

# SEA LINK

EN020026

## Answers to Examining Authority Questions Round 2

Suffolk County Council



Deadline 5

10 March 2026

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## Glossary of Acronyms

<i>AI</i>	<i>Artificial Intelligence</i>
<i>CA</i>	<i>Compulsory Acquisition</i>
<i>CEMP</i>	<i>Construction Environmental Management Plan</i>
<i>CIL</i>	<i>Community Infrastructure Levy</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExQ1</i>	<i>Examining Authority's First Round of Written Questions</i>
<i>ExQ2</i>	<i>Examining Authority's Second Round of Written Questions</i>
<i>ISH1</i>	<i>Issue Specific Hearing 1</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PINS</i>	<i>The Planning Inspectorate</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SECHNLP</i>	<i>Suffolk &amp; Essex Coast and Heaths National Landscape Partnership</i>

*"The Council" / "SCC" refers to Suffolk County Council.*

## Purpose of this Submission

The document has been prepared by Suffolk County Council to answer to the Examining Authority's Second Round of Written Questions (ExQ2).

The response format is based on the template provided by the Planning Inspectorate case team. For ease of reference, questions which are not addressed to Suffolk County Council have been deleted. Where another Local Authority is the lead authority, this has been attributed. Examination Library references are used throughout to assist readers.

## Answers to Examining Authority’s First Round of Written Questions (ExQ2)

ExQ2	Question to:	Question:	SCC Answer:
<b>1 General and Cross-topic Questions (GEN)</b>			
<b>General</b>			
2GEN2.	All parties	<p><b>Need</b></p> <p>The need for the project was explored at ISH1. Several parties have made submissions requesting that the topic of need be discussed again at a future ISH. The ExA reminds all parties that the examination is a predominately written process.</p> <p>Due to the highly technical nature of need as a topic and the necessity for considered responses to questions, the ExA’s current view is that it will be most assisted by examining the evidence in writing. To date the ExA has received extensive evidence on the topic of need, both orally and in writing, and is carefully considering the cases of the parties. If any party has any new or additional evidence, they</p>	<p>SCC has not challenged the need for the proposed interconnector between Kent and the East Suffolk coast. However, SCC is concerned with the use of the need case to justify the inadequacy or absence of necessary mitigation measures, particularly in terms of core working hours.</p> <p>The Applicant has not addressed SCC’s concerns that the project time line has not been updated to reflect the fact that the DCO is unlikely to be made before the end of 2026 (whereas the Applicant has assumed a date of Q2/2026) and nor has the Applicant provided any calculations either to support its claimed additional costs of delay if the core working hours are restricted as suggested by SCC or to show what any such costs would be on a per capita basis (per consumer). These concerns were set out in SCC’s submissions at ISH2 (and are reflected in its Post Hearing</p>

ExQ2	Question to:	Question:	SCC Answer:
		believe is important and relevant to the examination of need, we ask that it is submitted for DL5 in order to allow a fair opportunity for all parties to comment on each other's submissions.	Submissions following ISH2 (section 16.1) in [REP4-150] and have not been addressed.
<b>Design, parameters and other details of the Proposed Development</b>			
2GEN6.	East Suffolk Council (ESC), Thanet District Council (TDC), Kent County Council (KCC), Suffolk County Council (SCC), Historic England	<p><b>Detailed design in the dDCO requirement 3</b></p> <p>Provide comments on the applicant's wording in requirement 3 of the dDCO [REP4-217] and whether it would provide adequate controls over the design of above ground elements of the proposed development.</p>	<p>Please refer to the SCC response to 1GEN47 in Table A1 in its Comments on Submissions received by Deadline 3 [REP4-201].</p> <p>SCC does not consider that the Applicants' wording in requirement 3 of the dDCO [REP4-217] would provide adequate controls over the design of above ground elements of the proposed development. SCC remains of the view that its proposed wording in response to Action Point 131 as submitted at Deadline 4 [REP4-150] is appropriate and meets the relevant tests for planning requirements.</p> <p>The proposed above ground structures result in significant adverse residual effects. Given the large degree of flexibility sought by the Applicant at consenting stage, SCC considers that a full approval process is required to provide the decision maker with greater confidence</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>around the post-consent detailed design stage that best design will be sought.</p> <p>The approval process for each piece of permanent infrastructure referenced in the requirement should include, massing, shape/external design and appearance, materials, finishes, external lighting and detailed landscape proposals. By comparison, for the Fromus bridge and the converter station, only the '<i>external colour and surface finish</i>' requires approval which is severely deficient given the exclusion of various aspects of the infrastructure relevant to their design and the residual significant adverse effects. There is no coherent operational reason for restricting the discharging authority's design control to only these aspects of substantial built features which are being introduced into a rural setting with both landscape and heritage attributes and sensitivities.</p> <p>There is only one design principle (ID.3) referenced in 3(d) in relation to the Fromus bridge which was clearly not drafted specifically for the bridge as it mentions the design of roofing. Given the large degree of flexibility sought by the Applicant despite the significant permanent adverse effects of its proposed bridge, more certainty should be given over the processes and outcomes which will be</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>sought through the design process. This could be achieved through dedicated design principles for the bridge, as envisaged within SCC’s proposed wording for the requirement in [REP4-150]</p> <p>3(c) of the requirement references a technical statement which should also require approval to ensure that the details included regarding ‘.. <i>demonstrating how ... the Applicant has sought to reduce the scale of the bridge ...</i>’ are verified by the relevant authority. This would ensure there is accountability for the Applicant to seek to minimise residual effects.</p> <p>For the substation, SCC welcomes the principle of using the documents approved for Requirement 12 of the SPR consents as the relevant control of the substation on account of the extensive design processes used by SPR to inform the final design which the Applicant is unwilling to align with.</p> <p>However, it is deeply concerning that only 4 items from these documents form the controls in the Applicant’s requirement. National Grid will be constructing the substation under the SPR consents and so there is no reason why this application cannot commit to constructing the substation in accordance with the</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>documents approved under Requirement 12 of the SPR DCOs.</p> <p>Requirement 12 of EA2 has now been approved as application DC/25/4827/DRR<sup>1</sup>. This can now be explicitly referenced in the Applicant’s requirement.</p> <p>To illustrate that NGET will be constructing the substation under that consent, the Onshore Substation Detailed Design Report approved under Requirement 12 states ‘<i>The National Grid infrastructure has been consented as part of both the EA ONE North and EA TWO DCOs but will be constructed by National Grid Electricity Transmission (NGET).</i>’ the National Grid substation has gone through an extensive design process under the SPR consents.</p>
<b>Draft Development Consent Order (dDCO)</b>			
2GEN13.	Applicant, Local Authorities	<p><b>Article 49 - Defence to proceedings in respect of statutory nuisance</b></p> <p><b>Applicant:</b> Article 49(1)(b) provides for a defence against statutory nuisance in operation and if “the defendant shows that the nuisance— (i) relates to premises used by the</p>	<p><i>Public Health</i></p> <p>Public Health note that matters relating to statutory nuisance, noise and vibration assessment and the interpretation of operational noise control provisions fall within the professional remit of the District Councils Environmental Health Officers, who serve as the authority</p>

<sup>1</sup> <https://publicaccess.eastsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=T75IV1QX07400>

ExQ2	Question to:	Question:	SCC Answer:
		<p>undertaker for the purposes of or in connection with the use of the authorised project and that the nuisance is attributable to the use of the authorised project which is being used in accordance with the Construction Noise and Vibration Management Plan”. As the outline Construction Noise and Vibration Management Plans [AS-131] and [AS-133] contain no operational noise controls, explain the purpose of this clause and whether additional operational noise controls should be referenced.</p> <p><b>Local authorities:</b> To comment</p>	<p>in respect of statutory nuisance. Accordingly, Public Health defer to Environmental Health colleagues on the technical interpretation of Article 49(1)(b), including the implications of the absence of operational noise controls within the outline Construction Noise and Vibration Management Plans [AS-131] and [AS-133], and whether additional operational noise control mechanisms should be secured within the Development Consent Order.</p>
2GEN14.	Local Authorities, Applicant	<p><b>Article 51 - Arboricultural Method Statement (AMS)</b></p> <p><b>Local authorities:</b> The applicant’s response to ISH2 AP18 [REP4-086] explains that there is no need to amend Article 51 of the dDCO in respect of ancient and veteran trees because any tree works would be detailed in the AMS secured by requirement 8 of the dDCO, which is subject to local authority approval.</p>	<p>Detailing tree works does not afford protection for trees. Neither Article 51 nor Requirement 8, in their current wording, provide any reassurance that ancient or veteran trees will not be affected by the proposed works.</p> <p>SCC considers that the exclusion of works to ancient and veteran trees needs to be included both in Article 51 (for example as part (11)) and in Requirement 8, detailing that their provisions do not extent to ancient and veteran trees in general, and the identified ancient and veteran trees in</p>

ExQ2	Question to:	Question:	SCC Answer:
		<p>Requirement 8 does not make explicit reference to ancient and veteran trees. If requirement 8 is the correct mechanism to control effects, should it explicitly make reference to retention of ancient and veteran trees, for example linking to a specific dDCO schedule?</p> <p><b>Applicant:</b> To comment.</p>	<p>particular, and that any works to such trees would require approval by the relevant local authority, under exceptional circumstances. SCC agrees that these trees should be listed in a schedule that is linked to Article 51 and Requirement 8.</p>
2GEN15.	Local Authorities and Environment Agency (EA)	<p><b>Article 53</b></p> <p>Article 53(2)(b) allows for complete closure of the navigation on health and safety grounds only. 53(3) secures that this is kept to a minimum period. Should additional wording be included to specify what is a reasonable period or any seasonal constraints where closure may be inappropriate. If yes, please include suggested drafting.</p>	SCC has no comments on this question
2GEN17.	Local Authorities, Applicant	<p><b>Schedule 3 – Requirements - trenchless landfall</b></p> <p><b>Local authorities:</b> In light of interested party (IP) concerns, the sensitivity of the receiving environment (including designated European</p>	<p>Trenchless cable installation techniques will be essential in both Suffolk and Kent, given the sensitive habitats present at the respective landfall sites. Vegetated shingle is present close to the Suffolk landfall site and this is both a Priority Habitat for Suffolk and the UK. SCC Ecology</p>

ExQ2	Question to:	Question:	SCC Answer:
		<p>sites) and notwithstanding the applicant's updated wording in the revised Register of Environmental Actions and Commitments (REAC) [REP4-235], provide draft wording to secure the use of a trenchless landfall technique as a dDCO requirement.</p> <p>The wording should provide for construction and operation/maintenance and may also provide for a minimum depth of burial to address concerns regarding coastal erosion.</p> <p><b>Applicant:</b> To comment or provide its own form of wording</p>	<p>welcome the commitment to using trenchless techniques to install the cables at the landfall site in Suffolk.</p> <p>SCC understands that East Suffolk Council intends to submit requirement wording in response to this question and supports their proposal.</p>
2GEN26.	All parties	<p><b>New requirements and conditions</b></p> <p>Notwithstanding any questions below, highlight and provide specific wording for any commitments currently included in the REAC [REP4-235] that you believe should be secured as requirements or conditions on the face of the order.</p>	<p>In general, SCC does not take issue with commitments lying within the REAC, rather than on the face of the Order. However, where these commitments are potentially contrary to provisions within the Order, these commitments should be included within the Order itself to avoid the potential for the provisions of the Order taking priority. There may also be potential for commitments in the REAC which should require approval to implement such as in relation to any removal of ancient/veteran trees.</p> <p><i>Arboriculture</i></p> <p>Mitigation commitment A05, Retention of veteran and ancient trees, should be included in the DCO (in Article 51</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>and/or Requirement 8). The wording should be explicit that no ancient or veteran trees can be removed without prior approval of the relevant planning authority. Whilst SCC recognises the need for the possibility of removing these trees on safety grounds, this should not be possible without prior approval which, as the DCO currently sits, could be avoided if done as a pre-commencement operation. The relevant identified trees should be included in a schedule of the DCO linked to the relevant article and requirement. This would avoid</p> <p><i>Ecology and biodiversity</i></p> <p>Commitment B39 regarding operational lighting at Saxmundham Converter Station should be included in the DCO in an amended Requirement 3, clarifying that a detailed lighting design scheme will need to be submitted to and approved by the relevant local authority.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>2 Landscape and Visual</b>			
2LVIA8.	ESC, TDC, KCC, SCC	<p><b>Lighting and fencing</b></p> <p>Further to your responses to ISH2 Action Point 131, explain whether you consider that relevant planning authorities require control over details of lighting and fencing. If so, provide suggested wording. If not, explain why you consider that there would be adequate existing controls.</p>	<p>Fencing: can result in significant additional adverse visual effects, which are not considered in assessments, therefore it is important that boundary treatments are controlled through approval by RPA.</p> <p>Lighting: External lighting schemes as well as the hours during which different levels of lighting will be operated can have significant effects on neighbouring visual receptors and wildlife. Light spill, light intrusion, and sky glow all need to be minimised. SCC considers that this minimisation needs to be secured through approval of lighting schemes by the relevant local authority, in addition to the agreed design principles and commitments in the REAC.</p>
2LVIA10	Applicant, ESC, SCC, SEAS and other relevant stakeholders	<p><b>Cumulative effects on the AONB</b></p> <p><b>Applicant:</b> The updated assessment of effects on the sub-factors of the special qualities and natural beauty indicators set out in the Planning Statement Addendum [REP4-092] is welcomed. The cumulative assessment provided in table 4.1 of the National Landscape Section 85 Duty Technical Note</p>	<p>Within the AONB, the likely significant cumulative effects on the natural beauty and special qualities of the AONB, as identified in table 4.1 of [REP1-120], focus on the construction phase, and the time it will take to restore the landscape to its pre-construction baseline.</p> <p>In terms of potential mitigation measures, SCC considers there may be limited scope to reduce adverse effects on the natural beauty indicators assess to incur significant</p>

ExQ2	Question to:	Question:	SCC Answer:
		<p>[REP1-120] is only in relation to the indicators rather than the sub-factors.</p> <p>Provide a more detailed cumulative assessment in relation to the sub-factors for the natural beauty indicators and special qualities indicators with a greater level of detail as to the factors that have led to the conclusions for each indicator and the magnitude of the effect. Where a temporary significant adverse effect is identified, specify the likely duration of the temporary effect and whether any avoidance, mitigation or compensation measures could be identified that would reduce the magnitude of the effects.</p> <p><b>ESC, SCC, SEAS and other relevant stakeholders:</b> Suggest potential mitigation or compensation measures for the likely significant cumulative effects on the special qualities and natural beauty of the AONB, as identified in table 4.1 of [REP1-120].</p>	<p>cumulative effects through embedded mitigation due to the nature of the works. The area within the order limits is also quite limited to facilitate meaningful offsetting measures. If the Applicant is unable to mitigate/offset these effects within the order limits, there is potential for offsite commitments to be made to enhance the affected natural beauty indicators according to the objectives of the National Landscape Partnership’s Management Plan. This could be achieved by some commitment to seek to explore projects to enhance natural beauty outside of the order limits.</p> <p>Such projects are regularly undertaken through grants awarded through the National Landscape Partnership’s Sustainable Development Fund. This would have to be done outside of the DCO itself on account of the need to gain the relevant permissions from landowners etc. but a commitment to finalise the details post-consent could be secured in the DCO. Alternatively, the Applicant could instead commit to entering into a legal agreement to contribute to an appropriate scheme which funds projects which enhance the natural beauty of the National Landscape, such as the Sustainable Development Fund hosted by the Partnership.</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>SCC provides the following comments on the natural beauty indicators assessed to experience significant cumulative effects.</p> <p><i>Landscape Quality</i></p> <p>The National Landscape Section 85 Duty Technical Note [REP1-120] suggests that the additional loss of acid grassland of 7.61ha would be mitigated by the temporary enhancement of 6ha acid grassland for 10 years.</p> <p>The size for an enhancement area of 6 ha is based on the professional judgement and reasoning, that is sufficient to enhance an area approximately half the size of the area that would be disturbed. It is unclear how this professional judgement was reached and whether stakeholders and consultees agreed that this would be sufficient.</p> <p>However, it is welcome that the 6 ha were retained for enhancement, when the Applicant was able to reduce the affected area from the original 12ha to 7.61ha.</p> <p>There are several concerns with regards to the Applicant's approach.</p> <p>Firstly, from Plate 3.2 -Preferred area of acid grassland enhancement [REP1-120], the preferred area appears to be only to a small extent land in arable land, and to mostly</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>consist of scrubland, which in itself has an ecological value. SCC considers it must be assessed whether this can be considered degraded acid grassland, as per the technical criteria in Paragraph 3.2.1 and what habitats will be lost in order to provide acid grassland enhancement.</p> <p>Secondly, it will need to be assessed and monitored whether the enhanced acid grassland Area (6ha) will be established enough to be a suitable replacement/mitigation for the affected grassland areas during construction. There might be a period of time, when the statutory duty is not met.</p> <p>Thirdly, the acid grassland area directly impacted by the development, once it has regenerated will only return the habitat baseline to what it was pre-development. This only meets the conserve part of the S85 duty. It is the acid grassland enhancement area which would meet the enhancement part of the S85 duty, giving reason to retain the enhanced acid grassland over a longer timescale to the 10-year period being proposed.</p> <p>SCC considers that a period of 30 years, akin to that for BNG provisions, would be a more realistic timeframe to achieve meaningful mitigation for, and enhancement of the natural beauty and special qualities of the AONB,</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>satisfying the strengthened duty under Section 85 of CROW Act 2000.</p> <p><i>Scenic Quality</i></p> <p>It is expected that there would be significant residual cumulative effects on the Scenic Quality within the AONB during construction [REP1-120], resulting from the construction of the landfall and HVDC cable corridor and associated traffic movement.</p> <p>SCC considers that the residual significant adverse cumulative effects are not able to be mitigated, and that therefore compensation measures should be considered.</p> <p><i>Relative wildness</i></p> <p>It is expected that there would be significant residual cumulative effects on the relative wildness within the AONB during construction [REP1-120].</p> <p>SCC considers that the residual significant adverse cumulative effects are not able to be mitigated, and that therefore compensation measures should be considered.</p> <p><i>Relative tranquillity</i></p> <p>It is expected that there would be significant residual cumulative effects on the relative tranquillity within the AONB during construction [REP1-120].</p>

ExQ2	Question to:	Question:	SCC Answer:
			<p>SCC therefore considers that the Applicant should be more specific in the REAC [REP2-235], with regards to appropriate mitigation measures that will be implemented to minimise any potential nuisance (see GG10), where it is not possible or practicable to avoid proximity of sensitive receptors. Such mitigation could include stricter limits to construction working hours, and additional measures to minimise adverse effects.</p> <p><i>Natural heritage features</i></p> <p>The Technical note considers that, overall, the residual adverse effects would not be significant.</p> <p>While SCC considers that effects that occur in a part of the AONB, need to be considered as affecting the entirety of the AONB, SCC acknowledges that the significant adverse effects on acid grassland and its supporting species are considered by the Applicant in relation to Landscape Quality.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>3 Ecology and Biodiversity</b>			
2ECOL5.	Natural England (NE), RSPB, Local Authorities	<p><b>Unexploded Ordnance (UXO)</b></p> <p>Explain whether the proposed approach to UXO outlined in the applicant’s response to ISH2 AP16 [REP4-086] is sufficient to ensure that potential effects on the designated sites could be appropriately mitigated.</p>	<p>SCC has no objection with the approach to UXO from the applicant, as outlined in document (REP4-086)</p>
2ECOL8.	Applicant, Local Authorities	<p><b>Benhall bridge works</b></p> <p><b>Applicant:</b> Explain what the potential is for the rail corridor at Benhall Bridge to act as a bat commuting corridor and dormouse habitat and whether this would require additional survey and/or mitigation measures? Where relevant provide a commitment in the REAC [REP4-235] or Suffolk oLEMP [REP4-065].</p> <p><b>Local authorities:</b> It is noted that the extent of pre-construction surveys has been restricted in the revised oLEMP as follows “These surveys will include surveys of breeding and non-breeding birds (particularly nesting Schedule 1 species), bat activity (focussed on locations where failures of automated bat detectors</p>	<p>SCC Ecology are broadly happy with the range of surveys proposed for this location. SCC defers to East Suffolk Council on other matters relating to these surveys. SCC is keen to see the survey reports as soon as they are made available.</p> <p>The presence or otherwise of bats or dormice in the vicinity is a factor that must be considered in any temporary or permanent work to Benhall Bridge and an pre-commencement survey is recommended noting that similar issues on the A12 at Marlesford delayed delivery of SZC mitigation work.</p>

ExQ2	Question to:	Question:	SCC Answer:
		<p>occurred during baseline surveys resulting in fewer than the standard 5 nights of activity being recorded in those locations), riparian mammals, dormice (specifically regarding Area D where an ambiguous record exists from the original survey) and badgers.” Comment on whether the extent of surveys should be increased.</p>	
2ECOL12.	RSPB, Local Authorities, NE	<p><b>Updated wintering bird survey</b></p> <p>Comment on the applicant’s statement in [REP4-241] that “since the North Warren RSPB Reserve is being treated as a sensitive receptor, the Applicant does not consider that updated information regarding the number and distribution of wintering birds within the Reserve is required, particularly since RSPB have good data for their Reserve.”</p>	<p>SCC Ecology agree with the applicant regarding using the RSPB data to update the winter bird surveys. As they own the North Warren site, the RSPB will be able to provide a full and accurate picture of the overwintering bird species that use this particular reserve.</p>
2ECOL13.	NE, RSPB, Local Authorities	<p><b>Suffolk Wintering Bird Survey Report</b></p> <p>Provide any further comments on the assessment of effects on wintering birds, based on the updated Suffolk Wintering Bird Survey Report appendix 2.2.b [REP4-037].</p>	<p>SCC are broadly content with the assessment of the effects on overwintering birds stated in this report. However, SCC defers to the expertise of NE and RSPB SCC Ecology would like to see updated survey for both overwintering and breeding birds as the last surveys were carried out in 2024 (2 years ago).</p>

ExQ2	Question to:	Question:	SCC Answer:
2ECOL14.	Applicant. Local Authorities, RSPB	<p><b>Seasonal restrictions - Suffolk</b></p> <p><b>Applicant:</b> Section 6.7 of the Suffolk oLEMP [REP4-065] explains that topping/flailing works would be restricted during the bird ground-nesting season (i.e. avoiding March to August). In light of previous amendments relating to the bird breeding season, should this read February to August?</p> <p><b>Other parties:</b> To comment.</p>	If the bird breeding bird nesting season is widely considered to be 1st March to 31st August and this should be adhered to when undertaking flailing/topping works in areas of suitable habitat for ground nesting species such as Skylark.
2ECOL15.	SCC, Applicant	<p><b>Seasonal restrictions - Suffolk</b></p> <p>SCC [REP4-150] suggests that compound works in Suffolk should not be undertaken in the winter months. Explain whether the applicant's proposed 1 January to 31 March restriction on works as set out in provision O03 of the REAC [REP4-235] satisfies this requirement.</p> <p>The applicant may wish to comment.</p>	The dates for over winter should be listed as 1st December to 31st March. These dates cover the months when overwintering bird species are most likely to be found on the RSPB North Warren reserve and will be most susceptible to disturbance. Cold weather warnings should also be adhered to in this period which are defined as three consecutive days of freezing temperatures. However, SCC defers to ESC regarding what range of dates is most appropriate.

ExQ2	Question to:	Question:	SCC Answer:
2ECOL18	Applicant Local authorities	<p><b>Deer management</b></p> <p>Provide an update on discussions regarding deer management with EDF as referenced in section 6.4 of the Suffolk oLEMP [REP4-065]. The local authorities may wish to comment on the proposed approach.</p>	<p>SCC Ecology are happy with the proposed approach to deer management from the applicant (detailed in the oLEMP). SCC would add the proposed badger gates in the fencing around the planting should be weighted sufficiently to allow badger movement but prevent access to the planting for rabbits.</p>
2ECOL19.	Applicant, EA, Local Authorities	<p><b>Potential ecological opportunities</b></p> <p><b>Applicant:</b> Paragraph 1.35 of the Aquatic Ecology Survey Report [APP-104] suggests that the River Fromus has poor ecological status due to diffuse and point source pollution and barriers, issues which would be disproportionately expensive to fund. Blue Spaces – Saxmundham [RR-0589] also suggests measures to improve the River Fromus. Does the applicant consider that there is any potential to address some of the identified constraints as part of the applicant’s proposed biodiversity net gain (BNG) measures?</p> <p><b>EA and local authorities:</b> To comment.</p>	<p>SCC Ecology are keen to hear from the applicant on how they propose to address this matter</p>

ExQ2	Question to:	Question:	SCC Answer:
2ECOL21.	Applicant, Local Authorities, NE	<p><b>Impact of pylon base installation</b></p> <p>Table 9.23 of Kent chapter 9 noise and vibration [AS-111] identifies use of pad foundations for pylon construction as an example means of achieving 10 to 20dB reduction in noise levels. Should this measure be secured to reduce noise and vibration effects on bird species in Kent?</p>	SCC Ecology has no comments to make on this matter as this question refers to the section of the cabling in Kent.
2ECOL43.	Local Authorities	<p><b>REAC provision B14</b></p> <p>The REAC [REP4-235] explains that a precautionary method would be followed “when undertaking vegetation clearance potentially suitable for dormice”. Comment on whether this provision should specify particular locations or the process for establishing ‘potentially suitable’ vegetation.</p>	<p>This precautionary approach regarding impacts of vegetation clearance regarding dormice is welcome. Areas of habitat suitable for dormice should have been identified during the Phase 1 Habitat surveys of the order limits.</p> <p>Locations of note in the Suffolk onshore scheme are in and around Benhall Bridge, where there are two ambiguous (and historic) records of dormouse nests in the vegetation along the railway embankments in this location. Any vegetation clearance works required in the vicinity of Benhall Bridge should be subject to an assessment of the suitability of the habitat for dormice.</p>
2ECOL44.	Local Authorities	<p><b>REAC provision B18</b></p>	This question refers to the Minster Marshes site in Kent, therefore SCC Ecology have no comments to make.

ExQ2	Question to:	Question:	SCC Answer:
		<p>Confirm whether provision B18 of the REAC [REP4-235] provides sufficient detail to provide certainty regarding eel mitigation measures. Is any additional construction mitigation for eel required during eel migration periods in addition to the measures identified in the REAC for Minster Marshes and if not, why not?</p>	
2ECOL48.	Local Authorities, NE	<p><b>REAC provision B55</b></p> <p>Are the local authorities and NE satisfied with the commitment in REAC [REP4-235] provision B55 to “making the lines visible in adverse weather or low light conditions” or should specific reference be made to night time? The ExA has considered the applicant’s response to ISH2 AP24 [REP4-086] but considers that based on plain English, ‘low light’ may not be inclusive of the night period.</p>	<p>No overhead lines will be constructed as part of the onshore scheme in Suffolk – no comments.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>5 Water Environment</b>			
2WE1.	Applicant, SCC, KCC, EA	<p><b>Water environment - joint position statement</b></p> <p>Notwithstanding previously submitted documents, representations and statements of common ground, the ExA requires a joint position statement on areas of agreement and differences with respect to meeting the relevant policy requirements in the National Policy Statement (NPS) EN1 regarding:</p> <ul style="list-style-type: none"> <li>• Flood risk and assessment</li> <li>• Compliance with the objectives of the Water Framework Directive</li> <li>• Sequential and Exception test (in answering clearly set out all reasonings relating to NPS EN1, paragraph 5.8.42)</li> </ul>	SCC has relayed its relevant positions to the Applicant to be submitted in its submissions at Deadline 5. These positions reflect SCC's response to AP81 and 86 from ISH 2 [REP4-150].

ExQ2	Question to:	Question:	SCC Answer:
2WE2.	SCC, EA	<p><b>Need to relocate temporary drainage pond out of fluvial flood zone 3 in Suffolk</b></p> <p><b>SCC and EA:</b> Do the parties accept the applicant's response to AP85 [REP4-086], which concludes it is not necessary to relocate the particular drainage pond, or if not why not?</p>	<p>The LLFA do not agree with the response provided by the applicant in AP85 [REP4-086]. In the LLFA's opinion, it is not good practise, to site critical surface water drainage infrastructure, even of a temporary nature within areas predicted to be at flood risk. Therefore, the temporary basin should be relocated to an area within flood zone 1 ideally, or worse case flood zone 2.</p>
2WE4.	Applicant, SCC	<p><b>River Fromus crossing - bridge soffit height</b></p> <p>The EA has identified proposed wording for a requirement in response to ISH2, Action Point 77 [REP4-185] to ensure that the River Fromus Crossing does not impact Water Framework Directive macro invertebrates. Can the parties confirm if they are in agreement with the proposed wording, or if not, why not?</p>	<p>SCC Ecology are happy to defer to the guidance provided by the Environment Agency regarding this particular matter.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>8 Traffic and Transport</b>			
2TT1.	Applicant, KCC, SCC	<p><b>Junction modelling</b></p> <p>It is understood that some of the junction modelling is set to be submitted at DL6. However, given the remaining time within the examination period after DL6, the ExA requests this information at DL5. If this is not possible then explain why this is the case and update on progress.</p>	<p>SCC is still waiting for junction modelling data from the applicant. SCC's position remains as before, please refer to sections 11.106 – 11.124 from our Local Impact Report submitted at Deadline 1.</p> <p>The accesses/junctions of particular concern to SCC which should be considered for modelling are detailed in Appendix A of [REP3-101].</p>
2TT3.	Applicant, SCC	<p><b>Journey time analysis</b></p> <p>The ExA requests that SCC and the applicant work together to identify if any journey time analysis should and could be produced within the remaining examination period, such as for the A12 for example. Is there data that SCC has, such as a Strategic Transport Model, which could help with this exercise</p>	<p>Some journey time analysis was undertaken for SZC as part of the Consolidated Transport Assessment. SCC does not have access to the data used for this analysis.</p> <p>SCC does have a strategic transport model but would need to commission its consultants to undertake any study on any change to journey time across the network and would welcome a joint approach with the applicant to do so. Such an exercise would need to be commissioned urgently if the outputs were to be available to inform the Examination and the Applicant is therefore urged to engage with SCC as a priority. Care would need to be taken in selecting relevant routes and determine the</p>

			impacts of each NSIP noting the difficulties of identifying the worst case cumulative impact(s) of these projects.
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ExQ2	Question to:	Question:	SCC Answer:
2TT4.	SCC, ESC	<p><b>Alternative Abnormal Indivisible Load (AIL) route</b></p> <p>The applicant has presented an Option 3 [REP4-101] which would avoid use of Benhall Railway Bridge for the transformer AIL deliveries. Provide comments on Option 3 and its route.</p>	<p>Option 3, the routing of AILs in the same way as SPR EA1(N) and EA2 has not been secured as a ‘certain’ route requiring assessment of a number of highway structures for special order movements (e.g. river bridges on the B1069 in Knodishall / Coldfair Green and B1121 Friston). SCC notes that Sealink propose routing AILs via internal haul roads but that this may require additional aggregate to do so and that SPR avoided this by routing special order movements to the new access on the B1121 north of Friston. The route via the B1122/B1069 crosses level crossings at Abbey Road (SZC GRR) and Station Road, Leiston, passes under a footbridge on Park Lane and is required to traverse a narrow section on Haynings Road although these were not considered significant obstructions in the EA1(N) / EA2 examination. Use of the A12 and B1122 as far as Lovers Lane would need to be timed to avoid conflicts with SZC and SPR construction traffic.</p> <p>SCC would dispute the use of the term ‘certainty’ with regard to option 3 as the structures on these routes have not been assessed for special order movements and there are restrictions on some of the structures for STGO movements. For details see SCC response to [REP4-061].</p>

			<p>The Applicant needs to undertake further review, inspection and assessment of structures on the option 3 route to evidence to the LHA that it is acceptable. At the moment, the option is not acceptable for vehicles of STGO2 and above and specifically not for special order movements. It may be that the process can confirm the current assessments are conservative and can be relaxed or that there are specific issues with the structure requiring a weight or other restriction. Note that the process is dynamic as structures can deteriorate with age or increased loading at an unpredictable rate.</p> <p>The Applicant has not assessed any structures on the A12 to demonstrate that special order movements can even get to the study area and use option 3.</p> <p>Therefore option 3 is not possible for AIL movements greater than STGO1 (in terms of weight) at present.</p>
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2TT7.	Applicant, All County and District Councils	<p><b>Caps on HGVs</b></p> <p>If there are no caps on HGVs using certain routes, then would there be any enforcement possible for the County or District Councils if it transpired that there were more HGVs using certain routes than anticipated in the ES assessment, including cumulatively with other projects? For the Councils, is there a concern that capping HGV movements may displace them to other more sensitive routes with adverse impacts or that it could elongate the construction programme.</p>	<p>SCC concurs with the premise of Q2TT7, namely that merely because a development during its construction phase generates more HGV traffic, either in total or on particular routes than was anticipated in the ES, that would not in itself give rise to any scope for enforcement. The only way that enforcement is possible is if a specific numerical limit is imposed in the DCO, whether by a Requirement or by a control document tied to a Requirement, so that there would be a breach of the terms of the DCO if that limit was exceeded. SCC supports caps for HGVs on specific routes as was considered appropriate for SZC and SPR EA1(N) / EA2. In the authority's opinion the implementation of HGV caps fixes a worst-case assessment and cannot see why such a commitment would be a constraint on development as the quantities are determined by the applicant (as derived from the assessment in the ES).</p> <p>Traffic surveys undertaken do indicate that local traffic does change routing, for example the main construction route via the B1122 to SZC is operating at less than the Early Years forecast whilst that on the A1094 / B1069 is higher potentially reflecting the strict speed enforcement at the latter. Local communities have raised concerns of traffic displaced from the A12 north of Yoxford onto other routes such as the B1125. There is evidence that whilst the total volume of traffic does not increase there are</p>
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			<p>changes in peak flow with a tidal movement towards Leiston in the am peak and away in the pm peak. The table attached shows some of the changes in traffic flows in the area although this needs further work. SCC considers that the issue of displacement can be best addressed by ensuring that the relevant control document imposing the HGV caps includes a requirement for periodic monitoring and adaptive management to address any adverse consequences that are then found to have arisen. However, the risks associated with displacement are not a good reason to exclude the specification of HGV caps.</p>
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Transport information HVA - Documents - Sizewell C - All Documents

		Consolidated Transport Assessment			Traffic Survey Data																
		Baseline 2015	Reference Case 2023	Cumulative EY (S2C&SPR) 2023	Oct-24			Apr-25			Aug-25			Oct-25							
Survey EA ref	Site	AAWT	AAWT	AAWT	AAWT	daily HGV	am weekday peak	pm weekday peak	AAWT	daily HGV	am weekday peak	pm weekday peak	AAWT	daily HGV	am weekday peak	pm weekday peak	AAWT	daily HGV	am weekday peak	pm weekday peak	
G	A1094 W Snape Crossroads	7550	8600	<b>9350</b>																	
20	A1094 E Snape Crossroads				9650		806	877	1199		858	921	1199		905	1121					
22 AH	B1122 Middleton Moor	3450	4150	<b>5350</b>	3233		334	301	3555		372	336					3747			417	350
24 F	B1125 Westleton	2400	2700	<b>3400</b>	3423		339	377	3183		359	366	1119		389	460	3253			379	371
25 C	B1119 between Saxmundham and Leiston	3750	4800	<b>5300</b>	3698		317	351	4256		348	386	4436		386	459	4647			401	427
31	B1121 north of A12 Benhall								3567		308	325	3597		287	348	3575			295	332
36 D	B1069 Coldfair Green	5400	6350	<b>7200</b>					1199		788	729	7996		629	670	1199			751	734

ExQ2	Question to:	Question:	SCC Answer:
2TT8.	SCC, Applicant	<p><b>Benhall railway bridge works</b></p> <p>Would SCC have control over when the works to Benhall railway bridge would be undertaken (if the strengthening works were to be done); and also, would SCC have control over any diversion routes if the Benhall railway bridge was closed for a time for these works?</p>	<p>SCC would require all diversion routes to be approved by the authority, primarily as the organisation has better local knowledge of the network and potential impacts although the applicant will remain responsible for the design of the signage and consultation. An example would be the proposed diversion for the Benhall Bridge which uses Chantry Road / Mill Road which is single lane through the traffic signals, crosses a level crossing and joins Rendham Road on a slope. The alternative via the B1121 High Street / B1119 Fairfield Road is also restricted passing under the rail bridge. In terms of timing SCC would rely on the permit system and the applicant's duty of co-operation with other stakeholders including Network Rail to control timing of any works on the Benhall Bridge.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>9 Air Quality</b>			
2AQ2.	Local Authorities, Applicant	<p><b>Appendix A Air Quality Technical Note [REP4-241]</b></p> <p><b>Local authorities:</b> Provide comment on the technical note. Applicant: Confirm whether the high predicted NOx process contributions identified in Table A.7 maximum impact scenario could indicate any potential for exceedance of the hourly limit values for NO2 and if so, what further analysis or mitigation might be required in respect of the Kent or Suffolk converter station sites to address human health issues? Applicant to also re-provide appendix tables A.8 and A.9 with headings that are aligned with columns as the tables are difficult to read as presented.</p>	Public Health have reviewed the Technical Note, and the applicant appears to have demonstrated how the advice from Natural England has been considered. However, it is worth noting that Public Health review any documentation from a health perspective only and do not have the technical expertise to comment on air quality modelling etc and so will defer to the technical expertise of East Suffolk Council.
2AQ3.	Local Authorities	<p><b>Outline Air Quality Management Plans (oAQMP)</b></p> <p>Are any further changes required to the outline AQMP [REP3-052] and [REP3-054] to take account of the amended order limits as part of the change request?</p>	Due to the increased proximity of the works, resulting from the revised order of limits, Public Health would like confirmation that monitoring will be undertaken by the additional residential properties and in particular the residential park homes.

			<p>Park homes, due to their construction, are more susceptible to the impacts of poor air quality. To protect the health of those residents we would like monitoring to be undertaken to enable additional mitigation to be put in place should monitoring identify elevated levels or sustained impacts.</p> <p>Other than this Public Health are satisfied with the monitoring and mitigation identified in the outline AQMP and require no further changes.</p>
2AQ4.	Applicant, Local Authorities	<p><b>Operation and maintenance air quality controls</b></p> <p><b>Applicant:</b> SCC's LIR paragraph 12.23 [REP1-130] suggests that it is vital for appropriate mitigation to be put in place to minimise operation and maintenance air quality impacts from major works. The applicant's comments on SCC's LIR [REP2-026] simply states that it notes SCC's comments. Provide an appropriate mechanism within the applicant's suite of control documents to control operation and maintenance works emissions or explain why this is not required.</p> <p><b>Local authorities:</b> To comment.</p>	<p>Public Health have no additional comments to make on this matter.</p>

ExQ2	Question to:	Question:	SCC Answer:
2AQ5.	Applicant, Local Authorities	<p><b>REAC provision AQ11</b></p> <p><b>Applicant:</b> Update REAC [REP4-235] provision AQ11 to specify a minimum 120m offset from Sandwich Bay to Hacklinge Marshes SSSI consistent with the proposed mitigation in the applicant's updated air quality assessment [REP4-241].</p> <p><b>Local authorities:</b> Suggest wording for a requirement to ensure that a 120m offset is secured between the generators and the SSSI.</p>	SCC defers to the wording proposed by ESC as the relevant authority on these matters in Suffolk.

ExQ2	Question to:	Question:	SCC Answer:
<b>10 Noise and Vibration</b>			
2NV1.	Local Authorities	<p><b>Operational noise and vibration</b></p> <p>Suggest draft wording for operational noise and vibration requirements in respect of the detailed converter and substation designs that sets limits for operational noise at specific receptors and a mechanism for agreeing the final acoustic design</p>	<p><i>Public Health</i></p> <p>Public Health note that the drafting of specific operational noise and vibration limits, the identification of appropriate receptor-specific criteria, and the mechanism for agreeing final acoustic design are technical environmental protection matters. These fall within the technicality speciality of the District Councils Environmental Health Officers, particularly in relation to noise assessment, application of relevant standards, guidance and enforcement under statutory nuisance provisions. Public Health therefore defer to Environmental Health colleagues on the detailed wording of operational noise and vibration requirements.</p>
2NV3.	Local Authorities	<p><b>s61 controls</b></p> <p>Suggest an alternative form of wording for the outline Construction Noise and Vibration Management Plan (oCNVMP) s61 controls or a suitable requirement to secure s61 controls for specific construction activities.</p>	<p><i>Public Health</i></p> <p>These matters fall within the professional remit of the District Councils Environmental Health Officers, who are the enforcing authority. Public Health defer to Environmental Health colleagues on the drafting of alternative wording to secure Section 61 controls for specific construction activities.</p>

ExQ2	Question to:	Question:	SCC Answer:
<b>12 Onshore Cumulative Effects (intra-projects)</b>			
2CEIntra1	All Councils	<p><b>Mitigation of intra-project cumulative effects</b></p> <p>Do you consider that further mitigation measures are required to mitigate significant intra-project cumulative effects in addition to those already identified by the applicant? If yes, explain what specific additional measures should be considered. In answering identify the specific significant cumulative effects that the mitigation is considered to address, how it accords with appropriate planning tests and how it could be secured? If it is to be secured in the DCO, provide suggested wording</p>	<p><i>Public Health</i></p> <p>Public Health considers that further mitigation is required in respect of intra-project cumulative effects on community mental health and wellbeing arising from the combined and prolonged interaction of construction activities and associated impacts, including extended working hours, repeated access disruption, noise, vibration and progressive landscape change throughout the delivery of the Project. While individual effects may not reach significance in isolation, their temporal overlap and sustained nature over the construction period have the potential to give rise to chronic stress, sleep disturbance, reduced opportunities for respite and diminished quality of life, particularly for older residents and others who may be more sensitive to environmental change.</p> <p>The current mitigations do not adequately address this cumulative pathway, nor do they offer a structured mechanism to detect and respond to emerging wellbeing impacts. Additional mitigation should therefore include a restriction of core construction hours to Monday–Friday</p>

			<p>08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working except where agreed in advance with the relevant planning authority, together with a requirement for a proportionate Mental Health and Wellbeing Monitoring Plan covering construction and early operation.</p> <p>These measures should be secured through requirement attached to the DCO.</p> <p>Mitigations are required to address cumulative impacts identified in [APP-059], where no specific measures are currently confirmed. A robust mitigation strategy should be secured through the DCO and embedded in the CEMP, with design and monitoring undertaken in partnership with affected communities. This must include participatory engagement and adaptive monitoring throughout construction, operation, and decommissioning to ensure timely response to emerging wellbeing risks. The Applicant should seek to coordinate with the promoters of nearby projects to minimise cumulative impacts.</p> <p><i>Public Rights of Way</i></p> <p>Fromus Bridge</p> <p>If a permanent bridge over the river Fromus is provided due to the haul road, a new PROW should be provided to allow non-motorised links between the converter station, local communities and new housing allocations. To provide</p>
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			<p>routes for commuters to the converter and southern west/east links for Saxmundham. It is not sufficient to provide this as a permissive route as opposed to a PRow to future proof the route for public amenity for users.</p> <p>Public Rights of Way (PROW) are legally protected, permanent public highways over private land (footpaths, bridleways), shown on definitive maps and maintained by councils. Permissive routes are voluntary, non-permanent paths opened by landowners, often with restricted access (e.g., no bikes) and can be closed at any time without legal process. This is not an enhancement or protection of the public network for amenity.</p> <p>B1119 bridleway.</p> <p>New PROW (bridleway, to allow cycling and horses) along B1119 to run east/west from Saxmundham to the east, to link to other PRow, or highway, to mitigate the impact of the user experience of the diverted footpath Saxmundham E-460/023/0 and Sternfield E-491/006/0. The permanent diverted route will be located close to the new converter station and the landscaping will not screen the buildings from the PROW user and will detrimentally impact on public amenity. Even when the planting is mature, it may not screen adequately to mitigate the impact. Setting a new route further to the north and on higher land, any</p>
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			<p>planting will be more of a screen to the buildings and be a more positive impact on amenity. This will also provide an off-road route for non-motorised highway users, for both local communities, visitors and employees.</p> <p>The above routes should not be promoted as permissive routes and should be made Public Rights of Way to future proof for public amenity for users.</p> <p>Public Rights of Way (PROW) are legally protected, permanent public highways over private land (footpaths, bridleways), shown on definitive maps and maintained by councils. Permissive routes are voluntary, non-permanent paths opened by landowners, often with restricted access (e.g., no bikes) and can be closed at any time without legal process. This is not an enhancement or protection of the public network for amenity.</p> <p>Aldeburgh footpath</p> <p>[APP-059] paragraphs on Public Rights of Way and users' pages 8, 9 and 18 recognises that there will be significant impact during construction and use due to cumulative effects. No mitigation has been confirmed at this stage. The enhancement proposals put forth by SCC may be relevant to this receptor when considering SCC's argument made during ISH 2 and within [REP4-150] that PROW enhancement can be relevant in planning terms even if the enhancement is not in close proximity to the given receptor</p>
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			<p>when considering the interaction of the wider PRoW nexus in relation to an affected PRoW receptor. SCC has also detailed what changes it considers necessary to be included in the outline PRoW management plan in table A6 of [REP2-062] which would commit the Applicant to keep PRoWs open as far as possible and give PRoW users priority whilst maintaining safety standards.</p> <p>Restriction of Core Construction Hours.</p> <p>Restriction of core construction hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working except where it is agreed in advance with the relevant planning authority, to give respite to PROW users. This will give all legal users of the PROW days with no active construction. Especially horse riders, who will have little respite from noise and flashing lights etc.</p>
<p>2CEIntra2</p>	<p>All Councils</p>	<p><b>REAC commitment to review / mitigate significant intra-project cumulative effects</b>                  Having regard to the applicant’s response to AP112 [REP4-086], can all Councils confirm if they agree with the suggested commitment wording for the REAC (and subsequent approval through discharge of requirement 6 via relevant management plans) to review</p>	<p><i>Planning</i></p> <p>SCC welcomes the principle of reviewing whether significant intra-project cumulative effects are still likely to occur following the detailed design stage and exploration of additional mitigation measures. However, following the mitigation hierarchy, if there are no appropriate mitigation measures available, offsetting measures must be explored</p>

		<p>intra-project cumulative effects and establish what additional mitigation measures could be applied to reduce their significance? In answering, summarise any remaining concerns, if you consider it should be secured in the DCO provide suggested text.</p>	<p>and implemented where possible. In addition, the commitment proposed by the Applicant in GG40 of the REAC [REP4-234] needs to include a mechanism for implementing the additional measures once agreed by the relevant local authorities. SCC has made detailed submissions proposing potential offsetting measures in relation to significant effects on PRoWs, for instance. SCC considers that more detail should be given at this stage regarding what mitigation/offsetting measures may be implemented as part of this commitment as they are relevant to making the development acceptable in planning terms. At present, SCC has no assurance that there are mitigation/offsetting measures available which will be implemented by the Applicant should significant effects remain likely once the review required by the proposed commitment has been carried out. Therefore, the commitment should include reference to potential mitigation measures which are available to be implemented should likely significant effects remain. These details can be inserted into the outline management plans relevant to the likely significant intra-project cumulative effects. The commitment should also require the Applicant’s review to be reviewed and agreed by the relevant local authorities through the relevant management plans within Requirement 6. Appropriate text should be included in the relevant outline plans to secure</p>
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			<p>this. The proposed REAC commitment could be reworded as follows:</p> <p><i>‘Once detailed design is complete and detailed construction and programme information is available, the undertaker commits to undertaking a review of the intra-project cumulative effects assessment submitted with the application (as amended during the Examination) in collaboration with the relevant local authorities to consider:</i></p> <ul style="list-style-type: none"> <li><i>a) if the significant intra-project cumulative effects are still considered likely to occur; and</i></li> <li><i>b) if they are still considered likely to occur, what additional appropriate mitigation measures may be applied to reduce their significance; and</i></li> <li><i>c) if no such mitigation measures are available, what additional appropriate offsetting measures may be applied following the mitigation hierarchy.</i></li> <li><i>d) any such mitigation or offsetting measures must be agreed with the relevant local authorities, including a timetable for their implementation, and once agreed shall be implemented in accordance with the terms of such timetable.’</i> <p><i>Public Health</i></p> </li></ul>
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			Public Health recommend that the Applicant's commitments are strengthened to include mitigation for intra-project cumulative effects on community health and wellbeing arising from the prolonged interaction of construction activities. This should include restriction of core construction hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working except where otherwise agreed in advance with the relevant planning authority together with a requirement of a proportionate Mental Health and Wellbeing Monitoring Plan covering the construction period and early operation.
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ExQ2	Question to:	Question:	SCC Answer:
2CEIntra3	All Councils	Quantification of significance of effects Having regard to the applicant's response to AP111 [REP4-086], can all Councils confirm if they agree with the applicant's stated position regarding quantification of magnitude/degree of significance of effects in cumulative (intra-project) assessments on residential properties and how the various effects interact with each other?	It should be noted that the issue of magnitude of significance of intra-project cumulative effects applies to other receptors such as PRoWs which are not addressed in the Applicant's response to AP111. SCC offered its own views on this in response to 1CEIntra 2 of ExQ1 [REP3-101].  Whilst SCC appreciates the further review undertaken by the Applicant, the Applicant has not provided evidence detailing this review demonstrating how it came to its conclusions. This is particularly important due to the role

		<p>In answering:</p> <ul style="list-style-type: none"> <li>• explain if you agree with the conclusion that if any significant effects on residential receptors were to occur, they would be likely to be moderate not major?</li> <li>• set out if there are any other concerns regarding possible significant effects on non-residential receptors (including road, public rights of way and recreational users) and how any specific significant cumulative effect could be mitigated, how that accords with appropriate planning tests and could be secured?</li> </ul>	<p>of professional judgement cited by the Applicant in making these conclusions which cannot be verified by SCC due to the lack of appropriate detail. On matters such as noise, SCC defers to ESC as the relevant local authority, aside from its relevance to public health.</p> <p>Regarding non-residential receptors, SCC’s view remains unchanged from that detailed in response to 1CEIntra2 of ExQ1 [REP3-101]. Without further detail demonstrating otherwise, SCC considers a precautionary approach should be taken which considers the degree of effect to be major rather than moderate. In what follows, technical detail is given further to SCC’s position.</p> <p><i>Public Health</i></p> <p>The Applicants response refers to further work undertaken to review the potential significant intra project effects reported in [APP-059].</p> <p>Public Health notes that Table 12.2 of [APP-059] identifies combined significant effects for some residential receptors under Friston Scenario 2 during construction, operation and decommissioning, with no mitigation currently proposed. The same conclusions are applied for Transport and users, Public Rights of Way and users, Recreational Receptors and Communities and human</p>
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			<p>health during construction, operation/maintenance and decommissioning.</p> <p>Public Health considers that the conclusions reached are optimistic and not precautionary. Furthermore, in practice, the interaction of effects when combined may reasonably result in additional or exacerbated effects on the receptors, beyond the individual effects as defined.</p> <p>Public Health notes the additional cross topic workshop and GIS based review undertaken by the Applicant and recognises that the approach reflects a professional judgement led assessment rather than a property-by-property quantitative exercise. Public Health consider that the methodology described remains largely unfocused and receptor focused and does not fully capture or articulate how prolonged duration, temporal overlap and repeated exposure to multiple stressors were weighted in determining overall magnitude. From a public health perspective, these factors are central to understanding cumulative effects on wellbeing. Public Health does not have evidence to conclude that effects would necessarily be “major”, however, the conclusion that effects would be limited to moderate significance appears to rely on optimistic assumptions regarding duration, resilience and adaptive capacity. A precautionary interpretation would recognise greater</p>
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			<p>potential for adverse cumulative outcomes where stressors interact over extended periods.</p> <p>Lengthy working hours, intermittent but persistent noise and vibration, access disruption, and reductions in visual amenity has the potential to erode predictable respite periods and to heighten stress and fatigue within affected communities over time. In this context, Public Health does not disagree that effects may fall within a moderate significance band but maintains that this does not diminish their material public health relevance or the need for targeted mitigation. Public Health therefore reiterates that commitments should address cumulative health and wellbeing impacts arising from the interaction of construction effects, and that mitigation must be proportionate, enforceable and aligned with appropriate planning tests. This should include restrictions on working hours and monitoring of mental health and wellbeing.</p> <p><i>Public Rights of Way</i></p> <p>Restriction of core construction hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working except where it is agreed in advance with the relevant planning authority, to give respite to PROW users. This will give all legal users of the PROW days with no active construction. Especially horse</p>
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			<p>riders, who will have little respite from noise and flashing lights etc.</p> <p>New PROW (bridleway, to allow cycling and horses) along B1119 to run east/west from Saxmundham to the east, to link to other PROWs, or highway, to mitigate the impact of the user experience of the diverted footpath Saxmundham E-460/023/0 and Sternfield E-491/006/0. The permanent diverted route will be located close to the new converter station and the landscaping will not screen the buildings from the PROW user, and will detrimentally impact on public amenity. Even when the planting is mature, it may not screen adequately to mitigate the impact. Setting a new route further to the north and on higher land, any planting will be more of a screen to the buildings and be a more positive impact on amenity. This will also provide an off-road route for non-motorised highway users, for both local communities, visitors and employees.</p> <p>[APP-059] paragraphs on Public Rights of Way and users pages 8, 9 and 18 recognises that there will be significant impact during construction and use due to cumulative effects. No mitigation has been confirmed at this stage.</p> <p>If a permanent bridge over the river Fromus is provided due to the haul road, a new PROW should be provided to allow non-motorised links between the converter station,</p>
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			<p>local communities and new housing allocations. To provide routes for commuters to the converter and southern west/east links for Saxmundham.</p>
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ExQ2	Question to:	Question:	SCC Answer:
2CEIntra4	All Councils	<p><b>REAC mitigation commitments (GG27, GG03, NV03)</b></p> <p>In responding to AP112 [REP4-086] the applicant has set out initial comments regarding REAC commitments GG27, GG03 and NV03? Can the identified Councils confirm if they agree with the applicant's position / proposed amendments, or if not provide details of the additional changes you consider necessary?</p>	<p><i>Public Health</i></p> <p>GG27 - Public Health consider that proactive community liaison is a necessary component of managing cumulative effects. However, as drafted, GG27 remains largely reactive. Logging complaints does not in itself mitigate cumulative wellbeing impacts unless accompanied by defined response times, escalation procedures and a clear trigger for reviewing construction practice where patterns of complaints emerge. It is recommended the commitment should include regular scheduled community updates (not solely activity requested notifications), define timescales for response to complaints and a mechanism requiring review of working practices where repeated complaints indicate emerging cumulative impacts.</p> <p>GG03 - The appointment of an Environmental Manager and ECoW is supported as a reasonable governance mechanism. We do note however that the current wording focuses on compliance monitoring rather than adaptive and proactive mitigation of cumulative effects. For this measure to address intra-project cumulative health impacts, it should require the ECoW to review patterns of environmental effects in combination, and to</p>

			<p>advise on additional mitigation where sustained or overlapping impacts are identified.</p> <p>Public Health consider NV03 to be the most substantive opportunity for proactive mitigation, as it provides for reassessment and site-specific control. The current drafting refers only to “<i>new or different significant adverse effects</i>” at individual receptors and does not address cumulative or prolonged exposure. The measure would be strengthened by requiring the detailed construction noise and vibration assessment to consider temporal overlap, duration and repeated exposure at receptors, and to identify additional mitigation where cumulative construction effects may contribute to sustained community stress or sleep disturbance. Reference to intra-project cumulative effects would improve clarity and robustness.</p> <p>Public Health recommend that the Applicant’s commitments are strengthened to include mitigation for intra-project cumulative effects on community health and wellbeing arising from the prolonged interaction of construction activities. This should include restriction of core construction hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working except where otherwise agreed in advance with the relevant planning authority together with a requirement of a proportionate Mental Health and</p>
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			Wellbeing Monitoring Plan covering the construction period and early operation.
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ExQ2	Question to:	Question:	SCC Answer:
<b>13 Onshore Cumulative Effects (Inter-projects)</b>			
2CEInter 1.	All Councils	<p><b>Mitigation of inter-project cumulative effects</b></p> <p>Do you consider that further mitigation measures are required to mitigate significant inter-project cumulative effects in addition to those already identified by the applicant. If yes, explain what specific additional measures should be considered. In answering identify the specific significant cumulative effects that the mitigation is considered to address, how it accords with appropriate planning tests and how it could be secured? If it is to be secured in the DCO, provide suggested wording</p>	<p>SCC considers further mitigation is necessary for adverse effects related to Health and Wellbeing, Traffic and Transport, Socioeconomics and Tourism, the National Landscape and Public Rights of Way. Within these areas, there are several effects which the Applicant has concluded are not significant; however, SCC and other IPs have made representations throwing doubt on the validity of these conclusions both by criticising the robustness of the assessments and providing evidence/reasoning to the contrary of those conclusions. In any case, SCC considers that significant uncertainty remains regarding the eventual magnitude of cumulative effect on various receptors. In this case, SCC proposes that robust monitoring, reporting and adaptive management measures should be put forth as part of a collaborative approach with the relevant local authorities to determine magnitude of effect during construction and operation and identify potentially appropriate mitigation measures.</p> <p>In what follows, detail is given on each relevant ES topic justifying and proposing what should be secured consisting of a combination of mitigation to be confirmed at the planning stage and commitments to identify mitigation during delivery should it be necessary utilising robust monitoring and reporting practices.</p>

			<p>These measures should be implemented into the relevant management plans.</p> <p><i>Highways</i></p> <p>With the uncertainties of when and what the worst case inter project impacts will be SCC would consider that an appropriate measure would follow a process of monitoring, reporting and enforcement of measures secured through requirements or management plans together with a formal commitment from the applicant to contribute in proportion to any additional mitigation identified if the cumulative impacts exceed those assessed by the applicant. In transport terms this could follow a similar methodology for the SZC continent fund secured in the Deed of Obligation (Schedule 16).</p> <p><a href="https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-008240-SZC%20Co.%20-%20Final%20signed%20and%20dated%20s.106,%20final%20s.106%20Explanatory%20Memorandum%20and%20final%20Confirmation%20and%20Compliance%20Document%208.pdf">https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-008240-SZC%20Co.%20-%20Final%20signed%20and%20dated%20s.106,%20final%20s.106%20Explanatory%20Memorandum%20and%20final%20Confirmation%20and%20Compliance%20Document%208.pdf</a></p> <p>Specific areas where the authority considers mitigation to be necessary are:</p> <p>B1121 Benhall: Improvements to footways and provision of safe crossing points for pedestrians and cyclists to reduce fear, anxiety, severance</p>
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			<p>and improve amenity both as an individual project and in combination with LionLink. These can be secured by inclusion as numbered works within the dDCO, defined work in the OCTM&amp;TP or a contribution agreed with the authority (i.e. s106).</p> <p><b>B1121/B1119 junction Saxmundham:</b>                  In this case the impact of construction traffic to and from the east side of the River Fromus bridge construction site is of the greatest concern. The signalling has been updated recently, and the geometry restricts major design changes. Avoidance of traffic through this junction through suitable approved caps on number and timing would be the preference with a commitment to review signal phasing if considered to provide any benefit to reducing delay.</p> <p><b>A1094/B1069 Corridor:</b>                  The cumulative impacts of a number of NSIPs have exceeded that forecast (i.e. SZC consolidated transport assessment) and the addition of Sea link traffic will exacerbate these impacts. Junction modelling and a review of the cumulative environmental impact of all projects may indicate additional mitigation is necessary. If mitigation is identified by further study, then it could be included as for the B1121 Benhall mitigation or alternatively a mechanism for monitoring to identify cumulative impacts secured as described above.</p> <p><b>A12/B1119 Junction:</b></p>
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			<p>In SCC’s view the additional Sea link traffic through this junction increases the risk of collisions whether or not used as a diversion route. The matter is complicated by the proposed residential development south of Saxmundham which is likely to have a greater impact. In these circumstances a proportional contribution to junction improvements would be suggested with a backstop of inclusion within the mechanism of managing unforeseen impacts through a contingent fund / agreement. Comments on the potential impacts of Sea link construction traffic on junctions on the A12 were detailed in Appendix A of [REP3-101].</p> <p><i>Public Health</i></p> <p>Public Health considers that further mitigation is required in respect of significant interproject cumulative effects, particularly where the Sea Link proposals coincide temporally and geographically with other major energy and infrastructure developments in Suffolk. The interaction of construction activities across multiple projects has the potential to amplify pressures on community mental health and wellbeing through extended periods of elevated noise, traffic disruption, constrained access, workforce related activity, and progressive landscape change. Whilst the applicant has identified project specific measures, these do not sufficiently address the combined effects experienced by communities exposed to</p>
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			<p>overlapping construction programmes, nor do they provide a mechanism to detect and respond to emerging cumulative wellbeing impacts. Public Health therefore maintains that additional mitigation, specifically, restricting core working hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00 with no routine Sunday or Bank Holiday working, except by prior agreement with the relevant planning authority, alongside the requirement for a proportionate Mental Health and Wellbeing Monitoring Plan covering construction and operation remains necessary to manage cumulative risk. This should also include commitments to implement appropriate measures to mitigate adverse effects where possible according to the results of monitoring.</p> <p>Another aspect which bolsters the necessity of a monitoring plan is potential adverse cumulative effects on vulnerable groups. The Applicant’s consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060] and [APP-058]. SCC is aware that a new SEND school will open in close proximity to the B1121 and the Applicant’s permanent access road<sup>2</sup>. Consideration of how this vulnerable group, as well as this specific receptor, will be</p>
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<sup>2</sup> See <https://www.bbc.co.uk/news/articles/cq6ve4e1n78o>

			<p>affected is therefore essential. For instance, members of certain vulnerable groups may be more susceptible to noise and vibration effects and the effects of high levels of HGVs due to the different ways sensory inputs affect them. It is therefore vital that effects on all vulnerable groups are considered and robustly monitored in addition to potential mitigation measures being identified.</p> <p>Such a Monitoring Plan should set out a clear framework for identifying, tracking and responding to potential community mental health and wellbeing impacts associated with prolonged or overlapping construction activity. The Plan should operate throughout construction and into the early operational phase, recognising that cumulative pressures may persist beyond the construction period where communities have experienced extended disruption. It should establish clear governance arrangements, reporting routes and defined review points with the local authorities and health system partners to enable issues to be identified early and appropriate mitigation considered where necessary.</p> <p>Public Health considers that reliance solely on publicly available general practice or primary care activity data would be insufficient, as this would capture only those individuals who actively present to services and self-report mental health concerns. A more proportionate and robust approach would involve triangulating a range of information sources to provide a broader understanding of community wellbeing trends within the project area. This could include analysis of population health</p>
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			<p>management data and primary care activity trends, monitoring of referrals to social prescribing and community mental health services, and regular engagement with local primary care leads and community mental health teams to identify emerging patterns or service pressures.</p> <p>The Monitoring Plan should also include mechanisms to capture community experience directly. This may include periodic community wellbeing surveys or qualitative engagement exercises designed to understand lived experience of disruption and cumulative impacts, recognising that such methods should be carefully interpreted alongside service data to avoid response bias where views may be influenced by opposition to the Project rather than demonstrable mental health effects. In addition, clear and accessible routes should be provided for residents to raise wellbeing concerns associated with construction activity, with processes in place to record, categorise and escalate issues where patterns emerge.</p> <p>Regular reporting of monitoring findings to relevant local authority and health partnership forums would enable ongoing dialogue between the Applicant, local authorities and health stakeholders, and provide an opportunity to review whether additional mitigation or targeted community support measures may be required. Consideration should also be given to independent or academic input to support objective evaluation of emerging and cumulative impacts, drawing on relevant work undertaken locally by organisations such as Suffolk Mind</p>
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		<p><a href="https://www.suffolkmind.org.uk/reports-and-accounts/">https://www.suffolkmind.org.uk/reports-and-accounts/</a>) and University of Suffolk.</p> <p>Visitor Economy- The Sizewell C Tourism mitigation fund is a good example of an initiative acknowledging the adverse effect on a sector and taking proactive steps to work with affected businesses and their customer base on mitigating the effects of any disruption before they become an issue.</p> <p><i>Employment, skills and education</i></p> <p>SCC considers that further mitigation measures are required, as the Applicant has proposed no mitigation for cumulative skills, employment or education impacts.</p> <p>A Skills and Employment Plan (SEP) should be secured to manage cumulative skilled-labour shortages, workforce displacement and competition for labour. The plan would ensure that workforce numbers, skills and phasing are modelled clearly, enabling Suffolk’s constrained labour market to be managed in coordination with other major infrastructure projects in the region. This mitigation is necessary to manage labour-market effects identified in SCC’s policy, relevant to the workforce impacts of the development. It should be secured through a DCO Requirement obligating the Applicant to prepare and deliver the</p>
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			<p>SEP in consultation with SCC via the Regional Skills Coordination Function (RSCF).</p> <p>A Local Education and Training Strategy, embedded within the SEP, is required to mitigate cumulative pressure on Suffolk’s FE, HE and private training providers, who will need to service multiple NSIPs concurrently. Coordinated planning is essential to avoid unmet demand for critical skills and ensure inclusive access for local residents. This is necessary to address identified cumulative effects on training capacity, relevant to the project’s workforce needs. It should be secured as a mandatory SEP component within the DCO.</p> <p>A coordinated supply chain development programme is required to mitigate cumulative competition for local and regional contractors, inflationary price pressures and displacement of SMEs caused by overlapping NSIP procurement. Scenario-based assessment across hyper-local, local and regional geographies, reflecting low, medium and high participation, would ensure adequate capacity and resilience. This measure is necessary to address supply-chain displacement risks, relevant to the project’s procurement impacts. It should be secured through a DCO requirement mandating a supply-chain strategy agreed with SCC.</p> <p>Finally, governance and monitoring through the RSCF is required to mitigate the risk of uncoordinated labour-market planning across overlapping NSIPs and to enable adaptive management</p>
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			<p>as project timelines evolve. This is necessary to manage ongoing cumulative effects, relevant to the project’s workforce and training footprint. It should be secured through the DCO by requiring Applicant participation in RSCF led governance.</p> <p>Suggested DCO Requirement Wording</p> <p><i>No part of the authorised development may commence until a Skills and Employment Plan (“SEP”) has been submitted to and approved in writing by the relevant local authority, following consultation with Suffolk County Council in its role operating the Regional Skills Coordination Function (RSCF). The SEP must demonstrate how it will mitigate cumulative effects on skilled labour availability, workforce displacement, training capacity, supply-chain resilience and accommodation pressures arising from the authorised development in combination with other nationally significant infrastructure projects.</i></p> <p>The SEP must include:</p> <p><i>(a) a detailed workforce assessment for each phase of the authorised development, including workforce numbers, skill sets, role durations and the anticipated split between home-based and non-home-based labour, in order to mitigate cumulative skilled-labour shortages and workforce displacement;</i></p> <p><i>(b) a Local Education and Training Strategy prepared jointly with the RSCF, demonstrating how training pathways and provider capacity will be aligned with project needs to mitigate cumulative</i></p>
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			<p><i>pressure on Suffolk’s FE, HE and private training providers and to support inclusive access for local residents;</i></p> <p><i>(c) scenario-based cumulative workforce modelling, including a worst-case assessment consistent with Suffolk County Council’s socio-economic guidance, to mitigate cumulative impacts on accommodation, transport, local services and availability of home-based labour;</i></p> <p><i>(d) a supply-chain development strategy identifying hyper-local, local and regional opportunities, with measures to support capacity-building and mitigate cumulative supply-chain displacement linked to overlapping NSIP procurement demands;</i></p> <p><i>(e) arrangements for ongoing information-sharing with the RSCF to enable adaptive management of cumulative labour-market, training and supply-chain impacts throughout the construction phase; and</i></p> <p><i>(f) monitoring and reporting arrangements, including performance indicators for local employment, apprenticeships, training delivery, supply-chain participation and socio-economic outcomes, to ensure enforceability and ongoing assessment of cumulative effects.</i></p> <p><i>The authorised development must be carried out in accordance with the approved SEP unless otherwise approved in writing by the relevant local authority following consultation with Suffolk County Council.</i></p> <p><i>The undertaker must ensure that all contractors and sub-contractors involved in the authorised development comply</i></p>
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			<p><i>with the approved SEP, including local employment, training and supply-chain obligations.</i></p> <p><i>The undertaker must participate in governance arrangements led by the RSCF to support coordinated labour market management, information-sharing and monitoring across nationally significant infrastructure projects in Suffolk.</i></p> <p><i>Visitor Economy</i></p> <p>There is still concern that the cumulative effect of NSIPs will have a detrimental effect on aspects of the visitor economy. There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C. At the time of writing, 2000 workers are already onsite for Sizewell alone. Whilst there is 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,</p>
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			<p>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><b>Perception-</b> 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> <p><b>Practical effect on tourism businesses-</b> 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><b>Timescale.</b> 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</p>
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			<p>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><b>Marketing and publicity</b> - 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 <a href="#">Suffolk Coast Destination Management Organisation (DMO)</a> and the <a href="#">Suffolk and Norfolk Local Visitor Economy Partnership (LVEP)</a> will be useful sources of support and information.</p> <p>On a <b>wider economic point</b>, 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>
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			<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 <a href="https://suffolksupplychain.co.uk/">https://suffolksupplychain.co.uk/</a>) 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 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.</p> <p><i>Public Rights of Way</i></p> <p>Whilst no significant inter-project cumulative effects are identified within [APP-060], the assessment of several receptors rely on coordination with the promoters of cumulative developments, particularly Lion Link and EA1N/EA2, to avoid significant effects. Relevant receptors include S-P9 and S-P10 which are assessed to have potentially significant effects without coordinated measures between cumulative developments. SCC has criticised this approach given the reliance on third parties to avoid significant effects which may not be possible during project delivery should those parties not agree. SCC has criticised this approach as not representing a reasonable worst-case scenario (see A6.2 of [REP2-062]) due to the reasonable</p>
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			<p>likelihood of coordination not occurring and lack of guarantee and monitoring of its effectiveness.</p> <p>SCC gave further detail of its position on this matter in response to the Applicant’s answer to 1TT17 of ExQ1 [REP4-201] and reiterates the necessity of further mitigation measures detailed in table A6 and B3 of [REP2-062] and Chapter 11 of [REP1-130]. If direct mitigation is not feasible, then offsetting measures must be considered, examples of which were detailed in SCC’s LIR [REP1-130] and in response to 2CEIntra1 and 2CEIntra3 of this document. Therefore, SCC considers further mitigation is necessary in the scenario where coordination does not avoid significant effects and robust monitoring is needed to determine whether effects are materially different to those reported in [APP-060].</p> <p><i>Landscape and Visual</i></p> <p>SCC considers that the Applicant should have regard to the landscape proposals for SPR’s and Lion Link’ substations at Kiln Lane and for Lion Link’s landscape proposals around the converter station sites at Saxmundham. Please see more detailed comments in SCC’s Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 - Issue Specific Hearing 2 (ISH2) [REP4-150].</p>
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			SCC considers that the Applicant should actively seek to agree a masterplan at the Saxmundham site and to further enhance the proposals at Kiln Lane.
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