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BY EMAIL

For the attention of the Case Team

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Dear Case Team,

**SEA LINK DCO APPLICATION (EN020026)
SCC PRINCIPAL AREAS OF DISAGREEMENT SUMMARY STATEMENT
(PADSS)**

Suffolk County council have produced a revised and updated principal areas of disagreement summary statement.

The intention of this revision is to ensure that the current principal areas of disagreement clearly articulated to the examination, and that those areas of disagreement reference the relevant arguments and supporting material provided to the examination by the Council.

Principal Areas of Disagreement Summary Statement (PADSS)

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
1.	Access Routes for Construction			
1.1	Selection of access route and assessment of alternatives	<p>Significant concerns have been raised to the Applicant regarding the justification of the choice of the western access route to the converter station site near Saxmundham via the B1121 and the inclusion of a crossing over the River Fromus. The Council believes other access routes which could have potentially avoided impacts caused by this access route have not been reviewed adequately.</p> <p>See Chapter 11 of [REP1-130] for further details.</p> <p>SCC has given a more detailed account of a potential alternative access route as requested by the ExA in response to Action Point 2 from CAH1 [REP4-149].</p>	<p>A justification document for the selected route was produced by the Applicant at the Council's request; however, the Council believes the document did not adequately explain the justification for discounting other potential options, including the use of the consented Sizewell Link Road.</p> <p>Further consideration of the alternative route from the north using the B1122/Sizewell Link Road should be submitted. This should include a detailed account of the positive and negative considerations of this route in comparison to the Applicant's chosen access route. If the Applicant decides to continue with its chosen route, then adequate justification must be given in light of the requested comparison.</p> <p>SCC has put forth an account comparing the positive and negative considerations of the</p>	Low

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			two routes in response to Action Point 2 from CAH1 [REP4-149].	
1.2	Use of Benhall Railway Bridge, B1121	Significant concerns relating to the proposed use of the Benhall Railway Bridge, B1121, a Council asset which, due to its structural condition, has a weight restriction of 46 tonnes (STGO 1). The Applicant has proposed overbridging for Abnormal Indivisible Loads (AIL) movements, however due to the geometry of the bridge and its proximity to the A12, the Council has concerns over the feasibility of this solution. Concerns include impacts of disruption whilst works are ongoing, including greater levels of traffic due to diversion through Saxmundham and A12/B1119 Rendham junction, lack of evidence on total number of movements that exceed the current weight limit, coordination of bridge closures with traffic related to other NSIPs in the area including Sizewell C and Scottish Power Renewables projects (SPR), lack of detail on temporary traffic management to	<p>As per the current access route, the railway bridge would form critical infrastructure to deliver the Sea Link scheme, therefore joint engagement with all relevant stakeholders is required, including Suffolk County Council (as asset owner) and Network Rail (due to the interaction with the East Suffolk Line).</p> <p>Suffolk County Council and East Suffolk Council requested an in-person meeting to progress outstanding highways matters, which was held in early August 2025.</p> <p>Further meetings have been held in January and February 2026.</p> <p>To date, there has been a lack of detail demonstrating the feasibility of the mini-bridge option which SCC, as the Local Highway Authority, requires at this stage to provide meaningful comment. The Council recognises that the Applicant has produced a feasibility study [REP4-101] but does not consider it to demonstrate feasibility of any of the AIL</p>	Not known at this stage, will likely be dealt with post-consent

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		<p>mitigate impacts of work relating to the bridge.</p> <p>See A1.1 & A5.1 of [REP2-062] and Chapter 11 of [REP1-130] such as paras 11.222 to 11.229 for further details.</p>	<p>delivery options. SCC has commented on this document at Deadline 5.</p> <p>SCC's preference, out of the options proposed by the Applicant, is for the bridge to be strengthened to provide long-term benefits and remove the need for future projects using the same access route to also implement the mini-bridge option. SCC is in the process of commissioning structural surveys at the request of the Applicant to determine the feasibility of strengthening the bridge. The results of this will likely not be known until after the end of the Examination.</p> <p>The Council considers that there has been a lack of exploration of alternatives such as provision in the Order Limits for installation of a new nearby bridge. Due to the lack of available information on the feasibility of the Applicant's AIL route options, SCC cannot be confident that the project has a robust AIL route. It should be noted that the alternative of the B1122 and B1069 added by the Applicant at Deadline 4 includes several structures which either have not been assessed, or are unsuitable, for the classification of loads to be</p>	

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			<p>transported by the Applicant and so does not provide a robust alternative.</p> <p>In addition, a more thorough assessment of the likely adverse effects during closures of the Benhall Bridge is required as detailed by SCC in its representation on Change Request 1 [REP3A-031]. This includes the adverse effects will be experienced by residents of the nearby Whitearch residential park not just in terms of their access, and how their access, including both 'routine' day to day trips and also less frequent but important trips such as emergency access and/or removals, will not be compromised. This also includes the likely effects on the residential park in other aspects such as in terms of noise and vibration, air quality and health and wellbeing as it is a receptor not thoroughly assessed in the ES which was carried out when the Order Limits were not close to this receptor.</p> <p>A more detailed assessment is also required in relation to the likely traffic and transport effects during closures of the Benhall Bridge. The addendum to the ES [CR1-055] appears</p>	

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			<p>to show minimal changes in traffic during closures of the Benhall Bridge along the indicative diversion route. To be clear, the assessment should cover not only the Applicant's diverted traffic but also diverted baseline traffic and consideration of diverted traffic from cumulative projects such as EA1N, EA2 and SZC which use the B1121 for non-HGV traffic. Further detail is given in [REP3A-031]. As of Deadline 5, this information has not been provided.</p>	
1.3	Proposed River Fromus Crossing	<p>The Council considers the construction of a 5-metre-high bridge across the River Fromus a disproportionate solution in creating a permanent access to the converter station were permanent access demonstrated to be necessary. There has been a lack of exploration and detail regarding the feasibility of a temporary solution.</p> <p>The proximity and proposed scale of the bridge will result in permanent loss of woodland and create significant adverse effects on the landscape</p>	<p>If the proposed access route for the converter station site is used, the installation of a temporary bridge should be explored in the first instance to seek to minimise adverse impacts.</p> <p>The Council considers a permanent bridge to be an unnecessary and disproportionate solution. See paragraphs 5.72 to 5.77 of [REP1-130] and the Council's response to Deadline 2 submissions for further detail.</p> <p>If a permanent bridge is used for the proposed access route, the design of the access road and bridge would need to be of outstanding</p>	<p>Not known at this stage.</p> <p>Little detail has been provided by the applicant regarding bridge design at this stage, with the indication being that design matters</p>

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		<p>character and setting of the Grade II Listed Hurts Hall and Grade II* Listed St John the Baptist Church in Saxmundham.</p> <p>The setting of the crossing has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018), and the area is identified as an important landscape as a rural approach to Saxmundham, reinforcing its setting within the Fromus valley. The removal of vegetation to facilitate the construction of the bridge will also open up views towards the converter station site.</p> <p>See A1.2 [REP2-062] and Chapter 11 [REP1-130] for further details.</p>	<p>quality and harmonise with its setting. Provision must also be made for benefit for the host community such as through the bridge being used as a public right of way.</p> <p>The Council recognises that, at Deadline 4, the Applicant proposes for there to be a permissive route along the access route to the converter station site. The Council considers this to be an improvement to the application but still considers that the route should be a PRow rather than a permissive route. In any case, the commitment has not been adequately secured in the DCO and crucial details are missing from certified documents. Details of how this will be implemented, such as in terms of managing pedestrian safety, should be secured in the REAC and relevant outline management plans, such as the outline PRow management plan.</p> <p>As currently proposed the Fromus Crossing is unacceptable.</p> <p>Although the design of the bridge is predominantly a district function, the Council supports the district's requirement that there be an appropriate consenting mechanism to</p>	<p>will be managed Post Consent.</p>

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			<p>ensure the design of the bridge is appropriate for its setting.</p> <p>The Council submitted joint wording for a DCO requirement at deadline 4 in conjunction with the other Councils in response to Action Point 115 of ISH2 [REP4-150]. However, it should be noted that the Councils consider that more detailed design parameters should be produced to ensure that there is confidence that best design will be sought within the constraints of functionality of the infrastructure.</p> <p>The Council notes that the most recent draft of the DCO includes an approval mechanism for the external colour and surface finish of the bridge in line with Design Principle ID.3. This is insufficient as there are several elements not controlled in the proposed wording which affect the external appearance of the bridge. SCC has detailed its full response to the Applicant's proposed wording in response to ExQ2 at Deadline 5. SCC considers the wording it proposed in collaboration with the other local authorities at Deadline 4 [REP4-</p>	

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			150] to be robust by comparison. SCC is willing to discuss changes to the proposed wording of the Requirement with the Applicant which is considered essential to reach agreement.	
2.	Converter Station Site			
2.1	Design - Building and landscaping masterplan	Concerns exist regarding the Applicant's approach to design regarding the Converter Station and associated landscaping of the site. A clear vision for the whole of the project is essential, but currently the lack of detail provided during pre-application is a cause of concern. Considering the scale of the development in a rural setting, good design for the converter station site is essential to mitigate the visual impacts of this and future schemes which may be accommodated on the converter station site. The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside	<p>The Applicant has engaged with the Suffolk Design Review Panel (DRP) regarding the Master planning of the site; however, it is felt there was a missed opportunity for the Applicant to publish the DRP feedback to demonstrate transparency and contribute to building public confidence in the project.</p> <p>The Council recommends that a DRP process is undertaken post-consent to finalise the design.</p> <p>There must be provision for an adequate consenting mechanism for the approval for the final design.</p> <p>The Council submitted joint wording for a DCO requirement at deadline 4 in conjunction with</p>	Not known at this stage as work on the design of the converter station and master planning of the site would continue post decision if consent were granted.

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		<p>the statutory consultees, including the relevant town and parish councils.</p>	<p>the other Councils in response to Action Point 115 of ISH2 [REP4-150].</p> <p>In addition to an appropriate consenting mechanism, more robust design principles should control the final design. The Applicant has provided little detail around the final design and wishes to retain a high degree of flexibility at this stage. The Council does not object with the principle of this approach but requires greater confidence that a robust design process will be followed post-consent which is both integrated with the delivery programme and coordinated with Lion Link.</p>	
2.2	Surface water drainage and flood risk	<p>Surface water drainage and flood risk at the converter station site needs to be comprehensively assessed and managed due to the topography and potentially poor infiltration properties of the Ancient Estate Claylands. Sufficient land should be included within the Order Limits to accommodate drainage for the site during construction and operation.</p> <p>See Chapter 8 [REP1-130] for further details.</p>	<p>Ongoing discussions required with the Council as the Local Lead Flood Authority (LLFA).</p> <p>There should be a requirement for a Drainage Management Plan to be approved by the LLFA which accords with national and local policy and guidance.</p> <p>The Council welcomes the addition of the requirement for a Drainage Management Plan to be submitted and approved which must be substantially in accordance with the outline plan. SCC set out its outstanding issues with the outline plan at deadline 4 in response to</p>	<p>Once the requested updates have been made to the outline Drainage Strategy – likely.</p>

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			Action Point 81 of ISH2 [REP4-150]. Since deadline 4, the Council has met with the Applicant to discuss these matters and understands that updates to the outline Drainage Strategy will be made to resolve this item.	

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3.	DCO Order Limits			
3.1	Insufficient land for mitigation within Order Limits	<p>Concerns over reductions applied to the Order Limits over the pre-application stage has limited the Applicant's ability to provide effective mitigation for areas including landscaping, visual amenity, enhancement and diversions of public rights of way. Examples include the Converter station site and alongside the B1119 to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users (NMUs).</p> <p>See A1.3 of [REP2-062] for further details.</p>	<p>The Council has cited concerns to the Applicant and cited that the area along with the River Fromus and the field north of the converter station site should form part of the Order Limits. In addition, the Council is concerned that, whilst the Order Limits are proposed to be extended to incorporate the Benhall Bridge, the extent of land included does not provide sufficient flexibility to embrace all potential solutions, including the option of installing a replacement bridge, parallel to the existing bridge, so minimising the disruption to traffic movements during its provision.</p> <p>Whilst the Council welcomes the increase in the Order Limits along the B1119 for mitigation, concerns remain over the lack of provision in the Order Limits for new public rights of way in this area and whether the increase in</p>	Unlikely – it is unlikely that there will be any further changes to the Order Limits during the examination, and the Applicant has indicated that it will not provide a PRoW along the B1119 nor implement the Council's request for further planting along the B1119.

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			<p>the order limits is enough for the proposed mitigation works. The rest of the Council's concerns are not addressed or affected by the change request.</p>	
3.2	<p>Friston substation site – Differences between Sea Link and SPR proposals</p>	<p>The Applicant Order Limits regarding the Friston Substation site do not match those consented by SPR. Areas of land set aside for landscape mitigation and diversion of public rights of way have not been included.</p>	<p>The Applicant needs to provide evidence that the Order Limits proposed around Friston substation is appropriate to accommodate mitigation for Sea Link, considering the mitigations already secured by the SPR consents.</p> <p>The Council is not satisfied that the landscape mitigation plans proposed for Sea Link are sufficient when considering what was considered for the SPR DCOs. It's not clear that the Order Limits include enough space for the mitigation which the Council considers necessary. The Applicant should provide improved landscaping plans and demonstrate that there is sufficient space to implement them</p>	Low
4.	Development Consent Order			

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4.1	Core Working Hours – Inclusion of Sundays and Public Holidays 7am-5pm	<p>The Council regards the inclusion of core working hours which spans seven days a week and Public Holidays as unacceptable due to the lack of respite for local residents from the impacts associated with construction activities including disruption to local roads and public rights of way (PRoW) used for recreational activities at a time when they are most frequently used.</p> <p>Regarding the potential delivery of the substation in Friston under the Sea Link DCO, the Applicant has not committed to undertake construction under the working hours agreed under the SPR consent which does not include Public Holiday and Sunday working.</p> <p>See Chapters 13-15 [REP1-130] and A1.4 of [REP2-062] for further details.</p>	<p>The Council requires the Applicant to align their working hours with SPR's consented schemes, which removes Saturday afternoons, Sundays and Public Holidays from the core working hours.</p> <p>The Council recognises that the Applicant has removed Bank Holiday working from the Core Working Hours. However, this does not address the Council's concerns of a lack of respite due to the infrequency of Bank Holidays. Therefore, this concern remains outstanding. SCC provided proposed wording for the core working hours in 15.47 to 15.56 of [REP1-130].</p>	Unlikely
4.2	Outline Management Plans	The Council is concerned regarding the level of detail submitted within the outline management plans and	The Council expects a two-stage approach where Management Plans are submitted in accordance with	Not known at this stage. Further

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		<p>the insufficiency of controls to adequately minimise environmental, social and economic adverse impacts.</p> <p>Outstanding concerns over the adequacy of outline management plans and mitigation commitments can be found in SCC's previous submissions such as paragraphs 15.42-15.45 [REP1-130] and [REP2-062].</p>	<p>Outline Management Plans for each phase of the development. The DCO has been updated to reflect this approach, with the exception of the Materials and Waste Management Plan which should be provided in outline form during the Examination and secured in the DCO as is the case for the rest of the management plans listed in Requirement 6.</p> <p>The Council also requires further information on the embedding of controls within management documents and the subsequent monitoring, compliance and enforcement of these measures.</p> <p>The details and control commitments the Council expects within the application's certified control documents in Schedule 3 are detailed in the Council's previous submissions, including [REP1-130], [REP3-101], [REP3-122], [REP4-150] and [REP2-062]. Many of the requested changes relate to SCC's principal issues</p>	<p>engagement with the Applicant is needed</p>

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			<p>detailed elsewhere in this document; however, SCC has also relayed concerns regarding particular wording. The details of outline management plans are crucial given that they form the basis of subsequent Discharge of Requirement approvals. Certain issues stated in SCC's previous submissions have been progressed although many outstanding concerns remain. Meetings on Highways, Water Environment, Landscape and Ecology matters have occurred with updated plans expected at future deadlines. Further meetings have been requested on other technical areas to progress matters.</p> <p>Regarding the Council's request for a Skills and Employment Plan, to be secured in the DCO, the Council understands that the Applicant intends to submit this at Deadline 6 after collaboration with the relevant local authorities. SCC welcomes this approach.</p>	

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4.4	Which consent will be used to construct substation at Friston (SPR or Sea Link)	The Applicant has yet to specify whether they would use their own DCO (if consented) or the SPR consent to build the substation at Friston. It is noted that there are discrepancies between the respective DCOs including the order limits and mitigation.	<p>SCC has requested that the Applicant must clarify that they plan to align with the SPR consent for the delivery of the substation in Friston and that this should be secured on the face of the Order.</p> <p>The Council recognises that there have been changes to the DCO to better align the substation with the SPR consent. However, these changes do not go far enough to remedy the concerns raised by the Council in terms of the Sea Link DCO's weaker controls and mitigation.</p> <p>SCC has submitted a document at Deadline 5 detailing how the DCO should be changed to achieve a necessary level of alignment between the consents. These requests recognise that it is unnecessary for the consents to be identical in terms of mitigation due to the differences in the number of substations being consented in the Sea Link DCO being</p>	Not known at this stage.

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			<p>only one. Therefore, the Council has taken a proportionate approach in its proposed changes to secure the necessary level of alignment in the wording of the DCO. Issues of alignment outside of the wording of the DCO, such as mitigation measures secured in outline management plans, are detailed elsewhere such as in SCC's ISH2 post-hearing submission [REP4-150] and corresponding oral submissions. Should these points be actioned by the Applicant to SCC's satisfaction, then this item would be considered resolves should scenario 2 remain within the application.</p> <p>However, the Applicant should seek to use the SPR consent and remove Scenario 2 from the DCO once it is clear that the substation will be built using the SPR consent. SCC understands that under the SPR consent, it is National Grid who will be constructing the substation. Once the works have commenced, SCC does</p>	

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			<p>not see why scenario 2 would nevertheless be necessary.</p> <p>The Applicant should either remove scenario 2 from the authorised development once this has occurred or otherwise commit to not constructing it under the Sea Link Order if it has already started construction under another consent. Requirement 15 should be reworded to reflect this commitment.</p>	
4.5	Inadequate DCO	<p>The Council is concerned by the lack of robustness within the DCO in various ways. This includes unclear and inadequate wording, protective provisions for highways of certain articles and requirements, inadequate process for discharging requirements and insufficient provision to ensure adverse effects are minimised and effects do not exceed those assessed.</p> <p>See SCC's submissions, including Chapter 15 of [REP1-130], table B11 of [REP2-062], SCC's responses to</p>	<p>The Applicant should consider the drafting changes proposed by SCC and seek to engage with the Council to reach agreement as far as possible.</p> <p>SCC and the Applicant are in the process of organising a meeting to make progress on this issue.</p>	<p>The Applicant has made certain changes endorsed by SCC. However, most concerns raised over Schedules 3 and 4 remain outstanding. The Applicant has indicated that it is not willing to change these parts of the DCO according to SCC's requests. Therefore, full resolution is unlikely.</p>

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		ExQ1 [REP3-101] and Comments on Deadline 3 submissions [REP4-201] for the full detail of this issue. .		
5.	Substation site in Friston			
5.1	Surface water flood risk	<p>Friston is a particularly sensitive area in terms of surface water flood risk to downstream receptors and has been subject to flooding on multiple occasions.</p> <p>It is essential that appropriate land is included on site to accommodate an effective drainage solution.</p> <p>See A4.1 of [REP2-062] and Chapter 8 [REP1-130] for further details.</p>	<p>SCC set out its remaining outstanding concerns in response to AP85 of ISH 2 [REP4-150]. Since this submission, SCC has met with the Applicant and understands that an updated Outline Drainage Strategy and additional information pertaining to the Flood Risk Assessment will be submitted to address SCC's outstanding concerns.</p>	Somewhat likely
5.2	Design	<p>Concerns exist regarding the Applicant's approach to design regarding the Kiln Lane substation and associated landscaping of the site. Considering the scale of the development in a rural setting, good design and landscaping for the substation site under scenario 2 is</p>	<p>The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils.</p>	Not known at this stage.

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		essential to mitigate the visual impacts of this and future schemes which may be accommodated on the site.	<p>There should be a requirement for the design to be approved.</p> <p>The Council submitted joint wording for a DCO requirement at deadline 4 in conjunction with the other Councils in response to Action Point 115 of ISH2 [REP4-150].</p> <p>The Council agrees with the approach of securing the approved documents submitted to discharge Requirement 12 of the EA2 DCO in the requirement governing design of the substation under Sea Link's DCO. However, SCC considers it necessary for all relevant information within those documents to control the Sea Link Friston substation. Any deviation from these documents should be controlled in the same way as Requirement 12 of the SPR consents to ensure the consents are consistent in their approach.</p>	
6.	Project-wide issues			

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6.1	Public Rights of Way – mitigation measures	<p>An array of adverse effects, including significant effects, have been identified for PRoW as a result of the Suffolk Onshore Scheme. There is inadequate provision within the application to avoid adverse impacts and explore the creation of new links during diversions.</p> <p>See paragraphs 11.231-11.241 [REP1-130], Table A6 and B3 of [REP2-062] and responses to the Applicant's answers to 1TT16 and 1TT17 of ExQ1 [REP4-201] for further details.</p>	<p>PRoW enhancement and creation should be explored and implemented. Potential measures for improving PRoW include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PRoW) alongside the Fromus crossing to link to the existing PRoW network.</p> <p>The Applicant should engage with the Council to discuss the opportunities for PRoW creation to resolve this item.</p> <p>There should be a commitment to keep Public Rights of Way open and available during the construction period as far as possible. This could be achieved through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for</p>	Not known at this stage – engagement with the Applicant is required.

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			the impacts on recreational users of the PRoW network, especially during the construction period. Appropriate wording to secure this was proposed by SCC in Table A6 of [REP2-062]	
6.2	Accommodation capacity and Tourism	<p>SCC is concerned that the assessment of accommodation which the Applicant has undertaken has not included, as a measure, the cost of accommodation across different types or indeed the knock-on costs in terms of private rented sector accommodation which is being drawn on. If there was an influx of demand for that sector, within that, what the consequences are on that sector, which not only serves the needs of the tourism sector but also the needs of the construction workers.</p> <p>The accommodation also serves some of the local populus, so there is a wider community impact. Further discussion is required with the Applicant but there needs to be some movement, as currently from the Applicant's assessment no significant impacts have been found</p>	<p>SCC requires further information on expected accommodation capacity and understands that East Suffolk is in the process of collecting relevant data. The Applicant should update its assessment according to this data should it be submitted during the examination. The Applicant should commit to monitor effects on accommodation capacity and tourism in coordination with cumulative developments, particularly Sizewell C, as well as wider tourism impacts. A proportionate contribution to foster tourism, of a similar vein to the fund created by Sizewell C, may be an appropriate approach if further embedded mitigation is not feasible.</p>	

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		<p>and therefore there is nothing to mitigate, which is a stance the Council believes needs to change. Peak construction phase will have an impact on tourism accommodation, especially when cross-over with other large-scale NSIPs occurs. It is important that all parties recognise the cumulative impact of multiple large-scale construction projects and plans accordingly.</p> <p>Suffolk has a year-round tourism economy and is a popular location for weekend and off-season breaks. Whilst there would clearly be some business generated as a result of this work, it is important that the accommodation sector is not completely overwhelmed, to the extent that the tourism sector is adversely affected</p>		
7.	Coordination with Other NSIP Projects			
7.1	Lack of coordination and acknowledgement of cumulative effects of Sea	The Council is deeply concerned regarding the apparent lack of meaningful discussion between Sea Link and other NSIP projects in the same locality, to find opportunities to	The Council cannot stress enough the importance of NSIP promoters not considering the impacts of their schemes in isolation. The mental health and wellbeing impacts are	Not known at this stage.

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	Link alongside other NSIP projects	<p>coordinate activities to reduce the impact of construction (e.g. on the highway network) of multiple projects on host communities on the East Suffolk Coast.</p> <p>As a result, differing landfall and cable routes have been selected by separate projects which will increase the impacts of construction on the host communities, landscape, and ecology.</p>	<p>cumulatively increasing with each new project.</p> <p>Promoters must consider the impacts of their scheme in association with the timelines of the construction of other NSIP projects in geographic proximity and have meaningful discussions to develop strategies to minimise the impacts of multiple, successive NSIP schemes on host communities and the environment.</p> <p>Evidence should be produced demonstrating that the Applicant has done as much as could reasonably expected to coordinate and collaborate with developers of NSIPs in the vicinity, including by seeking to enter into formal collaboration agreements such as data sharing to facilitate future coordination and minimisation of adverse impacts. The Council does not consider that the application has achieved this. It is recognised that it may not be possible for coordination agreements and</p>	

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			<p>strategies to be formed between the relevant parties during the examination. In this case, the application should ensure that coordination is embedded in the relevant outline management plans such that the detail of coordination is finalised post-consent and submitted to the relevant planning authority.</p> <p>Particular areas where coordination during delivery will be crucial include traffic and transport, health and wellbeing, public rights of way, socio-economics and tourism and landscape and visual. Where uncertainty remains over how cumulative effects will materialise during delivery, commitments should be included in certified DCO documents to collaborate with the promoters of cumulative developments to ensure there is frequent communication around findings from monitoring and where effects may be greater than expected, an adaptive approach is taken to</p>	

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			<p>implement measures in an appropriate and proportionate way.</p> <p>The Applicant should commit to doing as much as reasonably possible from its side to facilitate such an approach. Precise and enforceable commitments in this regard should be secured appropriately in the DCO.</p>	
7.2	Coordination with the National Grid Ventures (NGV) LionLink Scheme	<p>Although the Converter Station site provides a colocation for both Sea Link and LionLink schemes, the Council feels that the Applicant could reduce the environmental and construction impacts of the scheme by laying additional ducts alongside those required for the Sea Link project (for example for High Voltage Alternating Current (HVAC) cabling between the converter station and the substation at Friston).</p> <p>The Applicant should seek to coordinate the Sea Link construction</p>	<p>The Council suggest that the Applicant includes the flexibility within the DCO to accommodate laying additional cable ducts for LionLink to reduce the impacts and disruption which would occur due to successive NSIP projects requiring to undertake cable installation in close proximity in both time and location. This could be secured in the DCO in an appropriately qualified way which does not add risk to the delivery of Sea Link but ensures coordination is maximised should Lion Link receive consent. Requirement 42 of the SPR</p>	Not known at this stage. Further discussion with the Applicant is needed

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		<p>compounds with LionLink (where works overlap) during construction of the converter station.</p>	<p>DCOs could be worked into the Sea Link DCO such that the promoter will laying additional cable ducts for Lion Link should the works take place after Lion Link has received development consent where the cable routes of the two projects overlap.</p> <p>The Council urges the Applicant to work with NGV to agree coordination of construction compounds to prevent unnecessary impacts of separate construction compounds.</p>	
7.3	<p>Substation at Friston – Interaction of cable route with consented East Anglia One North and Two Planting</p>	<p>As currently designed, there is a considerable risk that the HVAC cable corridor route proposed to the substation at Friston could impact the landscape planting consented under East Anglia One North and Two.</p>	<p>The Applicant needs to work with SPR to consider options to minimise the potential impacts of the proposed cable route into the Friston substation on the consented landscape planting for East Anglia One North and Two.</p> <p>In the first instance, the Council considers that HDD should be implemented to connect to the substation to avoid interfering with the landscape mitigation and PRow proposed by SPR. If this is not feasible, and interaction with the SPR</p>	<p>Not known at this stage</p>

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
			mitigations is unavoidable, the Applicant should consider implementing planting elsewhere to minimise the adverse effects of this interaction.	
8.	Cumulative Impacts			
8.1	Environmental and Socio-economic impacts of cumulative developments in East Suffolk.	<p>The Council has significant concerns regarding the cumulative environmental and socio-economic impact of Sea Link alongside the construction of other NSIP projects in the area, including Lion Link, Sizewell C and those consented which will be delivered by SPR. Particular concerns exist around cumulative effects on traffic and transport, landscape, tourism, workforce, PRowS and health and wellbeing including mental health.</p> <p>Detail on SCC's concerns can be found in its examination representations including [RR-5209], [REP1-130] and [REP2-062]. SCC</p>	<p>There is a need for a full worst-case scenario assessment of environmental and socio-economic cumulative effects of the project in conjunction with others taking place in East Suffolk. The comments made by the Council in its previous submissions should be addressed within the assessment.</p> <p>Notable concerns expressed by the Council include the application of inadequate assessments of the likely effects of the Sea Link project leading to potentially inaccurate conclusions of likely significant effects in the cumulative effects assessment, the robustness of the cumulative transport assessment and an apparent general underestimation of the magnitude of</p>	Not known at this stage.

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
		<p>has proposed specific mitigation measures in response to 2CEInter1 of ExQ2.</p>	<p>cumulative effects despite significant uncertainty of certain effects such as health and wellbeing and socio-economics and tourism.</p> <p>The Applicant should commit to appropriate and sufficient mitigation measures both alone and in conjunction with cumulative projects to adequately avoid and minimise adverse effects.</p> <p>SCC considers that there is significant uncertainty over the likely cumulative effects in multiple areas including Health and Wellbeing, Socioeconomics and Tourism and Traffic and Transport. As a result, SCC does not consider that there is enough evidence to suggest no mitigation is necessary. At least, robust monitoring measures should be implemented to detect how effects occur. The Applicant should engage with SCC to agree on what these measures should be.</p>	
9.	Schedulable Archaeological Site Discovery			

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
9.1	Approach to mitigation around significant monument in the Parish of Friston	<p>At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ, following the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in</p>	<p>If the Applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, the Suffolk County Council Archaeological Service (SCCAS) do not object to the expansion of the Order Limits in line with the areas proposed in the change request.</p> <p>SCCAS are pleased that geophysical survey and trial trenched evaluation has now been completed for these new areas (the additional geophysical survey report has now been submitted and SCCAS are happy to approve this document, and although the additional trial trenched evaluation report is pending, SCCAS have monitored the results of this work in person in the field).</p> <p>Although some additional archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be</p>	Somewhat likely

Item	Area of Concern	Explanation	Remedy Item	Likelihood of Resolution
		<p>situ and mitigation through excavation would now be acceptable</p>	<p>required in this section of the cable corridor, there is a suitable alternative route which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance. SCC requires clarity on what approach the Applicant is taking regarding the cable route in this area.</p>	

Yours faithfully,

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Senior Planning Officer

Growth, Highways & Infrastructure

Suffolk County Council