC Response
		coordinating works to minimise the number or duration of any PRow closures and diversions.	
1SERT7.	Employment and skills plans	<p>The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment.</p>	<p>SCC’s position remains as set out in our Comments on any further information/submissions received by Deadline 1 and Deadline 1A (REP2-062). The points we raised there continue to stand, and our concerns remain unresolved. We therefore have nothing further to add at this stage but would encourage the Applicant to reassess its position in line with SCC’s Energy and Climate Adaptive Infrastructure Policy – Supplementary Guidance and the evidence presented.</p> <p>SCC also notes the Applicant’s reference to the need for its proposals to be “economic and efficient” for consumers. SCC does not consider that the preparation of a Skills & Employment Plan conflicts with this requirement; indeed, SCC has already set out in the Supplementary Guidance that structured skills planning in the form of a SEP would support economic and efficient delivery by:</p> <ul style="list-style-type: none"> • reducing labour-market uncertainty; • supporting a more resilient local and regional skills pipeline;

Ref. No	Topic	Summary of submission	SCC Response
			<ul style="list-style-type: none"> • helping minimise displacement, wage inflation and recruitment delays; and • reducing reliance on non-home-based labour, thereby improving deliverability and lowering risk. <p>These outcomes are all consistent with the Applicant’s statutory duties under the Electricity Act and Ofgem’s regulatory expectations. As such, SCC maintains that a proportionate, locally-aligned Skills & Employment Plan remains both necessary and reasonable.</p>
101.	Material and Waste Management Plan	The general approach of the Applicant has been to submit outline management plans only where the mitigation measures within those plans are relied on to mitigate potentially significant effects from the Proposed Development. That allows the proposed content of the plan to be scrutinised through the Examination. The Applicant has not submitted outlines of plans where the mitigation is not specifically required to address potentially significant effects. The detail of these plans would be submitted to the planning authority for approval post-consent. The Applicant considers that this is a standard approach for	<p>SCC has set out concerns Minerals and Waste concerns in its LIR [REP1-130] which is reflected in table 3.13 of its draft Statement of Common Ground [REP3-062]. SCC considers that an outline Materials and Waste Management Plan would ensure these concerns, particularly in relation to the reuse of minerals, can be addressed. Whilst SCC recognises that the Applicant has existing commitments relating to the waste hierarchy, an outline plan would enable SCC to see how the Applicant intends to implement this and how it would be controlled in more detail which is not provided by existing documents.</p> <p>This detail is required because the amount of the waste from construction and demolition could be</p>

Ref. No	Topic	Summary of submission	SCC Response
		<p>projects of this nature. The need for a Material and Waste Management Plan is secured by requirement 6(1)(n) and is already included in the draft DCO.</p>	<p>substantial. Would for example their work on the Benhall Bridge involve removal of the disused asbestos water main? Where would the Waste Electrical Equipment in the form of cable offcuts go. Aggregate from temporary haul road for cabling works could amount to hundreds of thousands of tonnes and should be recycled. For this reason, SCC considers the Applicant's justification given in this response, which says outline plans are only required where significant effects are identified, should be rejected.</p> <p>Moreover, it would provide an opportunity for SCC and other IPs to comment on this during the examination which serves as the consultation period for this application. SCC notes that an outline Materials and Waste Management Plan was produced for the Bramford to Twinstead DCO</p>

Ref. No	Topic	Document Ref(s)
Table A2 – Document 9.17.1: Suffolk Drainage Strategy		
Run off Destination	National Standards for SuDS	The applicant has not clearly demonstrated to the LLFA satisfaction that they have followed the National Standards for SuDs relating to run off destinations – Standard 1: Run Off Destinations, water reuse. The LLFA will need a statement showing that they have considered water using for other the construction, operational and decommission element of the proposed development.
6.6 Proposed Drainage Features	Basin design	The applicant is proposing SuDs basins, but the proposed side slopes (1 in 3) are not to the LLFA SuDs Guidance. ¹ Sides slopes should not exceed 1 in 4 unless specific site/safety/maintenance arrangements allow for steeper slopes (C753 p.490 & 651). Applicant should submit typical cross section of any proposed SuDS features to the LLFA SuDs Guidance for our approval as part of the examination process.
7.3 Permanent Foul Water	Discharge	If the applicant cannot connect to the public foul sewer and a package treatment work is required, any discharge to a watercourse must be controlled, so that any discharge, including surface water runoff, does not exceed Q _{bar} combined, i.e. greenfield run off rate .

¹ [\(2023\) SF3967 - SCC Suffolk Flood Risk Appendix A](#)

Ref. No	Topic	Summary of submission	SCC Response
Table A3 – Document 9.7 (D) Applicant's Schedule of Changes to the Draft Development Consent Order [REP3-056] SCC Archaeological Service comments:			
34.	Schedule 3 Requirement 14	Update to archaeology requirement 14	<p>SCCAS are generally satisfied with the updates made to Requirement 14 (Archaeology) and the wording is now mostly in line with that suggested as appropriate in the SCC LIR.</p> <p>SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works.</p> <p>As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: ‘All archaeological works must be carried out in accordance with the approved site-</p>

			specific written scheme of investigation for that stage, <i>prior to the commencement of any pre-commencement or construction works in that stage</i> ’.	
	Part 4 Supplemental Powers (23)	Removal of human remains	No revisions have yet been made to the clause relating to human remains and in line with comments set out in the SCC LIR, to ensure that this clause does not cause issues in archaeological human remains being able to be appropriately dealt with, SCCAS would advise the need for part 12 to be updated to make clear that archaeological human remains believed to be over 100 years old should be treated in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents. This is to avoid human remains potentially being exposed for an extended period and at a risk from damage or harm.	
SCC’s Comments on the Applicant’s Schedule of Changes [REP3-057]				
The Applicant’s deadline 3 submission, <i>Applicant’s Schedule of Changes to the Draft Development Consent Order [REP3-057]</i> , includes, at Table 3.3, the Schedule of Changes to Version F of the draft DCO for Deadline 3.				
SCC makes the following comments in respect of the changes to the items given references 6, 25, 28, and 29.				
Ref.	dDCO ref	Rationale for change	Change made	SCC’s comments
6.	Art.2 (interpretation)	The Applicant has updated the definition of maintain as per the	“maintain” includes inspect, repair, adjust, alter, dismantle, remove, clear, refurbish, paint,	While the amendment is welcome, the amended definition of “maintain” still

		<p>response to question 1GEN15 of the Examining Authority’s First Written Questions to make the clear that the definition of maintain does not permit the whole of the authorised development to be reconstructed or replaced using maintenance powers.</p>	<p>surface treat, decommission, improve, reconstruct or replace any or-all part, <u>but not remove, reconstruct or replace the whole</u> of the authorised project including through the use of robots, helicopters, drones, gadgets or similar devices either remote controlled or autonomous, provided such works do not give rise to any materially new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of “maintain” must be construed accordingly;</p>	<p>includes the power to replace any part of the authorised project. Depending on the replacement undertaken, such development is still likely to be significant.</p> <p>Article 4(2) (maintenance of authorised project) provides the (wide) power to maintain conferred under article 4(1) does not relieve the undertaker of any requirement to obtain any further licence under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009 for offshore works not covered by the deemed marine licence.</p> <p>Absent article 4(2), it is unclear what controls apply to the maintenance works. Owing to their potentially wide-ranging nature, SCC requests that the Applicant directs SCC to the relevant document which deals with the control of maintenance works.</p>
25.	Schedule 3, Requirement 3 (Converter	The Applicant has included a new paragraph (2) to provide a definition	3. (1) No stage of development of the above ground elements of the authorised development comprised in	Column 10.1 (Adequacy of design controls including in relation to converter stations, substations,

	Station Design)	<p>of the Converter Station Design Principles and reference to Schedule 19. This reflects comments made by Suffolk County Council in its LIR. Further to comments made by Historic England, the Applicant has also added a provision for Historic England to be consulted in relation to the Kent Converter Station given the reference to heritage key views in the Key Design Principles. The updated requirement also seeks to clarify that the authorised development will be carried out in accordance with the details submitted to the relevant planning authority.</p>	<p>Works Nos. 3B and 9B (Suffolk and Kent converter stations) may commence until details of the layout, scale and external appearance have been submitted to the relevant planning authority, and the relevant planning authority has confirmed, in consultation with the relevant county council <u>and Historic England in relation to the Kent converter station only</u>, that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles as resented in Document 7.12.1 Design Principles – Suffolk and Document 7.12.2 Design Principles – Kent.</p> <p><u>(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60 (certification of documents) by the Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order.</u></p>	<p>pylons, lighting) of SCC’s Deadline 3 <i>Post-Hearing Submission for Issue Specific Hearing 2</i> (which accompanies this submission) summarises its concerns with design controls and provides alternative wording.</p>
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			<p><u>(3) The authorised development must be carried out in accordance with the details submitted to the relevant planning authority further to subparagraph (1).</u></p>	
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Ref. No	Topic	SCC Response
Table A4 – Document 9.84: Register of Environmental Actions and Commitments (REAC) [REP3-078]		
LV01	Landscape and Visual	The CTMP should also include measures to minimise vegetation loss, in particular for temporary works, such as temporary accesses, visibility splays, haul roads and works compounds. For example, through traffic management measures or reduced widths.
LV13	Landscape and Visual Suffolk Onshore	Some of the measures listed here as principles, could restrict further development of the landscape proposals.
LV14	Landscape and Visual Suffolk Onshore	The recessive design commitment should not preclude innovative and artistic design of the parapets.
A02	Arboriculture	The risk to life as well of property of all users of the site should be included here.
B20	Ecology and Biodiversity	The habitat creation should be a ‘no less than’ commitment rather than an exact commitment.

Ref. No	SCC Response
Table A5 – Document 9.40: Visitor and Tourism Assessment Technical Note [REP3-065]	
3.1-3.4	<p>As per previous submissions, there is still concern that the cumulative effect of Sealink, LionLink, Sizewell C, Norwich to Tilbury and other NSIPs will have a detrimental effect on aspects of the visitor economy.</p> <p>There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C.</p> <p>At the time of writing, 2000 workers are already onsite for Sizewell alone. Whilst there are some short-term benefits to be made for the accommodation sector and wider visitor economy, we need to ensure that we have a viable tourism economy once all NSIPs are complete. The sector has expressed concerns and the need to ensure that Suffolk still has a tourism economy which is attractive and accessible to visitors.</p> <p>Given the number of projects taking place over a relatively short period of time, it is inevitable that there will be some crossover, and it is important that the effects of all of them are taken into consideration. It would therefore be very difficult to consider them in isolation. One NSIP alone is likely to have some impact, to a greater to lesser degree. Multiple projects will definitely have a significant impact</p> <p>We need to consider the practical aspects of how the construction phase would impact the visitor experience in a number of areas.</p> <p>Perception- Is Suffolk likely to be viewed as a viable place for a short break or holiday? Word of mouth, particularly in an age of TripAdvisor and/or social media, can quickly lead to negative experiences and perceptions becoming widespread. Excess traffic and diversions create bad first impressions on arrival. Add to this excess noise, road closures, visual blight during construction phase and afterwards) etc and Suffolk could acquire an image which would be problematic. This in turn has the potential to lead to people holidaying elsewhere or at the very least not returning in the short to medium term.</p>

Ref. No	SCC Response
	<p>Practical effect on tourism businesses- Roadworks, delays, road closures etc all pose issues for businesses. The visitor economy relies on shift workers as well as prompt deliveries of fresh food and other supplies. If these need to be accommodated, then they need to be planned for and mitigation measures need to be put in place to ensure that these can be overcome.</p> <p>Timescale. Whilst Suffolk welcomes visitors all- year round and is a popular out of season weekend and short break location, there is clearly a traditional "high season" of July- early September where visitor numbers are at their peak. Whilst we strive to have good public transport links, we need to acknowledge that the bulk of visitors will travel by car and so traffic will be heavier during the peak period. There needs to be a balance struck between accommodating visitors, while acknowledging the practical benefits of a construction project taking place when the weather is good.</p> <p>Marketing and publicity - If NSIPs are likely to happen, then there needs to be adequate notice given and the operators need to work with the sector to ensure that the messages convey the fact that Suffolk is still open for business and welcoming visitors. Sizewell C has a tourism mitigation fund, which is working with the sector to convey such messages. As part of this work, it is carrying out perception studies and collating baseline data on visitor numbers, spend etc across the district, in order to measure the effects on individual businesses, towns and the county as a whole. Organisations such as the Suffolk Coast Destination Management Organisation (DMO) and the Suffolk and Norfolk Local Visitor Economy Partnership (LVEP) will be useful sources of support and information.</p> <p>On a wider economic point, we also need to consider where the workforce and materials will be drawn from for this and other NSIP initiatives. Again, coming back to the point about the cumulative effect, we need to be mindful of how SeaLink will work alongside the other projects.</p> <p>While we would obviously want to see the economic benefits for the Suffolk economy (and an appropriate sourcing tool might be something like the Suffolk Supply Chain) we need to ensure that we are able to provide the labour and materials when required. If done effectively, then it will be a welcome boost for Suffolk businesses and employment figures. If</p>

Ref. No	SCC Response
	materials and workforce are to be transported into Suffolk, then we need to return to the point about additional traffic on the county's roads and pressure on bedspaces. Whilst we welcome the economic and practical benefits of the SeaLink scheme, we need to ensure that any potential disbenefits are considered and effectively mitigated against.

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
Table A9 – Document 9.36: Applicant’s Comments on the Suffolk County Council Deadline 2 Submission [REP3-064]				
Public Rights of Way (Item 2.10)				
A6.1	Public Rights of Way – Lack of Respite for PRoW users RR 21-RR 99	The Applicant’s response in this regard states no more than three HGV movements per hour, not considered to be perceptible, and therefore does not suggest clustering of HGV movements. It is reiterated that these flows are the for the period of worst-case peak construction period and are short term.	The Applicant’s response doesn’t address the real issue of no respite for PRoW users. HGV movements is only one part. It is also the operations noise and visual, especially to horse riders. A day off a week gives people the opportunity to use the PRoW without noise and visual disturbance.	
A6.2	Cumulative Effects on PRoWs RR 21, RR 30, RR 36, RR 92 and RR 93	Details on the coordination with SPR can be found in Application Document 7.10 Coordination Document [APP-363]. Ongoing coordination will take place with SPR in order to align activities to minimise the requirement for PRoW diversions and closures. Notwithstanding the above document the Applicant has a strong working relationship with SPR and is regularly reviewing the SPR programmes for EA1N and EA2 alongside the National Grid	Understood and noted but no backup plan or assessment if this cannot be implemented, which was SCC’s point.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		Friston (Kiln Lane) Substation programme and the Sea Link Programme, to ensure PRoW's are not closed or diverted at the same time as others which will be used as a diversion.		
A6.4	Converter Station RR 100	The Applicant considers the committed mitigation proposed within the various Management Plans and Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043] to be sufficient for mitigating the potential impacts of the Proposed Project, including from a Traffic and Transport perspective. Nonetheless, the Applicant will review the Council's request for additional mitigation where this is not already proposed, to determine whether this is reasonable/necessary to help further mitigate any potentially significant effects as a result of the Proposed Project.	Traffic and transport is only one part of PRoW impact. Visual amenity and change of user experience should also be considered. SCC will welcome the Applicant's review of the mitigation.	
Socioeconomics, Recreation and Tourism (Item 2.11)				

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
A7.3	Labour market methodology	Noted and previously considered within Reference 108-109 in Table 2.11 (Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]).	SCC's position remains as set out in our Comments on any further information/submissions received by Deadline 1 and Deadline 1A (REP2-062). Our concerns regarding the Applicant's labour market methodology are not resolved, particularly in relation to the reliance on a generic 60-minute travel-to-work area and the absence of robust scenario-based workforce modelling. SCC has nothing further to add at this stage but encourages the Applicant to reassess its approach in line with SCC's Supplementary Guidance and the issues highlighted in this previous submission.	REP2-062
A7.6; A7.9	Skills and employment plan	The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any	SCC's comments as set out in REP2-062 continue to apply. The Applicant's decision to refuse to prepare a project-specific Skills and Employment Plan does not address SCC's outstanding concerns, as explained in this previous submission. In the absence of such a plan, SCC cannot be confident that	REP2-062

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		likely significant effects in relation to construction employment	labour-market risks will be mitigated or that socio-economic benefits can be secured. SCC has no further comments at this stage but strongly encourages the Applicant to reconsider its position.	
Approach to Assessment of Public Rights of Way – Document 9.45 [REP1-119]				
B4.2	Request for new PRoW route north of converter station site	As set out within Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014], the Order Limits along the B1119 do not include a Public Right of Way (PRoW) connection as it is not identified as essential mitigation in the Environmental Statement and therefore powers are not sought for this. It is noted that powers sought for compulsory acquisition must be necessary and proportionate and whilst it is acceptable in this context to seek rights for maintenance of the ditch and new planting; obtaining the rights for a permanent Public Right of Way is more challenging in the context that it has not been identified as	See SCC's response to the Applicant's answer to 1TT16 and 1TT17. Providing an alternative route for PRoW they are permanently closing is not like-for-like mitigation, especially as the user experience is substantially and significantly altered, from open fields and views to being re-routed next to a converter station with built form, restricted views and change of experience. The planting of vegetation along the proposed PRoW route is not envisaged to screen the converter station from the PRoW, due to the location of the proposed PRoW and the height of the converter station.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		being essential in the Environmental Statement.		
B4.3	Requested enhancement to the PRow network	<p>Acknowledged and agreed. Further engagement will take place with SCC regarding requests to enhance the PRow network. As set out within paragraph 3.2.2 of Application Document 9.45 Approach to Assessment of Public Rights of Way [REP1-119], additional PRow enhancements which go beyond essential mitigation are not included as part of the Proposed Project and therefore powers are not sought for this as part of the DCO.</p> <p>The Examining Authority, in Written Question 1TT16, has also requested a response to SCC requests for suggested PRow enhancements, to which the Applicant has provided a response within Application Document 9.73 Applicant's Responses to First Written Questions submitted at Deadline 3.</p>	Noted, but this site is not providing any mitigation for PRow users. Especially those impacted by the relocation of the route at the Saxmundham converter station. Views, amenity and experience will be impacted.	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
S.85 Technical Note				
B5.1	Acid grassland enhancement	<p>The appropriateness of enhancement of acid grassland to seek to further the purposes of the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (SECHAONB) is noted. Regarding the concerns around whether the proposals in the current form are appropriate, as noted in Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120], the enhancement of the area of land within the SECHAONB will contribute to aspirations within the SECHAONB Management Plan (National Landscape Partnership, 2023) and that the proposed acid grassland enhancement within the SECHAONB is considered to target the Natural Beauty and Special Qualities indicators as it has multifunctional purposes to further the purpose of the AONB, notably including landscape, ecology and biodiversity. This includes landscape quality, scenic quality, relative wildness,</p>	<p>The Applicant’s response does not address SCC’s concerns over the disproportionate nature of the Applicant’s claim that acid grassland enhancement constitutes the furthering of the conservation and enhancement of the SECHNL’s natural beauty given the fact that the impacts caused by the project go beyond just acid grassland removal.</p> <p>SCC notes the Five Estuaries decision letter but considers it imperative for the text cited by the Applicant to be read in the context of the preceding text stated by the SoS, which reads:</p> <p><i>“The ExA notes that a development of this scale, by its very nature, will struggle to conserve or enhance the special qualities of the Suffolk Coastal Heaths Area of Outstanding Natural Beauty, in terms of landscape and scenic qualities. However, the Secretary of State notes the Proposed Development’s</i></p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
		<p>relative tranquillity, natural heritage features, community and ecosystem goods and services.</p> <p>The Applicant considers that the Section 85 duty to seek to further the purposes of the SECHAONB has been complied with for the reasons detailed in REP1-120. In the decision letter for the Five Estuaries Offshore Wind Farm (published December 2025) on page 44 it is stated that “<i>The Secretary of State considers that the duty to conserve and enhance does not necessarily require all effects whatsoever, to be offset by enhancement measures</i>”</p>	<p><i>distance from the shore, and the design measures the Applicant has applied to mitigate the effects whilst maintaining the operability of the Proposed Development. The Secretary of State notes that the refinements to the northern array boundary and the reduction in blade tip height has served to reduce the visual impacts and maintain a level of separation between the existing, consented and proposed offshore wind farms.”</i></p> <p>It within this context the Secretary of State makes the statement that “<i>the duty to conserve and enhance does not necessarily require all effects whatsoever, to be offset by enhancement measures</i>” (emphasis in bold added).</p> <p>When read like this, it is quite clear that the SoS considers that the nature of the particular project in question, i.e. an offshore wind farm, means it is not appropriate to the type and scale</p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			<p>of development for all residual adverse effects whatsoever to necessarily be offset with enhancement measures for that project following paragraph 5.10.33 of EN-1. When it comes to Sea Link, what is “sufficient, appropriate and proportionate to the type and scale of the development” is certainly different to that of an offshore wind farm in SCC’s view. The starkest difference is in terms of parts of Sea Link’s works, and Order Limits, being within the designation of the SECHNL. One implication of this difference is that further enhancement measures could be explored within the Order Limits or through acquisition of adjacent parcels of land to conserve and enhance natural beauty beyond merely enhancing acid grassland.</p> <p>As stated in Table B5 of [REP2-062] and SCC’s response to 1LVIA7 of ExQ1 [REP3-101], SCC considers further enhancement measures to not only be necessary to allow the duty to be discharged but also appropriate and proportionate to the type and scale of the</p>	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			development. SCC reiterates that it urges the Applicant to seek engagement from the relevant local authorities and the National Landscape Partnership to discuss how this could be achieved. Appropriate enhancement measures could include contributions to coast & estuary project activity, contributions to enhancements to promoted routes, including National Trail to elevate experience for users and/or contributions to the Suffolk & Essex Coast & Heaths National Landscape Sustainable Development Fund.	
SCC's Comments on the Applicant's Schedule of Changes (REP1-107)				
B11.11	Sch.3 Req.15	Requirement 15 intends to prevent the Friston substation being constructed under one Order after already being constructed under another. Question 1GEN11 within Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices submitted at Deadline 3 provides further detail in relation to this requirement.	The Applicant's response does not attempt to address the points made here by SCC, nor is this the case for the referenced answer to 1GEN11. SCC also does not consider that requirement 15 functions as intended by the Applicant in terms of preventing the substation from being	

Ref. No	Topic	Summary of submission	SCC Response	Document Ref(s)
			<p>constructed under one Order after construction has started under another. Firstly, the requirement only applies to a part of the substation, so if one part has been completed another part could still be constructed under a different Order. Secondly, the requirement's restriction only applies when that part is completed, rather than commenced. This means that the substation could commence under SPR's DCO and could be completed under Sea Link's DCO. SCC does not see why this is necessary given that commencement means all requirements have been discharged by SPR and National Grid would be the entity constructing the Kiln Lane substation under that consent anyway. Instead, the requirement should prevent Work no. 1B from being constructed under the Sea Link DCO if it has been commenced under another consent.</p>	