

SEA LINK

EN020026

Comments on Submissions received by Deadline 4

Suffolk County Council



Table of Contents

Glossary of Acronyms	2
Purpose of this Submission	3
Comments on further information/submissions received by Deadline 4	4
Table 1 – Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]	4
Table 2 – Document 6.3.2.2B (C) Appendix 2.2.B Suffolk Wintering Bird Report [REP4-037]	9
Table 4 – Document 7.5.1.1 (C) Construction Traffic Management and Travel Plan Suffolk [REP4-061]	10
Table 3 – Document 9.105 Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099].....	14
SCC General Comments	14
Table 4 – Document 9.111 (A) Applicant’s Response to Socioeconomic, Tourism and Recreation and Health and Wellbeing Submissions [REP4-100].....	17
Table 6 – Document 9.86 (A) Applicant’s Comments on Other Submissions Received at Deadline 3 and 3A [REP4-082].....	27
Table 7 – Document 9.87 (A) Applicant’s Comments on Responses to First Written Questions [REP4-083]	30
Table 8 – Document 9.89 (A) Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085].....	32
Table 9 – Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition 1 (CAH1) at Deadline 4 [REP4-086].....	34
Table 10 – Document 9.90 (A) Applicant’s Response to Action Points from Issues Specific Hearing 2 (ISH2) at Deadline 4 [REP4-086]	36
Table 11 – Document 9.91 Applicant’s Comments on Change Request (CR1) Relevant and Written Representations [REP4-089]	39
Table 12 – Document 9.112 (A) Benhall Railway Bridge [REP4-101].....	40
Table 13 – Outline Code of Construction Practice [REP4-232].....	42
Table 14 – Document 3.1 (G) draft Development Consent Order (dDCO) [REP4-217] ...	42

Glossary of Acronyms

<i>AILs</i>	<i>Abnormal Indivisible Loads</i>
<i>CAH1</i>	<i>Compulsory Purchase Hearing 1</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>

<i>ExA</i>	<i>Examining Authority</i>
<i>ISH2</i>	<i>Issue Specific Hearing 2</i>
<i>LLFA</i>	<i>Local Lead Flood Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PHM</i>	<i>Population Health Management</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>
<i>SZC</i>	<i>Sizewell C</i>

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

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written response to submissions received by the Examining Authority (ExA) at Deadline 4.

Examination library references are used throughout this document to assist readers. SCC has not sought to repeat previous representations and has instead taken an approach of providing further information where appropriate. Unless indicated otherwise, SCC considers its positions as set out in previous submissions unchanged.

Comments on further information/submissions received by Deadline 4

Ref. No	Topic	Summary of submission	SCC Response
Table 1 – Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]			
4.3.3	Hedgerow species	<p>The species mix will comprise species typically found in adjacent hedgerows and will likely comprise the following species:</p> <ul style="list-style-type: none"> - field maple (<i>Acer campestre</i>); - common hazel (<i>Corylus avellana</i>); - common hawthorn (<i>Crataegus monogyna</i>); - blackthorn (<i>Prunus spinosa</i>); and - dog rose (<i>Rosa canina</i>) 	SCC (Landscape) would ask that the word ‘comprise’ is replaced with the word ‘include’
5.2.6, 6.6.1	Native hedgerow planting	A section of native hedgerow and tree planting is proposed along the B1119 and the permanent access road (15,866 m ²).	SCC (Landscape) considers that these paragraphs require updating to reflect the latest proposals for a tree belt/woodland along this section of the B1119.
Table 5.3	Native hedgerow mix	<ul style="list-style-type: none"> - Field maple (<i>Acer campestre</i>), - common hornbeam (<i>Carpinus betulus</i>), - common hazel (<i>Corylus avellana</i>), - common hawthorn (<i>Crataegus monogyna</i>), - common dogwood (<i>Cornus sanguinea</i>), - common privet (<i>Ligustrum vulgare</i>), - blackthorn (<i>Prunus spinosa</i>) 	SCC (Landscape) queries why there are more species included for newly created hedges than for ‘Important Hedgerows’ (see comment for 4.3.3, above)

Ref. No	Topic	Summary of submission	SCC Response
5.8.1	Phasing of landscape proposals	Where planting areas do not conflict with construction compounds and activities, advanced planting (in advance of operation) will be undertaken in the first available planting season prior to or during the construction phase of work.	SCC (Landscape) queries, if planting in advance of operation can be considered to be advance planting.
6.4.3-6.4.4	Deer fencing	The Applicant considers deer fencing with badger gates, potentially taking a joint approach with Sizewell estate.	<p>SCC (Landscape) & SCC Ecology welcome the communications between Sea Link and Sizewell estate with regards to deer fencing. SCC (Landscape) considers that appropriate fencing for larger areas of planting has proven to be a successful method to protect young plants and yields good results and natural growth.</p> <p>SCC (Landscape) & SCC Ecology query however, whether this fencing should not also be made rabbit proof, as only this would, if well maintained, make individual tree and shrub guards superfluous. If rabbit fencing was added, the badger gates would need to be suitably weighted to avoid becoming rabbit gates.</p>
7.1	Pre and Post Construction Monitoring and Reporting	The Applicant sets out monitoring and reporting procedures	SCC (Landscape) welcomes the ecological surveys that are being referred to, but considers that detailed pre- and post-construction surveys and monitoring will also be required for hedgerows and trees. SCC (Landscape has pointed this out in it Local Impact Report) [REP1- 130], where it refers to further guidance being given in SCC's response to Statutory

Ref. No	Topic	Summary of submission	SCC Response
			<p>Consultation. This guidance is attached to this document as Appendix B. In short, SCC (Landscape) considers that all hedgerows and trees that would be affected by the scheme, are fully surveyed and documented, for 'Important Hedgerows, this included a written description and photographic evidence of the baseline condition needs to be provided.</p>
7.3	Adaptive Management Monitoring	The Applicant sets out its approach to adaptive management for landscape planting.	<p>While SCC (Landscape) welcomes and promotes adaptive/dynamic aftercare, based on close monitoring, SCC (Landscape) considers that adaptive management must include a temporal element. This means that for planting areas which experience a high failure rate, and require significant replacement, the aftercare programme is paused rather than progressed into the next year of the aftercare programme, until the planting has achieved the required milestones. The reason for asking this is to ensure that planting enters long-term management or is handed back to landowners well established, equivalent to five years' worth of growth.</p> <p>SCC (Landscape) considers that this principle needs to be anchored into the LEMP.</p>

Ref. No	Topic	Summary of submission	SCC Response
Appendix A	Landscape proposals	Plans and cross sections	<p><i>Figure 1 Saxmundham Converter Station Outline Landscape Mitigation, Rev B, 05/02/2026 and FIGURE 2 SAXMUNDHAM CONVERTER STATION ILLUSTRATIVE CROSS SECTIONS (SHEET 3 OF 3), Rev 1, 13/02/2026</i></p> <p>SCC (Landscape) welcomes the more robust planting along the B1119. SCC had previously asked for a 10m wide planting strip, proposed are now 8.5, and SCC would welcome further information with regards to the rationale for this.</p> <p>It is disappointing that no additional planting is proposed around the converter station site following the comments provided at ISH2. SCC disagrees with the Applicant that further planting would be inappropriate and that opportunities further minimise the effects, even within the DCO boundary are not taken, and that therefore the mitigation hierarchy is not being fully applied.</p> <p><i>FIGURE 2 SAXMUNDHAM CONVERTERSTATION ILLUSTRATIVE CROSS SECTIONS (SHEET 1 OF 3), Rev A, 05/02/2026</i></p> <p>Saxmundham Section D-D: SCC considers that clear measurements should be provided for all cross sections. Here, there are concerns that the 2m wide path sits in too narrow a grassland corridor, and that subsequently the</p>

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			<p>depth of the woodland would need to be reduced to provide an appropriate PRow corridor. Such a reduction could undermine the screening and mitigative function of the woodland.</p> <p>It would further be helpful, if the cross section could show, at least indicatively the bunding around the converter station and its effects on landscape proposals, as referred to in the Applicant's response to Action Point 40 [REP4-086]. Landform has also not been considered in the sections.</p> <p><i>FIGURE 2 SAXMUNDHAM CONVERTER STATION ILLUSTRATIVE CROSS SECTIONS (SHEET 2 OF 3), Rev A., 05/02/2026</i></p> <p>Section E-E: SCC queries why species-rich neutral grassland is proposed across the entire width of the HVDC corridor, including limits of deviation, when this could be an area for scrub planting in some areas.</p> <p>Section F-F: SCC considers the Converter station building should be shown in the section for reference of scale; measurements should be provided.</p> <p><i>Figure3 Saxmundham Converter Station Outline Landscape Mitigation-Timing of Planting, Rev B, 05/02/2026</i></p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>SCC considers this a helpful drawing. It shows, however how little advance planting will be possible. This is also connected to the lack in wider restorative and mitigative planting.</p> <p><i>Figure 5 Friston Substation Outline Landscape Mitigation, Rev C, 05/02 /2026</i></p> <p>SCC welcomes the Applicant's commitment to provide landscape planting as agreed with SPR, for the case that SPR's substations should not be built. SCC is however disappointed that HDD is not being considered to avoid and/or enable certain landscape features or consider a combination of open trench works and additional landform shaping to enable planting above cables.</p>

Ref. No	Topic	Summary of submission	SCC Response
Table 2 – Document 6.3.2.2B (C) Appendix 2.2.B Suffolk Wintering Bird Report [REP4-037]			

Ref. No	Topic	Summary of submission	SCC Response
1.3.38	Survey	However, the data is believed to be valid, especially when used in conjunction with RSPB website and desk study data (Suffolk 2021 bird report).	SCC Ecology would like to know if a more up to date copy of this report has been referenced with regard to the most recent round of wintering bird surveys.

Ref. No	Topic	Summary of submission	SCC Response
Table 4 – Document 7.5.1.1 (C) Construction Traffic Management and Travel Plan Suffolk [REP4-061]			
7.4.22		<p>Site Access Arrangements:</p> <p>Vegetation clearance will be carried out at the proposed site accesses, where required, to achieve appropriate levels of visibility, subject to agreement with the</p>	<p>SCC considers that it needs to be anchored in the CTMP that temporary accesses will be micro-sited to avoid mature road side trees and important hedgerows; that vegetation within visibility splays of temporary accesses will be retained, where possible, with appropriate traffic management measures (such as temporary traffic lights or supervised traffic flow) being the default option, and coppicing being considered an alternative, only if the first option is not feasible; full removal of vegetation from visibility splays of temporary accesses should be avoided as a matter of principle. The additional mitigation with regards to dormouse should also be cross-referenced here.</p>

Ref. No	Topic	Summary of submission	SCC Response
		local highway authority.	
5.44		States S-BM12 will have 1 HGV per day at peak construction.	SCC is of the understanding that this access is purely for mobilisation works for the eastern side of the Fromus Crossing, so there should be no vehicles should be using this access during the construction phase of the project. 6.1.4 defines mobilisation as ‘temporary access routes for HGVs, or other construction vehicles/plant, to access the construction corridor to construct site access junctions, construct/remove the temporary haul road, and to access areas that are between watercourse crossings where advanced works may be required from both sides of a watercourse prior to installing a haul road crossing. These routes are also expected to provide access for light vehicles for the duration of the construction works’.
5.5.4			SCC notes that this has been amended to refer to the A12 as an AIL route. As yet the applicant has made no commitment to assess the structures on this route for suitability to carry the anticipated loads. At present 2 structures on the A12 south of Yoxford have restrictions for AILs. Table 6.2 does not acknowledge any issue with structures on the routes.
6.2.10			<p>This is the same as the SPR AIL route. SPR do not have clearance to use this route yet as they have not assessed the structures. SCC disputes that there is certainty that this access road can be used as the structures on them have not been assessed for AIL Special Order movements and the following restrictions apply:</p> <p>B1122</p> <ul style="list-style-type: none"> • Midleton Culvert: STGO3 • Theberton Church Culvert: STGO3

Ref. No	Topic	Summary of submission	SCC Response
			<p>B1069</p> <ul style="list-style-type: none"> Coldfair Green: STGO2 <p>B1121</p> <ul style="list-style-type: none"> Friston Culvert: C&U <p>A1094</p> <ul style="list-style-type: none"> Snape Watering: STGO3 Firs Farm (Friston): STGO2 <p>B1119</p> <ul style="list-style-type: none"> Church Road Saxmundham: STGO2 <p>With delays to the SPR project, particularly delays in securing EA1(N) in recent bidding rounds, it is more likely that EA1(N)/ EA2 and Sealink will overlap in the delivery phase. If this is the case the Applicant is requested to consider how two temporary access close together on the B1069 (SPR AC4, also referred to as access 9 and 10, as shown on the works plans, corresponding to Sealink S-BM03 and 4) will operate or if there are opportunities for all projects to use the same access.</p>
7.2.16		States “selected heavy plant deliveries”	<p>SCC require clarity on what this description means, is it referring to AILs?</p> <p>Greater clarity on numbers and types would be welcome. As noted in our response to Rep4-101 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study SCC does not consider that there is ‘certainty’ that this route is fit for purpose as a number of structures have not yet been assessed for special order movements by either National Grid or SPR.</p>

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7.2.27			SCC notes that a topographic and utility survey has been undertaken but this information has not been shared with SCC. With regard to the utility survey it is unclear if this is a desk based one or if the location of services has been proven by investigation.
7.2.37			SCC is encouraged that the applicant recognises that speed restrictions deployed in isolation cannot be relied on to reduce traffic speeds and some Form F calming or enforcement may be necessary to achieve the desired effect.
7.2.38 & 7.4.13			SCC notes that light construction traffic would be diverted through Saxmundham. SCC would be interested in the likely quantity of such movements and presumes these movements will most likely be immediately before and after the network am and pm peaks and hence impact the Saxmundham town centre traffic signal junction.
7.4.9			<p>As a note of caution with respect to ANPR the experience of SCC when delivering NSIPs is that selection of the location should consider how power can be supplied as this has been a significant issue when equipment is placed in rural locations.</p> <p>It remains unclear how the reporting process in 7.4.11 will operate and if this information will be made available to the public. Section 5.2 of the SPR EA2 Outline Construction Traffic Management Plan in SCC's view sets out a suitable process with the content and method of publishing the report since agreed when finalising the CTMP.</p> <p>https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010078-004790-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan.pdf</p> <p>and the final plan: -</p>

Ref. No	Topic	Summary of submission	SCC Response
			https://suffolk.planning-register.co.uk/Planning/Display?applicationNumber=SCC%2F0172%2F25%2FDoR%2FEA1N

Table 3 – Document 9.105 Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099]

SCC General Comments

SCC have undertaken a partial comparison of SZC and Sealink traffic forecast to use the A1094/B1069 corridor using published data. This indicates that whilst individual peaks (yellow) are not expected to coincide the cumulative peaks (orange) can occur at different times to any individual peak, in this case the cumulative HGV impact does not correspond with either project peak.

Route 2 A1094 Snape Road - all 2 way movements																																							
2024				2025				2026				2027				2028				2029				2030				2031				2032							
1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4				
SPR (Sub station route)																																							
Source - CTMP submitted Dec 2025 Planning Application - SCC/0172/25/DoR/EA1N																																							
HGV								150 254 240 180				88 102 162 162				170 170 93 90																							
Other								230 340 350 352				318 340 332 296				218 230 232 216																							
Sealink																																							
Source - Data supplied by Sealink 06/02/2026																																							
HGV								10 140 180 14				8 90 164 69 84 81				61 58 50 83				86 86 8 0				0 0 93 93				0 0 0 0											
Other								62 343 369 166				30 156 210 205 390 416				209 202 126 211				210 136 62 0				0 0 143 143				0 0 0 0											
Total																																							
HGV				0 0 0 0				0 0 0 0				150 254 250 320				268 116 170 252				334 239 177 171				61 58 50 83				86 86 8 0				0 0 93 93				0 0 0 0			
Other				0 0 0 0				0 0 0 0				230 340 412 695				687 506 362 452				428 435 622 632				209 202 126 211				210 136 62 0				0 0 143 143				0 0 0 0			

SCC notes that the traffic data for Sealink is likely to move backwards in time but also that it may coincide with Lionlink traffic on some routes. SCC considers that further work is needed to understand the relationship between various projects including SZC and LionLink but is concerned that the resources are considerably stretched at this time being split between delivering consented projects, examination for Sealink and N2T and providing preapplication and statutory consultation responses.

Inter project peaks

The information provided here shows specifically that the Sealink / EA2 interaction in terms of traffic is not just restricted to the coincident of peaks but that a higher cumulative impact can occur at other times.

SPR EA1N has not been funded and delivery unknown, albeit the substation and ducts are to be delivered as part of EA2.

There are 4 key dates in the SZC Consolidated Transport Assessment namely

- Baseline 2019
- Early years scenario 2023 prior to opening of the Sizewell Link Road (freight) and park and rides (workers), now likely early 2028.

- Peak Years estimated around 2028, likely to also be delayed 2 to 3 years.
- Operational year 2034, again likely to be delayed.

Generally, SZC movements increase on a linear basis rather than the more ‘peaky’ numbers from other projects for cable corridors. It is also important to understand that the split definition of Early Years’ between freight and workers has a bearing on traffic movement. In the assessment and DCO it was presumed that both would be at a similar time. This has proven to not be the case with the park and ride sites opening in early 2026 but SLR not likely until late 2027/2028. Thus, the workforce is likely to be increasing earlier than allowed for in the assessment when compared to delivery of the road infrastructure. Evidence provided elsewhere by SCC shows that some transport impacts, notably on the A1094/B1069 are higher than forecast.

In the recent LionLink consultation little detail was provided to allow SCC to comment on the number of construction vehicles, routing or phasing. It is notable that the applicant only considers that access S-BM09 (ie B1121) will be impacted by LionLink, not the A12 or other routes.

Ref. No	Topic	Summary of submission	SCC Response
Table 4 – Document 9.111 (A) Applicant’s Response to Socioeconomic, Tourism and Recreation and Health and Wellbeing Submissions [REP4-100]			
6.1	Impact of restricted access to health infrastructure	SCC expects the Applicant to implement, monitor, and coordinate mitigation measures across relevant plans to minimise disruption to healthcare access, including engagement with communities and providers, temporary access arrangements, and coordination with other NSIPs	<p>Regarding Document 9.86, SCC notes the Applicant’s references to [REP2-014], including Table 2.2 against References 39 - 42 and Table 2.12 against reference 127, and the associated cross-references to the Health and Wellbeing and Inter-Project Cumulative Effects assessments.</p> <p>SCC does not consider that the Applicant has directly addressed the specific matters raised in SCC’s Deadline 2 submission, namely the expectation that the Applicant should implement, monitor and coordinate mitigation measures to minimise disruption to healthcare access. This includes engagement with healthcare providers and communities, consideration of temporary access arrangements where required, and coordination with other NSIPs where cumulative construction impacts may affect access routes.</p> <p>The responses cited by the Applicant largely address inter-project coordination at a strategic infrastructure. The matters raised by SCC relate not solely to assessed health outcomes, but to the practical management of construction related disruption and its potential to affect access to</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>primary care, emergency services, community health services, and other healthcare provision.</p> <p>SCC therefore reiterates its expectation that the Applicant should demonstrate how healthcare access has been specifically considered. This should include details of engagement with relevant healthcare providers to identify sensitive access routes and service delivery constraints, monitoring and mitigation.</p>
6.2	Local Employment	SCC believe the Applicant should develop and implement a Local Employment and Skills Plan prepared in collaboration with SCC	SCC welcome the confirmations set out in A10.15 of Document 9.86 setting out the intention to discuss the terms and develop Skills and Employment Plans in order to submit such a plan at Deadline 6.
6.3	Change to the Order Limits South East of Friston, Suffolk – Health & Wellbeing	Doc 9.7.65, Change 2 and Change 5, Applicant indicates there are no new or different significant effects on health and wellbeing	<p>Whilst the Applicant states that the proposed changes do not introduce changes to cited technical chapters and therefore gives rise to no new or different likely significant effects on health and wellbeing, this position is not fully substantiated from a public health perspective.</p> <p>The extension of the Order Limits materially changes receptor proximity, bringing construction activities closer to residential properties that were not previously assessed within the Environmental Statement. Even if predicted impacts for noise, vibration, air quality and traffic remain within assessed thresholds, a reduction in separation</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>distance can influence magnitude, duration and perception of effects, particularly in relation to construction phase disturbance and associated stress responses. In the absence of any formal revision or addendum to the relevant technical chapters to reflect the reduced separation distances to additional receptors, and without specific confirmation that these receptors have been quantitatively assessed against the original assessment methodology and significance criteria, the conclusion that no new or different likely significant effects would arise lacks foundation.</p> <p>A proportionate and comprehensive approach would be to formally review the relevant Environmental Statement chapters in light of the revised Order Limits to demonstrate, with clear evidence, that predicted impacts at the nearer receptors remain within assessed parameters and that mitigation measures continue to be effective. On that basis, SCC considers that the Applicant's position should be further substantiated rather than accepted at face value.</p>
6.4	Public Mental Health	The consenting and construction of major infrastructure projects such as the Proposed Scheme can have significant and enduring impacts on the mental health and wellbeing of local residents. Changes to the local	To effectively mitigate the effects of prolonged construction disturbance on community wellbeing, SCC expect the Applicant to revise the proposed core working hours to minimise avoidable noise, vibration, and disruption and protect public mental health.

Ref. No	Topic	Summary of submission	SCC Response
		<p>environment, including alterations to landscape character, increased noise, vibration, activity, and the presence or introduction of large-scale infrastructure, can diminish residents' sense of place, belonging, and control.</p> <p>Uncertainty surrounding the scale, duration, and nature of the works, as well as concerns about continued access to essential services, community facilities, social infrastructure and green/blue spaces, may contribute to heightened stress, anxiety, and reduced quality of life, particularly among vulnerable groups such as older people, disabled residents, and those without access to private transport.</p>	<p>Public Health recognise the Applicants comments detailed in Document 9.73 reference 1GEN49 regarding programme certainty, contractor logistics, national energy objectives, and potential constraint costs. The strategic need case and delivery pressures are noted.</p> <p>However, from a public health perspective, infrastructure delivery must be balanced against the protection of community health and wellbeing. Extended core working hours, including routine Sunday and Bank Holiday working, have the potential to materially reduce predictable periods of respite for affected communities over a prolonged construction programme.</p> <p>Environmental health and public health practice recognises that sustained noise, vibration and activity outside conventional weekday hours can contribute to sleep disturbance, stress, reduced respite, and wider mental wellbeing effects, even where technical thresholds for “significance” are not exceeded. Development of nationally significant infrastructure should not come at a disproportionate cost to community mental health and quality of life, particularly where impacts are experienced over extended durations.</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>Whilst SCC recognises the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working across the onshore elements represents the least harmful approach, nor that alternative phasing or geographically targeted restrictions have been fully explored. Public Health therefore maintains that working hours are restricted to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC with start-up and close-down periods should be strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses.</p> <p><i>Monitoring</i></p> <p>Public Health considers that the Applicant should develop and implement a proportionate but robust Mental Health and Wellbeing Monitoring Plan for the duration of the Project (construction and early operation), with clear reporting routes and defined review points.</p> <p>Reliance solely on publicly available GP or Primary Care data would be insufficient, as this captures only those individuals who actively present and self-report. This approach risks</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>underrepresenting wider community impacts, particularly among individuals who experience stress, anxiety or wellbeing deterioration but do not engage with formal health services.</p> <p>Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views are influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, survey and qualitative approaches can provide valuable triangulation when designed appropriately and interpreted alongside service data.</p> <p>Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include:</p> <ul style="list-style-type: none"> • Population health management (PHM) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services • Engagement with Primary Care leads within the project catchment to identify emerging trends

Ref. No	Topic	Summary of submission	SCC Response
			<ul style="list-style-type: none"> • Regular liaison with Community Mental Health Teams • Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately) • Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue • Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND as detailed: https://www.suffolkmind.org.uk/reports-and-accounts/ and University of Suffolk as detailed: https://www.uos.ac.uk/about/news/2025/university-publishes-independent-study-on-early-impacts-of-sizewell-c/ • Public Health does not seek to prescribe the precise methodology; however, the Applicant should set out a transparent, evidence-based framework that combines quantitative service data with qualitative community insight, establishes a baseline, defines

Ref. No	Topic	Summary of submission	SCC Response
			<p>indicators and thresholds, and explains how findings would trigger mitigation or adaptation of measures.</p> <ul style="list-style-type: none"> Following SCC’s guidance on community engagement: https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf <p>Without such a structured monitoring plan, there is a risk that mental health and wellbeing impacts are either under-detected or interpreted in isolation, limiting the ability to respond proportionately and effectively.</p>
	Tourism	Failure to Provide Local Tourism Evidence Despite Admitting Visitor Perception is Relevant	<p>Whilst we welcome the potential use of SZC Park and Ride facilities as a means of reducing construction traffic is welcome, SCC remains dubious about the applicant’s statement of “limited robust evidence”.</p> <p>This is not the same as “no adverse effect” and consideration still needs to be given to the effect on the visitor economy</p> <p><i>“the Proposed Project is a much smaller scheme with a more limited construction workforce and duration and therefore has the potential for significantly fewer and more localised effects”.</i></p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>Whilst this statement may be correct, it does not recognise the cumulative effect of overlapping NSIPs, as these projects will not be happening in isolation.</p>

SCC Response**Table 5 – Document 9.114 (A) Interim Phase 3 Archaeological Report [REP4-103]**

Submission of this interim report is noted. SCCAS look forward to the submission of the full Phase 3 evaluation report in due course.

In line with previous advice, the results of this additional archaeological survey work have shown that although some further archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be required in this section of the cable corridor, there is a suitable alternative route available which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance.

Provision for suitable archaeological mitigation within this part of the scheme, including the additional area added as part of the Changes Consultation, should be included in the revised OWSI, which the Applicant has advised will be submitted in due course.

Ref. No	Topic	Summary of submission	SCC Response
Table 6 – Document 9.86 (A) Applicant’s Comments on Other Submissions Received at Deadline 3 and 3A [REP4-082]			
A2.20	Hedgerow widths	Hedgerows will be maintained at a height of 2.5-3.5m. The applicant will consider deletion of specific reference to dimensions as a matter for the detailed LEMP post DCO consent.	SCC Ecology welcome the proposed deletion of the hedgerow widths and height requirements from future documents.
A3.4	Acid grassland	The acid grassland restoration and enhancement will be maintained for 10 years as it is mitigation for the temporary loss of acid grassland. This area should have returned to a suitable condition before the ten years of maintenance has ended.	SCC Ecology agrees with the stated 10-year aftercare period for this area of habitat. The loss is classed as temporary and therefore not subject to any requirements regarding BNG for the red line boundary.
A3.6	Overwintering bird surveys	However, 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.	SCC Ecology agree with the applicants’ stance regarding overwintering surveys at RSPB North Warren. The survey data from the RSPB will be more comprehensive for this location.
A9.1/A9.4	Local supply chain and economic impact	The Applicant intends to work closely with the Council and its contractors to develop a Social Value strategy. The Applicant has not committed to a dedicated Employment, Skills,	SCC notes the Applicant’s intention to submit outline Skills and Employment Plans (SEPs) at Deadline 6. However, the Applicant has not yet contacted SCC to initiate the discussions necessary. These discussions are imperative

Ref. No	Topic	Summary of submission	SCC Response
		<p>and Education Strategy due to the perceived limited scale of construction employment impacts. The Applicant is exploring collaboration opportunities.</p>	<p>to develop a SEP that reflects local requirements and aligns with the Regional Skills Coordination Function (RSCF), which SCC operates on behalf of Suffolk.</p> <p>SCC reiterates that the SEP must provide clear workforce requirements for all phases of the project, including workforce numbers, skills, role durations and the anticipated split between home-based and non-home-based labour. This information is essential for coordinated workforce planning across Suffolk’s NSIPs. The SEP should also set out how the Applicant will work with the RSCF to align training provision, address skills gaps and support a “right skills, right time” pipeline that maximises local employment opportunities and contributes to long-term legacy skills development.</p> <p>The SEP must include a jointly developed education and training strategy demonstrating engagement with FE, HE and private providers, and supporting inclusive pathways such as apprenticeships, Bootcamps and modular training. It should also explain how supply-chain workforce needs will be shared with the RSCF to strengthen local supply-chain capacity.</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>SCC expects the Applicant to commit to early and ongoing information-sharing to support adaptive management across Suffolk's NSIPs, enabling the RSCF to maintain accurate labour-market intelligence and manage cumulative pressures. The SEP should also support the monitoring of wider socio-economic effects and confirm participation in joint monitoring and governance through existing SCC and RSCF structures.</p> <p>Given the limited time before Deadline 6, SCC invites the Applicant to make contact without delay to begin the development of a comprehensive SEP.</p>

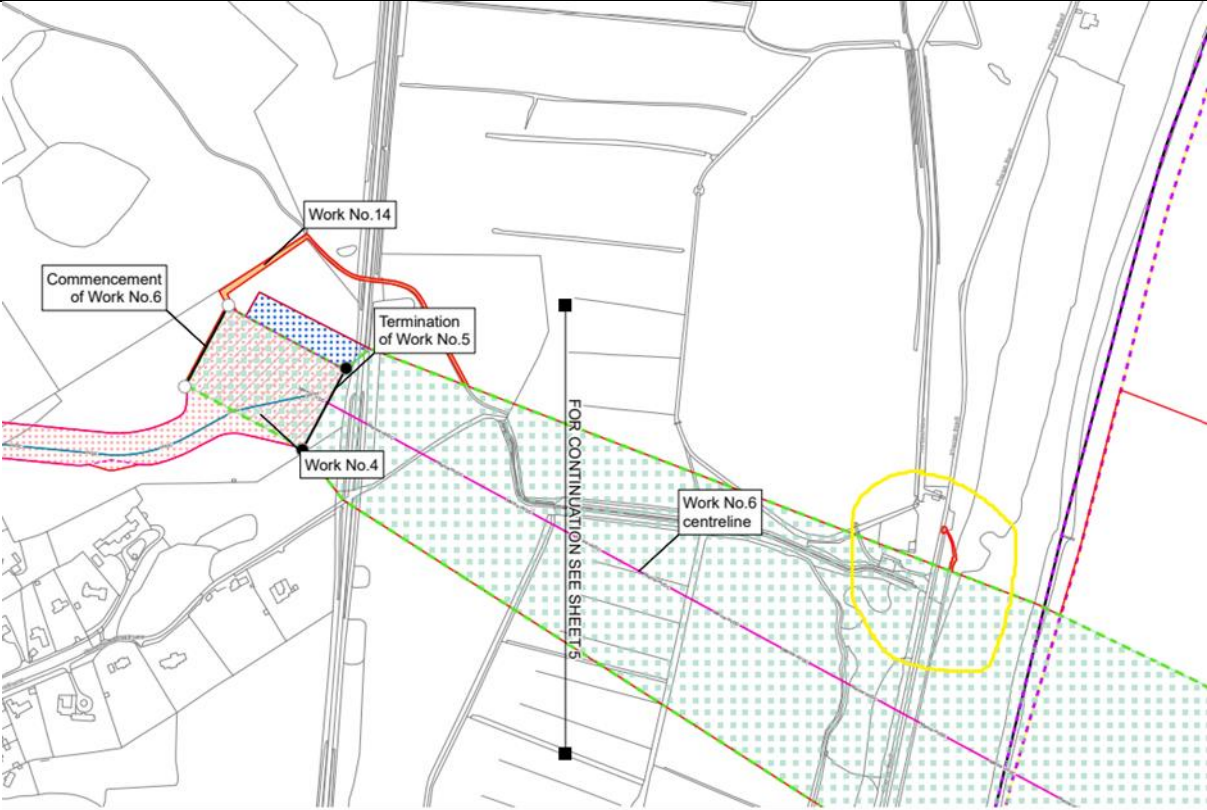
Ref. No	Topic	Summary of submission	SCC Response
Table 7 – Document 9.87 (A) Applicant’s Comments on Responses to First Written Questions [REP4-083]			
1ECOL14	Dormouse surveys	The Application document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4 has been updated to be clearer about a commitment to an update survey for dormice and to include precautionary mitigation to enable continued dormouse connectivity if any dormice are found during the updated surveys.	SCC Ecology welcome the position of the applicant regarding further dormouse surveys at this location.
1SERT7	Employment and skills plan	The Applicant has agreed to submit outline Skills and Employment Plans at Deadline 6. The Applicant will arrange meetings to progress and discuss suitable opportunities that will form the outline plans with the local authorities.	<p>SCC notes the Applicant’s position regarding the relatively small construction workforce associated with the Suffolk and Kent onshore schemes. However, SCC emphasises that workforce impacts cannot be considered in isolation. Sea Link forms part of a wider programme of major energy infrastructure in Suffolk and the East of England, and even modest workforce numbers contribute to cumulative demand pressures on labour supply, training capacity, accommodation, and local services.</p> <p>For this reason, SCC welcomes the Applicant’s intention to submit an outline Skills and Employment Plan (SEP) at Deadline 6 and supports the Examining Authority’s requirement for such a plan. A project-specific SEP remains</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>essential to ensure that Sea Link’s workforce needs are integrated into coordinated planning across Suffolk’s NSIPs and to maximise opportunities for local residents, local providers and the supply chain.</p> <p>SCC also notes the Applicant’s commitment to engage with local planning authorities and encourages early contact with SCC, particularly in its role operating the Regional Skills Coordination Function (RSCF), so that meaningful discussions can take place and a comprehensive SEP can be developed in time for Deadline 6.</p>

Ref. No	Topic	Summary of submission	SCC Response
Table 8 – Document 9.89 (A) Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]			
15.3	Skills and Employment	The Applicant does not intend to include a Skills and Employment Plan within the DCO due to the relatively small construction workforce (around 86 FTE at peak). Instead, it considers that contributing to wider regional skills initiatives outside the DCO would be more proportionate and effective.	<p>Suffolk County Council (SCC) notes the Applicant’s position that the scale of the Sea Link construction workforce is modest when considered in isolation. However, SCC emphasises that Sea Link does not exist in isolation: Suffolk is currently host to a concentration of major energy-related NSIPs, and even comparatively small workforce demands contribute to cumulative labour-market pressures, training capacity constraints and the wider socio-economic impacts experienced across the county.</p> <p>For this reason, SCC strongly supports the Examining Authority’s Action Point requiring the Applicant to provide a Skills and Employment Plan (SEP) including a local education and training strategy, or to set out a timetable for its submission. A dedicated SEP is the appropriate and proportionate mechanism for ensuring that the project’s workforce needs, however modest, are understood, planned for and integrated into county-wide, cross-project</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>labour-market management. This is essential if Suffolk is to mitigate cumulative risks and maximise opportunities for local residents.</p> <p>SCC welcomes the Applicant's stated willingness to support regional skills initiatives, but this must be underpinned by project-specific commitments and clear information. Without a defined SEP, SCC, through the Regional Skills Coordination Function (RSCF), cannot meaningfully incorporate Sea Link's workforce requirements into coordinated workforce planning or develop appropriate training pathways in collaboration with local FE, HE and training providers.</p> <p>SCC looks forward to early engagement with the Applicant and encourages immediate contact so that the SEP required by Action Point 105 can be developed in collaboration with the RSCF and submitted in a timely manner.</p>

Ref. No	Topic	Summary of submission	SCC Response
Table 9 – Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition 1 (CAH1) at Deadline 4 [REP4-086]			
AP3	Alternative access routes	Response to suggested alternative access routes to the Saxmundham Converter Station provided by SCC at Deadline 4.	SCC attaches Appendix A to illustrate potential options for an alternative access route utilising the Sizewell Link Road
Figure 6.4.2.77	Main Diversion Routes for B1121 Road Closure	<p>SCC makes the following comments:</p> <ul style="list-style-type: none"> • B1121 through Sternfield and Friston has been recognised as unsuitable for construction in past DCOs. In particular the right turn onto the A1094 for south / west bound traffic is difficult. • The use of Snape Road, Sternfield is not a like for like alternative being a C class road not B and concerns about additional traffic at the A1094/B1069 Snape Church crossroads have been raised throughout the examination. • The applicant has presumed the Chantry Road / Mill Lane forms part of the B1119 which it does not nor is it suitable for large vehicles. • No consideration seems to have been given that the B1121 would need to be closed from the site entrance S-SM09 to the bridge to allow movement of any temporary structure (if this option chosen). <p>The access off C248 Aldeburgh Road, whilst shown within the red line is not annotated as a work no. (REP4-006) presumably this would be works no. 14 (as REP4-218). SCC notes that at present this is an informal parking area adjacent to the highway and not an access. If use is required to access the site at this location a formal access design will be required to be submitted to the highway authority for approval.</p>	

Ref. No	Topic	Summary of submission	SCC Response
		 <p data-bbox="651 1145 2134 1220">If the temporary bridge (option2) is to be stored within the site adjacent to the River Fromus will this require a large site compound than shown as works no.4 (SO1) in REP4-008?</p>	

Ref. No	Topic	Summary of submission	SCC Response
Table 10 – Document 9.90 (A) Applicant’s Response to Action Points from Issues Specific Hearing 2 (ISH2) at Deadline 4 [REP4-086]			
AP 47	Having regard to paragraph 5.10.11 of National Policy Statement (NPS) EN-1, can you explain whether you consider the development is compatible with the special character of the Heritage Coast?	<p>There is no permanent infrastructure sited within the Heritage Coast or its setting. The only effects are associated with the construction of the landfall and HVDC cable corridor, which along with their reinstatement would result in short term, temporary and minor adverse, not significant effects.</p> <p>The Applicant therefore considers that the temporary nature of the Proposed Project’s interface with the Heritage Coast is compatible with the special character.</p>	<p>The tests referenced in para 5.10.11 of EN-1 do not specify that they must be adhered to only in relation to permanent effects. The development includes temporary works which are not compatible with the special character of the Heritage Coast for the reasons set out in SCC’s response to this Action Point.</p> <p>Moreover, the Applicant has not considered the offshore elements of the designated Heritage Coast, which will be affected by vessels undertaking the Applicant’s works.</p>
AP115	All parties (applicant and councils) to meet/liase to agree suitable wording of article 10 which	The local authorities raised concerns as to whether article 10 could lead to TCPA applications which bypass the controls secured by the draft DCO, and also that the article could be used to sidestep the controls in other made DCOs.	<p>SCC does not consider that the Applicant has fully considered the implications of the second concern recited here which was raised by SCC in ISH 2. Subparagraph (2), which remains unchanged, provides:</p> <p><i>‘(2) To the extent any development carried out or used pursuant to a planning permission granted under the 1990 Act or development consent granted under the 2008 Act or</i></p>

Ref. No	Topic	Summary of submission	SCC Response
	all parties are content with, with an update on progress and any agreement submitted.		<p><i>compliance with any conditions of that permission or requirements of that development consent is <u>inconsistent with the exercise of any power or right under this Order or the authorised project: (a) that inconsistency is to be disregarded for the purposes of establishing whether any development which is the subject matter of that planning permission or development consent is capable of physical implementation; and (b) in respect of that inconsistency, no enforcement action under the 1990 Act or the 2008 Act may be taken in relation to development carried out or used pursuant to that planning permission or development consent whether inside or outside the Order limits.</u></i> ‘(underlining added)</p> <p>As written, the parts underlined would allow that, where there is an ‘inconsistency’ because of overlap with the Sea Link DCO (i.e. at Friston), no enforcement action under the 2008 Act can be taken ‘in respect of that inconsistency’.</p> <p>Thus, if there was an inconsistency in (say) the landscaping or drainage details as between the EA2 DCO (together with its control documents) and those details in the Sea Link DCO (together with its control documents), and the development was undertaken under the EA2 DCO but the physical works as carried out were not strictly in</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>accordance with the EA2 DCO (together with its control documents), it would appear that no enforcement action under the 2008 Act could be taken in relation to those non-compliant physical works.</p> <p>That may not be what is intended, but it seems to be the effect of the current wording. To deal with the concern, there may be a need to refine or in some way define ‘inconsistency’ so it is made tighter.</p> <p>Article 10(3) would also stop such works from being the subject of enforcement action for being inconsistent with the Sea Link DCO.</p> <p>The potential for this consequence does not appear to have been acknowledged by the Applicant in its responses regarding Article 10.</p> <p>SCC has discussed Article 10 with the Applicant and intends to engage further to reach agreement on appropriate wording.</p>

Ref. No	Topic	Summary of submission	SCC Response
Table 11 – Document 9.91 Applicant’s Comments on Change Request (CR1) Relevant and Written Representations [REP4-089]			
5.16	Proposed works at Benhall Bridge	Table 3.7 of Application Document 9.76.5. Change Request: Addendum to Volume 6 Environmental Statement (CR1-055) identifies that scrub on the embankment is suitable for badgers and this will require further survey prior to works commencing.	SCC Ecology welcomes the commitment from the applicant regarding the requirement for further surveys for badger at this location.
5.19	SCC Ecology stated the requirement for further surveys for badger, bats and dormice in the vicinity of the Benhall Bridge site.	Noted: these surveys will be undertaken pre-construction once the extent of vegetation removal has been confirmed.	SCC Ecology welcomes the commitment to these further surveys from the applicant.

Table 12 – Document 9.112 (A) Benhall Railway Bridge [REP4-101]**SCC General Comments**

Noted that NG have replaced 100 transformers in the past 10 years but that it is not common practice for developers to assist highway authorities in developing or protecting long term resilient routes to allow access to sub stations.

The applicant has not considered any other structure on the local road network, for example those on the A12 where it is known that some structures cannot accommodate abnormal loads in terms of weight.

It is notable that restrictions on the A12 have been causing delays to AILs moving to and from the SZC project i.e. post consent. By consideration post consent this means that any impacts associated with temporary or permanent works on the highway network are not assessed in terms of impact (i.e. delay or construction impacts such as noise noting that for major routes such as the A12 this needs to be undertaken outside network peaks). SCC has encouraged all NSIP developers to undertake a feasibility study of AIL routes to their project to identify any specific concerns and generally this has been accepted (SZC, SPR, Sunnica) albeit this commonly indicates gaps in structural data requiring further review and inspection before an assessment of the structure to carry planned loads can be completed and movements approved.

SCCs position is that it is preferable to undertake repairs / improvements to the bridge to prove a long term benefit albeit an understanding of the impacts of such works would be required before making a final decision. If LionLink were to be consented with the proposal to also use this route the benefits of a long term solution are greater. To assist this SCC is working with the applicant to identify additional inspection of the structure required to design any repair or improvement works.

SCC is familiar with the use of ‘mini’ bridges for example on the A137 at Ostrich Creek and the A140 at Brockford Street. In both cases significant work was required to deploy and remove the bridges with closure of a major route. See the following articles:

<https://www.bbc.co.uk/news/articles/cyxz71w2jpo>

<https://www.bbc.co.uk/news/uk-england-suffolk-67452653>

At present details of the size and layout of any temporary structure for option 2 has not been submitted to SCC for formal comment and concerns remain about installing a structure with the challenging geometry of the bridge and adjacent road. SCC has not seen the topographical survey of the Benhall Railway Bridge (2.3.2), and would welcome the opportunity to review it as this may help understand the practicality of a temporary bridge.

SCC notes in [REP4- 139] National Rail considers that:

A railway closure of the line beneath Benhall Bridge would be necessary, if either of the Applicant's proposed options (bridge strengthening works or use of a mini bridge) were undertaken to facilitate abnormal load crossings.

Both options involve substantial works to be carried out either above or immediately adjacent to an operational railway line, which, to ensure the safety of passengers and the railway, would necessitate a closure of the line during the works.

At present, it is not possible to comment on the specific duration and timing of any railway closure, as this would depend on several factors including, the operational timetable for the line, the scope and method of the works, and the availability of pre-booked possessions.

SCC is concerned about the impacts on the rail network as well as the highway network, particularly if the former disrupts rail freight deliveries to SZC and increases HGVs on the local network.

The use of the B1122 to access the site in the same way as EA2 is a potential option. However, SPR have yet to access any of the structures on this route and its suitability for transportation of abnormal loads is not a certainty (as presumed in 1.1.12). Presumably the applicant would provide internal haul roads to allow access to the convertor station site.

SCC notes that movement of cables are not included in the estimated AIL movements in 1.2.3 so it is presumed they use alternative access routes. Nor does the total include movement of plant on low-loaders which may exceed 46 tonnes.

Whilst acknowledging the uncertainties with the duration of disruption for either option 1 or option 2 the former requiring 28 days appears less disruptive than 15 three-day closures (possibly double if LionLink uses this route). It is noted that the developer has proposed storing the temporary overbridge at the River Fromus compound. Clarity is sought if the movement of this bridge will require closure of the B1121 from the site access to the A12 which would be more disruptive if only the section from the A12 to B1121 Church Hill (Sternfield) is required.

Table 13 – Outline Code of Construction Practice [REP4-232]
SCC General Comments
<p>GG11 mentions managing staff / vehicles entering and leaving the site but how this is done nor that the shift patterns assumed in the CTMP will be affected.</p> <p>GG15 runoff onto the public highway must be prevented by providing suitable drainage or other restraint.</p> <p>GG17 does not define when wheel washing should be required. In the Highway Authorities view this should be at any location where there is a risk of mud or debris being tracked onto the public highway.</p> <p>TT01 refers back to OCTMTP for measures to control means of access and egress to the public highway but not how this is achieved.</p> <p>TT04 states that by limiting the number of HGVs to 30 per day (not clear if deliveries or two-way movements) on Sundays and bank holidays these will not have an impact. Survey data from a number of roads indicates that baseline traffic is higher during August than neutral months and that greater peaks can occur on Sundays or Bank Holidays. Therefore, while the proportional impact of the development is likely to be reduced on these days but the total cumulative impact higher. Further work is needed to assess the available information to allow a quantitative assessment to be made.</p> <p>TT11 Unsure if the taxi service will also be made available to other non-motorised users of the B1121.</p>

Table 14 – Document 3.1 (G) draft Development Consent Order (dDCO) [REP4-217]
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SCC General Comments**Article 11 (street works)**

Paragraphs 15.10 to 15.19 of SCC's LIR [REP1-130] set out SCC's concerns in respect of article 11 (street works). The following point concerning article 11 is in addition to those included in the LIR.

SCC consider certain of the powers listed in article 11(1) are, absent robust justification, in excess of those required to deliver the project and could compromise the street authority's ability to safely manage its network at reasonable expense. Specifically, the matters listed in sub-paragraphs (c), (d), (e), (f), (g) and (i) could result in permanent works being incorporated into the highway maintainable at public expense without any involvement from the street authority. This is a matter of concern for SCC who are bound by the Highways Act 1980 (s41) to maintain such works or remove or modify them at public expense.

Absent a suitable highways side agreement or protective provisions to protect SCC's highways interests, SCC considers art.11(1) should be subject to the street authority's consent.

Schedule 3, Requirement 3 (detailed design)

Please see SCC's reply to question 2GEN6, included in SCC's answers to the ISH2 questions and which are also submitted at Deadline 5.

Schedule 3, Requirement 6 (management plans to be approved)

New sub-paragraph (3) of Requirement 6 states -

"All landscaping works must be carried out and maintained in accordance with the Landscape and Ecological Management Plans approved under sub-paragraph (1), and in accordance with **the relevant recommendations of appropriate British Standards**". [Emphasis added].

SCC considers the emphasised words are vague (which "relevant" recommendations? which British Standards?). Requirements are the DCO equivalent of planning conditions (section 120(2)(a) Planning Act 2008) and one of the six tests for conditions is precision (*Circular 11/95: Use*

of conditions in planning permission (paragraph 14). As currently drafted, sub-paragraph (3) is imprecise and SCC considers it should be reworked by the applicant to ensure the requirement is drafted with precision.

Schedule 3, Requirement 6 (management plans to be approved)

New sub-paragraph (4) of Requirement 6 states -

“Any tree or shrub planted as part of an approved Landscape and Ecological Management Plans that, within a period of five years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless alternative timing or a different specimen is otherwise approved by the relevant planning authority”.

Owing to the erratic nature of Suffolk’s weather patterns (especially in spring), a ten-year aftercare period would be considerably more appropriate than five years. Any species planted must be native and ideally of local provenance to give the best chance of successful establishment.