



**The Planning Act 2008**

**Application by National Grid Electricity Transmission for the Sea Link Project**

Issue Specific Hearing 3 dealing with environmental matters, 25<sup>th</sup>, 26<sup>th</sup> and 27<sup>th</sup> March 2026

East Suffolk Council's Post-Hearing Submission

Deadline 6 (13<sup>th</sup> April 2026)

Application: EN020026

East Suffolk Council: [REDACTED]

1. Welcome, introductions, arrangements for the hearing	
Speakers on behalf of East Suffolk Council (ESC):	
<ul style="list-style-type: none"> <li>• [REDACTED] – [REDACTED], Francis Taylor Building</li> <li>• [REDACTED] – Sector Development and Trade Lead, East Suffolk Council</li> <li>• [REDACTED] – Sizewell C Tourism Programme Manager, East Suffolk Council</li> <li>• [REDACTED] – Coastal Technical Officer, East Suffolk Council</li> <li>• [REDACTED] – Principal Environmental Protection Officer, East Suffolk Council</li> <li>• [REDACTED] – Principal Ecologist, East Suffolk Council</li> </ul>	
2. Matters arising from the Examining Authorities third written questions (ExQ3) published on 23 March 2026	
No comment.	
3. Water Environment	
3.1 Flood Risk  3.2 The applicant’s approach to the sequential and exception tests  3.3 Matters relating to the objectives of the Water Framework Directive	ESC defers to Suffolk County Council (SCC) as Lead Local Flood Authority (LLFA) and the Environment Agency (EA) on these matters.
4. Traffic and transport	
4.1 Junction Capacity Modelling – responses and updates  4.2 Driver delay mitigation  4.3 Effects of current planned highway works (such as the A12) on the proposed development construction traffic	ESC defers to SCC as Local Highways Authority on these matters.

<p>4.4 Benhall Railway Bridge update and abnormal load routes</p> <p>4.5 Potential capping of heavy good vehicles using the local road networks</p>	
<p>5. Socio-economics and tourism</p>	
<p>5.1 Accommodation for workers of the proposed development</p> <p>5.2 Tourism impact monitoring and mitigation</p>	<p>ESC noted at ISH3 that it would comment on the Applicant's Deadline 5 submissions relating to worker accommodation at Deadline 6. ESC's comments on REAC commitments SE04 and SE05, and the Applicant's responses to ExQ2 (and associated appendices) are therefore provided in Appendix A to this submission.</p> <p>ESC considers that a more specific commitment to a 'Workforce Accommodation Strategy' is required. ESC's suggested wording for a DCO Requirement is provided in response to ISH3 Action Point 1.</p> <p>ESC welcomes REAC commitments SE04 and SE05 in principle, but is concerned that they do not go far enough.</p> <p>Regarding SE04, ESC notes that both SCC and ESC are not listed as potential organisations with which the Applicant intends to engage regarding tourism, despite both councils' active involvement. ESC runs extensive tourist mitigation and development programmes for East Suffolk and the wider locality. For SE04, ESC requests that the mechanism for liaison is given due consideration, both in relation to how this commitment will be implemented in practice, and how it will be integrated into established working groups. ESC is concerned that applying another layer of engagement, on top of the sophisticated engagement that is already underway, would be required for SE04.</p> <p>The commitment, via REAC measure SE05, to monitor where workers are staying is welcomed by ESC in principle, but fails to address how this monitoring information will be shared with local stakeholders, particularly ESC which has private housing officers and pays close attention to tourism accommodation stock on. ESC therefore needs to be involved in this monitoring activity.</p> <p>The utilisation of a trigger point, which the Applicant has at this stage suggested would be 18 non-home based (NHB) workers staying in visitor accommodation, appears arbitrary and it is unclear how this figure was arrived at. A trigger point is a reactive approach to the problem, and the consideration of mitigation cannot wait until this arbitrary trigger point is reached; a proactive and forward-looking analysis of NHB workers' use of tourism accommodation is</p>

	<p>necessary. ESC considers it necessary for the use of tourism accommodation to be monitored from the offset, allowing mitigation strategies to be planned and for cumulative effects resulting from other NSIPs in the locality to be incorporated.</p> <p>ESC recognises the economic benefits that NHB workers can provide for East Suffolk, including through filling any spare capacity in visitor accommodation during the off-season. However, ESC requires more information regarding how the Applicant's discussions with other local developers are progressing, particularly in relation to specialist accommodation that is being built within East Suffolk and whether they may be any spare capacity that could be utilised for workers on the Sea Link project, and regarding the use of transport facilities such as the Sizewell C park and rides.</p> <p>ESC also requires clarity from the Applicant regarding whether commitment SE05 relates only to serviced accommodation, only to non-serviced accommodation, or to both.</p> <p>ESC would welcome the opportunity to engage with the Applicant regarding the establishment of local governance and working groups to monitor and shape the delivery of the Applicant's commitment. ESC considers this would be hugely valuable given the expertise of ESC and other tourism organisations in the area. Whilst ESC welcomes the engagement it has had with the Applicant since ISH3, including a meeting on 1 April, no progress has yet been made with regard to its request for local governance and working groups.</p> <p>Whilst ESC is concerned by the differences between ESC's analysis of total accommodations stock and that presented by the Applicant (as highlighted in Appendix D to the Applicant's responses to ExQ2 <a href="#">[REP5-136]</a>), it should be noted that total accommodation stock does not translate into availability as this will be dictated by occupancy throughout the year. ESC noted at ISH3 that occupancy was set to be about 100% over the two-week Easter holidays, and such situations would pose challenges for both visitors and NHB workers if the project were to be consented. Additionally, ESC considers the Applicant's assumption that NHB workers would want to share rooms is not necessarily true.</p> <p>ESC agrees with SCC that a proportionate tourism fund is appropriate and necessary. At ISH3, ESC's Sizewell C Tourism Programme Manager provided a summary of the Sizewell C Tourism Fund. This is a £12 million fund designed to maintain visitor confidence, sustain demand and strengthen the tourism offer during the Sizewell C construction period. Annual payments are received by ESC, and there are mandatory minimum spends on data and monitoring as part of that.</p>
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	<p>A working group is made up of the two Councils (ESC &amp; SCC) and other organisations including the Local Visitor Economy Partnership, the Suffolk Coast Destination Management Organisation, Suffolk and Essex Coast and Heaths National Landscapes Partnership, and Sizewell C. The board sit and approve the monitoring approach to understand what the industry is doing during this period. Work has thus far been focused on acquiring data sources and understanding baselines. As part of the programme, money is allocated towards marketing and PR to manage perceptions and keep the destination viable for tourism. Destination development strengthens the core reasons why people want to visit East Suffolk and can include grants to enable businesses to adapt and for sector development, with emphasis on the food and drink sector. Data and monitoring is a key aspect of the programme, with data sources including spend and footfall.</p> <p>During the Sizewell C Examination, that applicant acknowledged that perceptions were key in attracting visitors in terms of area appeal, and these perceptions therefore needed to be managed. Perception studies were conducted during that examination and ESC has commissioned longitudinal perception studies to understand East Suffolk's current audiences, where there are opportunities to grow these audiences, and what may be affecting these audiences in terms of motivations. During both these studies, it has been acknowledged that East Suffolk's key audiences are very sensitive to environmental changes, transport disruption etc. It is therefore important to have adequate monitoring and data so that we can really understand where we should be targeting those mitigation funds in the right way, and to get a return on investment.</p> <p>ESC acknowledges that it will be difficult to differentiate between the impacts that Sizewell C is having from the future Sea Link potential impacts, but ESC understands what is happening in the industry as a whole. Declines or changes in the spend or footfall data can be observed on a highly localised level; for example, ESC has observed the average food and drink transactional value decline in Leiston (the nearest town to Sizewell C) , with a shift towards more takeaway food rather than sit-down restaurant meals. This level of detail is essential to allow for a targeted response. Whilst it will be difficult to ascertain what is as a result of one project versus another, this is a natural consequence of the cumulative effects that are being experienced in East Suffolk.</p>
5.2 Tourism impact monitoring and mitigation	<p>ESC has been requesting that the Applicant commits to ongoing monitoring and reporting of socioeconomic conditions and workforce projections during the construction phase of the project in order to monitor impacts on receptors, including tourism assets.</p> <p>ESC considers that the continued absence of any identified intention to establish long-term, continuous monitoring and assessment of potential socio-economic impacts of the Suffolk Onshore Scheme on the visitor economy</p>

constitutes a fundamental failure of the Applicant's assessment. Neither the Applicant nor ESC can predict the future with certainty, and the absence of any proposed monitoring means that it is impossible to identify any of the inevitable negative changes in the visitor economy, and to plan appropriate interventions. Accordingly, ESC urges the Applicant to commit to long-term, continuous monitoring and assessment.

The Applicant's position that monitoring should be limited to worker accommodation (see Applicant's response to ExQ2 2SERT4 [REP5-135]) is fundamentally too narrow and fails to address the nature of the risk identified by ESC. The concern is not solely where workers are housed, but the broader and more complex impact on the visitor economy over time. Tourism is a dynamic and sensitive sector, influenced not only by physical availability of accommodation but also by price, perception, and overall visitor experience. By restricting monitoring to worker accommodation alone, the Applicant excludes the very indicators that would reveal whether displacement, price inflation, or behavioural changes in visitor patterns are occurring in practice. In those circumstances, impacts may arise gradually and cumulatively, yet remain unidentified and unmanaged.

This limitation is particularly significant when considered in the context of cumulative effects. The Applicant continues to assess its impacts in isolation, whereas in reality the Suffolk accommodation market is finite and shared between multiple major infrastructure projects, including Sizewell C. The interaction of these projects is not simply additive but competitive, with each drawing from the same constrained pool of accommodation. Tourism is especially sensitive to such pressures, and even relatively small changes—whether in availability, affordability, or visitor perception—can alter how a destination is viewed and experienced. There is therefore a real risk that the combined effect of multiple projects will change the perception of Suffolk as a visitor destination, undermining its attractiveness and long-term tourism strategy.

In this context, the absence of long-term, continuous monitoring of the visitor economy represents a critical gap. Without it, neither the Applicant nor the local authority can identify emerging impacts or implement timely interventions. Monitoring must extend beyond worker accommodation to include wider socio-economic indicators, including accommodation availability, pricing trends, and visitor behaviour, in order to provide a meaningful understanding of real-world effects.

In terms of mitigation, a coordinated and strategic approach is required. It is not sufficient for each project to propose isolated or siloed measures. Any mitigation—particularly financial contributions—should be designed to operate collectively across projects, recognising that the impact itself is cumulative. This includes, for example, contributions toward tourism support and destination marketing, which should be aligned with and, where

	<p>appropriate, added to existing initiatives such as those established in connection with Sizewell C. The objective must be to maximise effectiveness through a joined-up approach, rather than fragmenting resources across multiple uncoordinated schemes.</p> <p>Tourism in Suffolk is highly interconnected, both geographically and economically. Impacts in one area can have consequences across the wider region, and mitigation must reflect those interdependencies. A coordinated framework for monitoring, management, and investment is therefore essential. Without such an approach, there is a clear risk that cumulative pressures from multiple developments will erode both the capacity and the perception of Suffolk as a visitor destination, resulting in a material and lasting adverse effect on the tourism economy.</p> <p>The Sizewell C Tourism Fund provides a clear and demonstrably effective model of mitigation in practice. It was deliberately designed as a multifaceted framework, combining sector-wide monitoring with targeted and measurable, adaptable interventions. This structure ensures not only that the Fund supports the tourism industry proactively, but that it also retains the flexibility to respond to emerging or unforeseen issues as they arise. Monitoring identifies pressure points early, mitigation can then be shaped and refined to maintain the resilience of the visitor economy throughout the construction period. This Applicant for this proposed project and any future NSIPs should look to complement the approach.</p> <p>Tourism impacts do not arise in isolation, and neither should the response to them.</p>
<b>6. Health and Wellbeing</b>	
6.1 Core working hours	<p>ESC has made its position explicitly clear over the course of this examination regarding the Applicant’s proposed core working hours, and so will not repeat this here.</p> <p>With regards to specific discussions at ISH3 around the exceptions to the core working hours listed in Requirement 7 of the draft DCO, ESC is concerned that the breadth of these exceptions, together with the inclusion of start-up and close-down hours either side of the core working hours, provide the Applicant with a very broad scope to work outside of those core working hours, to the point that it undermines those core working hours. ESC is requesting further justification for each of the individual exceptions, which it considers has not yet been adequately provided by the Applicant. On the basis of the information that has been provided to date by the Applicant, ESC cannot accept the breadth of the list of exceptions in paragraphs (4) and (8) of Requirement 7, noting that the SPR EA1N and EA2 DCOs provided a much narrower list of exceptions, and ESC would expect to see a similar list in the Sea Link DCO.</p>

<p>6.2 Mental health impacts</p>	<p>Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents’ mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities. ESC noted that submissions at the OFH including from the local doctors raised this issue. This indicates real impacts on the ground now.</p> <p>The Applicant states, at Paragraph 11.8.1 of the Health and Wellbeing ES Chapter [APP-058] that <i>‘the Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project’</i>. ESC does not accept this assertion and considers that the Applicant has not <i>‘as far as possible’</i> avoided or reduced the mental health and wellbeing impacts of the Proposed Project. Most notably, as discussed above, the Applicant has failed to propose reasonable core working hours to provide the local community with respite from construction activity. This is an extremely important mitigation measure that the Applicant has failed to implement for the sake of its own project programme and costs. This is unacceptable to ESC.</p> <p>ESC cannot agree with the Applicant’s findings of ‘no likely significant adverse effects’ on health and wellbeing as a result of the Proposed Project, and when considered cumulatively with other projects in the locality. As discussed in further detail below, East Suffolk’s residents are experiencing significant disruption from other major infrastructure projects in the District, including those currently under construction, such as Sizewell C and SPR’s EA1N and EA2 projects, and those at earlier stages of the consenting process, including LionLink. This is not anecdotal. A recent survey by Suffolk Mind (the details of which are provided in the LIR at [REP1-128], paras 7.5.4-7.5.5), commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area.</p> <p>Sea Link is exacerbating, and will continue to exacerbate, these effects. ESC already has concerns for the mental health and wellbeing of its local communities, and therefore entirely rejects the Applicant’s conclusion that the cumulative effects of Sea Link in combination with other projects in the area will not have significant adverse effects on mental health and wellbeing.</p>
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	<p>It is essential that the Applicant genuinely engages with the local communities and parish and town councils. The issue of the adverse impact on wellbeing will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC has continually stressed its concerns for the mental health and wellbeing of communities currently subject to a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the spatial and temporal overlap of the construction phases of these projects can compound the effects on people’s health and wellbeing. The Sea Link proposals will undoubtedly further exacerbate these existing issues. A recent survey by Suffolk Mind, commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area. It is important to stress that increases in working hours can have significant adverse effects on people’s health and wellbeing.</p> <p>Many areas within the Suffolk Onshore Scheme Order Limits are highly sensitive and residents are already experiencing significant disruption from other major infrastructure projects. The Applicant has stated that it ‘recognises’ the adverse mental health impacts of the Proposed Project and the local community’s concerns, including, but not limited to, those in relation to the extensive proposed working hours. This is simply not enough. Instead, these concerns must be taken on board by the Applicant to inform its proposed works and mitigation. ESC is far from convinced that this has been the case to date. For example, the Applicant continues to justify prolonged, significant disruption (and the subsequent mental health impacts) to the local community caused by its proposed core working hours by citing the identification of the project as ‘Critical National Priority’. ESC considers that the Applicant has unacceptably failed to grasp the magnitude of impact or adequately consider the health and wellbeing of the local community in formulating its proposals.</p>
<b>7. Cultural Heritage</b>	
7.1 Archaeology update and assessed impacts	ESC defers to SCC Archaeological Services.
7.2 Setting of heritage assets, including cumulative impacts	ESC is content with the scope of the Applicant’s assessment of above ground heritage assets, and is not seeking any further information from the Applicant in this regard. ESC’s position remains as set out in Section 6.3.6 of its LIR [REP1-128], notably its disagreement with the Applicant’s assessment of the impacts on Hurts Hall and Hill Farm. ESC considers it unlikely that this disagreement will be resolved between now and the end of Examination. ESC confirmed at ISH3 that this disagreement does not, in ESC’s view, necessitate any change to the draft DCO.

	<p>The Council does not have any concerns in relation to non-designated heritage assets. The only relevant above ground non-designated heritage asset is Wood Farmhouse, which was recently delisted and for which ESC agrees with the Applicant’s assessment and approach.</p> <p>ESC notes that additional visualisations have been provided (Appendix A of Document 9.90: Applicant’s Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 4 [REP4-086]) which show illustrative models of the Saxmundham Converter Station within the maximum parameter blocks represented by the Rochdale Envelope. ESC has made its assessment of the impact on designated heritage assets on the basis of the maximum parameters (the worst-case scenario) of the converter station, as the visualisations are only illustrative and not definitive at this stage. If the height, footprint and layout of the converter station were definitively agreed to be as shown on the illustrative model, then we could be more certain that the visual impact on the setting of Hill Farmhouse would be lower than previously assessed.</p>
<b>8. Cumulative effects</b>	
<p>8.1 Intra-project cumulative effects including the estimation of significance and need for mitigation (including how that is secured)</p>	<p>ESC’s position is set out in its response to ExQ2 Question 2CEIntra3 [REP5-189]. In summary, ESC is in full agreement with SCC. There is a level of uncertainty in the intra-project cumulative assessment that warrants a precautionary approach, thus indicating a need to classify the effects as major rather than moderate. Whatever the final view is on the appropriate category of effect, both are significant and so the decision maker will need to put material weight behind those effects whether it is properly categorised as moderate or major on a precautionary basis.</p>
<p>8.2 Matters relating to the application of the mitigation hierarchy</p>	<p>ESC confirmed that it has no specific requests for further mitigation measures to be identified for intra-project cumulative effects at this stage, but notes that this is on the basis that the mitigation for individual topic areas is adequate and does operate to minimise effects as per the requirement of paragraph 3.1.2 of NPS EN-1.</p> <p>Before you get down to the mitigation and compensation levels of the hierarchy, one needs to avoid, and then reduce the effects. The cumulative assessment on residential receptors, for example, in the Suffolk Intra-Project Cumulative Effects ES Chapter [APP-059] identifies a significant intra-project cumulative effect arising from visual, noise and vibration, health and wellbeing, and traffic and transport effects during construction. Each of these sources of effect (except visual) may be reduced by, for example, more constrained core working hours. Those building blocks are essential to fulfil the policy requirements of reducing effects even before you get to the considerations of mitigation or compensation. Therefore, whilst ESC does not put forward any specific further</p>

	mitigation measures in the context of cumulative effects, this is predicated on the Applicant proposing further mitigation, as requested by ESC, for individual topic areas.
<b>9. Marine Physical Environment</b>	
9.1 Update on additional sediment modelling	No comment.
9.2 Effects on the Coralline Crag and coastal processes, the need for requirements to secure a minimum depth of burial and exit location, and any other mitigation	<p>ESC is content with the commitment to exit to the east of the Coralline Crag, but agrees with the ExA's suggestion at ISH3 that the draft DCO must match that intention.</p> <p>ESC noted in response to ExQ2 Question 2GEN17 that a 25m burial depth would <i>just</i> meet the lower end of ESC's desired depth. As discussed at ISH3, ESC would welcome the Applicant reviewing the drafting of the DCO/REAC to secure this minimum depth of burial. ESC has provided wording for a DCO Requirement to secure the submission of a landfall construction method statement and landfall monitoring plan to ESC for approval post-consent in response to ExQ2 Question 2GEN17. <a href="#">[REP5-189]</a>. Either an Outline Landfall Construction Method Statement, or the Requirement itself, would also secure the depth of cable burial under the <i>contemporary</i> level of nearshore and foreshore to an absolute minimum of 25m, but preferably 30m due to the historical analysis of coastal process data and as a precautionary approach to managing accelerating rates of future coastal change.</p>
9.3 Use of pneumatic casing	ESC has no specific comments to make on the use of pneumatic casing, other than to advise that such use needs to be properly impact assessed. ESC provided comments on the use of pneumatic casing in response to ExQ2 Question 2PE1 <a href="#">[REP5-189]</a> .

9.4 River Stour channel migration and mitigation including scope of monitoring	ESC defers to Kent authorities.
<b>10. Noise and vibration</b>	
10.1 Construction noise effects and mitigation	ESC has been requesting that the Applicant commit to the use of Section 61 Control of Pollution Act (CoPA) applications for all works. ESC set out proposed wording in this respect for inclusion in the Outline Construction Noise and Vibration Management Plan in its response to ExQ2 Question 2NV3 <a href="#">[REP5-189]</a> .
10.2 Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable	<p>In relation to operational noise, ESC requests 5dB below background, based on BS4142 which provides that below background is indicative of a low impact. ESC acknowledges the difficulties in achieving this for a project of this size in a low background sound level area. ESC does, however, require the Applicant to propose an operational noise limit. The Council does however require is that an operational noise limit is proposed. 34 dB has been suggested, but ESC needs to know that this is the lowest achievable rating level that the current design can achieve, and that it accords with policy in terms of LOAEL and SOAEL.</p> <p>For ScottishPower Renewables' EA1N and EA2 projects, the LOAEL and SOAEL were set in line with BS4142 with greater than +5db being the LOAEL and greater than +10db being the SOAEL. Similarly, LionLink has committed to that. ESC is unsure where 34 dB sits in terms of LOAEL and SOAEL, and so, on the basis of the information provided to date, ESC cannot be satisfied that a 34 dB operational noise limit does indeed satisfy policy. ESC therefore requests that the Applicant provides additional information to justify a 34 dB operational noise limit. If 34 dB is the lowest that can be achieved, this needs to be justified, and ESC requires a commitment to go lower if possible at detailed design stage, which is a commitment that has been made by other projects including EA1N and EA2.</p>
<b>11. Air quality</b>	
11.1 Traffic emissions assessment	ESC noted at ISH3 that it is possible that revised traffic modelling could affect the data used to underpin the cumulative emissions assessment or impact the conclusions of significance in relation to vehicle emissions, but it would need to review any further modelling before coming to a firmer judgement. ESC's current position is that it is comfortable with where matters lie in terms of air quality and emissions from traffic.

	<p>Regarding the diversion of traffic through Saxmundham, ESC has provided comment on this from an air quality perspective in response to ISH3 Action Point 64.</p>
<p>11.2 Operational back-up generator assessment including, but not limited to, potential for eutrophication impacts and cumulative effects with SPR proposals.</p>	<p>ESC notes that the Applicant is intending to clarify whether there will be back-up generators in Suffolk. If there are, ESC requests that REAC commitment AQ11 is applied to Suffolk.</p>
<p>11.3 Air quality mitigation measures including enforceability and water for dust suppression in Suffolk</p>	<p>ESC noted that it is content with the content of the Outline Air Quality Management Plan.</p> <p>The Applicant has made provision for water dust suppression as a key measure for dust mitigation for the construction phase of the project. Whilst this is accepted as a standard method for controlling dust associated with construction work ESC would like the Applicant to demonstrate that they have access to sufficient water supply to provide adequate dust suppression. This is particularly key given the significant amount of earthmoving and ground disturbance required to deliver the project and the soil types present in the district which are often friable and prone to dust generation if not well controlled.</p> <p>The issue of how the Applicant intends to secure sufficient water supply for dust suppression is an area of concern for ESC, particularly in the context of multiple NSIPs in the area. ESC would therefore welcome further detail from the Applicant in this regard. Other projects in the district have had significant issues with water scarcity and as an example Sizewell C, albeit with different water supply requirements, has put in place multiple measures to ensure water supply from ground abstraction to storage lagoons. SZC have also employed other more novel measures such as soil stabilisation, along with more traditional planting plans for long term soil depositions and storage due to the scarcity of water. ESC would like to understand how the Applicant intends to ensure sufficient water supply to adequately control dust and ensure that not only do supplementary measures exist, but that they are available to the project and its contractors to control and suppress dust as required.</p> <p>Given water supply is relatively scarce in the area, ESC does not yet have confidence that the Applicant will be able to secure a sufficient supply. ESC is therefore seeking further justification that they will be able to do so. From what the Applicant has said, it appears that they are not yet in a position to do that given they have not yet engaged with</p>

	the supply chain in this regard. It may well be the case that they find the market to be constrained, and so it is concerning that this work has not yet begun.
<b>12. Ornithology</b>	
<p>12.1 Update on red-throated diver displacement assessment</p> <p>12.2 Seasonal restriction for all activities including pre-lay grapnel run</p> <p>12.3 Application of a 2km buffer for vessel displacement</p> <p>12.4 Potential derogation and compensation in respect of emergency repairs</p>	ESC defers to Natural England.
<b>13. Ecology and Biodiversity</b>	
13.1 Whether the potential disturbance effects of terrestrial unexploded ordnance have been sufficiently addressed in the applicant's ecological assessments	ESC does not consider that the ecological assessment of terrestrial UXO impacts and the subsequent necessary mitigation measures have yet been fully addressed. As set out in its response to ExQ2 Question 2ECOL5 at Deadline 5 <a href="#">[REPS-189]</a> , ESC considers that there is still a risk that UXO could be encountered as part of the HDD works under the Leiston-Aldeburgh SSSI and that mitigation measures to address this need to be identified as part of the REAC. ESC understands that the Applicant is continuing to work with the RSPB and Natural England on this matter, with further information to be submitted at Deadline 6. ESC will provide further comments as any additional information is made available.

<p>13.2 Mitigation for riparian mammal activity</p>	<p>No ESC comment.</p>
<p>13.3 Bats including, but not limited to, update on Natural England licensing team barbastelle bat discussions, use of hedgerow gaps vs HDD (including evidence of programme constraints) and mitigation for Daubenton's bats in Pegwell Bay</p>	<p><u>Created hedgerow gaps vs HDD for hedgerow crossing points</u>  ESC considers that its comment on the lack of demonstration that the Applicant has considered avoiding hedgerow removal through the use of micro-siting, HDD or similar trenchless construction techniques remains. This is as set out in section 3.4 of its ISH2 post-hearing submission [REP4-117] submitted at Deadline 4. ESC welcomes the discussion on this point at ISH3 and notes that the Applicant advised that it would consider this matter further, including what additional measures can be implemented to further reduce hedgerow crossing removal widths, for Deadline 6. ESC will provide further comment on this matter following review of the additional information.</p> <p>In this section the Applicant also made reference to in-construction monitoring of hedgerow crossing points to ensure that they continue to be used by bats. ESC requests that this specific monitoring measure is included as part of the OLEMP, alongside the pre-construction survey methodologies and other in-construction monitoring surveys. We recommend that the use of thermal night vision aids (NVAs), along with paired static detectors and surveyor observations would be an appropriate, and relatively commonly used, methodology for surveying crossing points. NVAs used for this purpose must be of sufficient minimum specification (resolution, refresh rate and thermal sensitivity) for the survey distances involved.</p> <p><u>Hedgerows Potentially Important for Foraging/Commuting Bats</u>  Whilst acknowledging that the Applicant is seeking to mitigate each hedgerow crossing as though it is important, ESC remains concerned, as set out in section 3.4 of its ISH2 post-hearing submission [REP4-117], that the Applicant's survey methodology means that ESC has no way of knowing which hedgerows are actually important. This is of concern to ESC given there can be difficulties implementing those mitigations.</p> <p>ESC advised at ISH3 that due to the survey methodology that the Applicant has implemented (targeting surveys only on a certain number of hedgerows), it cannot be ascertained which hedgerows are actually important for foraging/commuting bats. ESC explained that further survey effort would provide a general picture of all the bat species that are using all of those hedges, thus indicating if the hedges are important for bats generally. If barbastelle are targeted for tracking and tagging, this will tell you which hedgerows are important for barbastelle. These are therefore two different techniques that will provide two slightly different outcomes.</p>

	<p>At ISH3, at the ExA's request, ESC committed to providing its consideration of hedgerows crossed by the project which may be potentially important to foraging and commuting bats. This is included in East Suffolk Council's response to Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues held on Wednesday 25 March to Friday 27 March 2026 submitted at Deadline 6.</p>
<p>13.4 Pegwell Bay and former hoverport access and disturbance</p>	<p>ESC defers to the Kent local authorities.</p>
<p>13.5 Control of activities under requirements 5 and 6, including consideration of whether the outline landscape and ecological management plan should contain more specific survey methodologies (or provision to secure this detail)</p>	<p>ESC notes the applicant's commitment to provide additional detail on pre-commencement survey methodologies in the updated OLEMP at D6 (2ECOL3 - Applicant's Responses to Second Written Question [REP5-135]). We welcome the opportunity to provide further comment on this detail when it is available. ESC maintains that it is essential that the OLEMP includes detail of the pre-commencement survey methodologies to be implemented so that it is clear to all stakeholders what work needs to be undertaken. Including the detail of these methodologies in the OLEMP is particularly important as most, if not all, of the surveys need to be undertaken before pre-commencement site clearance works (allowed under Requirement 5) are carried out. If the detail of the necessary surveys is left to be agreed via the discharge of the LEMP under Requirement 6, then the site clearance works could have occurred before the trigger for discharging the LEMP is reached.</p>
<p>13.6 Biodiversity net gain including, but not limited to, an applicant update on progress with legal agreements and details of proposals</p>	<p>ESC remains concerned that this late in the examination process the Applicant's BNG proposals continue to lack clarity, including over the potential split between onsite and offsite BNG provision, the mechanisms through which onsite BNG will be secured and monitored, and the mechanisms through which offsite BNG will be secured and delivered. At ISH3, the Applicant made reference to using a Unilateral Undertaking (UU) to secure BNG delivery and to a National Grid procurement process for obtaining offsite BNG. ESC made the following points in relation to these:</p> <ul style="list-style-type: none"> <li>Proposed UU – ESC requests a copy of the current draft of the UU Heads of Terms as soon as possible so that it can review and comment on it. Notwithstanding this, ESC considers that a UU is not the appropriate mechanism to secure the necessary BNG obligations. Instead, a S106 agreement is required to enable ESC, as the Local Planning Authority, to secure the necessary monitoring mechanisms and financial contribution for onsite BNG. These are required to enable the LPA to meet its Biodiversity Duty under section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). ESC can now confirm that it did receive the draft unilateral undertaking on Friday 10<sup>th</sup> April, but evidently this provided insufficient time for ESC to be able to return comments to the Applicant ahead of Deadline 6 (Monday 13<sup>th</sup> April).</li> </ul>

	<ul style="list-style-type: none"> <li>• National Grid BNG procurement process – whilst in principle ESC welcomes a standardised procurement process for offsite BNG, ESC maintains reservations that it may be overly complex or bureaucratic for BNG Habitat Banks to engage with. ESC would be happy to provide the Applicant with its experience of the offsite BNG market to date, including as the only LPA in Suffolk to have signed legal agreements with landowners to create BNG Habitat Banks in the district (two at the time of this response, with a further two expected to be signed shortly).</li> <li>• Whilst ESC welcomes the Applicant’s previous commitment to deliver all BNG related to the Suffolk part of the scheme in Suffolk, it is considered that this must form part of the legal agreement and the procurement process. Preference must be strongly weighted to delivering offsite BNG in East Suffolk, then the rest of Suffolk, in order to ensure that gains are being delivered in the same locality as the losses.</li> </ul>
<b>14. Any other business</b>	
No comment.	
<b>15. Close of hearing</b>	
No comment.	

## **Appendix A – ESC’s comments on the Applicant’s Deadline 4 and Deadline 5 submissions relating to socio-economics**

ESC has long-standing concerns regarding the capacity for the available serviced and non-serviced visitor accommodation and private-rented sector in East Suffolk to accommodate the non-home-based (NHB) workforce, without causing harm to residents and the local visitor economy. ESC expressed its concerns in its Local Impact Report [REP1-128] (for example, see Section 7.8.6, page 76-77), and has since expanded on these in its comments on the Applicant’s Visitor and Tourism Assessment Technical Note – Suffolk ([REP4-184], pages 8-16).

The Applicant’s assessment is predicated on the unrealistic assumption that its workforce demand can be considered in isolation. In practice, there is a single, finite accommodation market serving the needs of both the residents and tourism sector in East Suffolk. The cumulative impact of multiple projects within East Suffolk remains a chief concern, and this view is increasingly supported by the demonstrable impact of the Sizewell C development; even though it remains at an early stage of construction.

The Applicants assessment of accommodation availability during the construction period remains theoretical and it is unclear how, in practice, any additional competition from NHB Workers will affect residents and visitors’ ability to secure accommodation locally.

ESC has reviewed and commented on the Applicants responses to the following documents below:

- a. [REP4-237]: Applicants Response to AP104 from ISH2.
- b. [REP5-135]: Applicants Response to ExQ2.
- c. [REP5-136]: Applicants Responses to Second Written Questions – Appendices
- d. [REP5-115]: Register of Environmental Actions and Commitments (REAC).

### **1. ESC Comments: Applicants response to AP104 from ISH2 [REP4-237]**

Limited resources mean that ESC has not been able to fully address and provide qualified comment on the Applicant’s response to AP104 from ISH2.

However, ESC urges caution and is wary of the Applicant’s conclusion that *‘there is likely to be capacity within the private rental accommodation sector for construction workers of cumulative schemes that require accommodation’*.

ESC is concerned that any over-reliance on private-rented accommodation to house NHB Workers introduces an unforeseen risk of affecting the availability and affordability of housing locally, consequently leading to the displacement of East Suffolk residents.

ESC will approach its own Housing Team for comment on the methodology, assumptions and conclusions within the Applicant’s response.

### **2. ESC Comments: Applicant's Responses to Second Written Questions [REP5-135]**

[2SERT1]: *Tourism Accommodation Figures*

ESC appreciates the Applicant’s response and has made the following observations.

ESC's Deadline 4 submission [REP4-184], by necessity, had to draw on the findings of ESC's own East Suffolk Hotel & Visitor Accommodation Study. A study commissioned independently of the Proposed Project and undergoing final editorial review at the time of the Sea Link Examination.

ESC acknowledges that there will be inherent differences in the design and methodology between the two studies including the 'origin point' from which the 60-minute drive-time is calculated, as well as the time of day or traffic conditions used to generate the drive-time catchment.

Together these differences will affect the findings of the two studies. However, ESC remains surprised at the variance in serviced accommodation stock as illustrated by the Applicant in Appendix D [REP5-136]. ESC is also surprised that the Applicant did not include non-serviced accommodation within their original analysis despite their stated assumption that NHB workers are likely to choose cheaper accommodation whilst working on the proposed project.

ESC remains unconvinced that NHB workers have a preference to share rooms within serviced accommodation, and whether they have a preference between Serviced and Non-Serviced visitor accommodation.

The Applicant has identified that a lack of inclusion of non-serviced accommodation within the ES assessment has potentially led to an underestimation of the total available tourist accommodation available within the 60-minute drive-time catchment that could be used by construction workers.

The Applicant's assessment that their own accommodation study may have underestimated the total available tourist accommodation available does not help their argument. ESC maintains that irrespective of the total tourist accommodation stock, it is the availability of accommodation for use by visitors and NHB workers that is important. Both groups are likely to compete for the same accommodation, especially during the peak tourist season, leading to the potential displacement of either group, through the scarcity of supply, and price inflation.

#### *[2SERT2]: Affordability of Accommodation*

When considering the affordability of accommodation, the Applicant has stated that "National Grid agree that construction workers will not be utilising the tourist accommodation in the Suffolk coastal area because it is not affordable to workers and there are far lower cost options available".

This statement conflicts with the Applicant's previous analysis of Accommodation requirements for NHB Workers. Additionally, if the Applicant is confident that NHB Workers will not be using tourist accommodation in the Suffolk Coastal area, then there would be little need to have included local tourist accommodation within their analysis.

If decisions relating to the choice of accommodation are influenced by its proximity to a worker's place of work and the affordability of accommodation, then ESC believes that NHB workers are likely to consider low-cost accommodation, such as non-serviced accommodation, that is close to their place of work, thereby reducing commuting time and travel costs. Logically, this might include accommodation within East Suffolk.

Whilst the Applicant may be able to control the accommodation choices of their direct employees, the Applicant would have less influence over their contractors when seeking to reduce the impact of NHB Workers on tourist accommodation.

ESC believes that there can be no absolute certainty or control over where NHB Workers will seek accommodation, or the type of accommodation they will choose. The reality is likely to include a broad range of locations and accommodation type throughout the construction period.

Therefore, ESC recommends that appropriate working groups, whether established or newly created, are tasked to work with the Applicant to develop forward looking monitoring and mitigation programmes that help all stakeholders understand the supply, demand, and potential issues within private rental, serviced and non-serviced accommodation sector during the construction period, enabling the resolution of issues before they arise.

*[2SERT3]: Cumulative Worker Accommodation*

ESC welcomes the Applicant's mapping and analysis of peak demand for worker accommodation across cumulative schemes in East Suffolk and appreciates the challenges of assembling worker information and phasing across the cumulative construction period, especially when some schemes have yet to be consented and all schemes may be subject to schedule variance where a project is delivered either ahead or behind schedule.

ESC is not in a position to determine whether October 2028 represents an appropriate choice of peak cumulative demand for construction workers, whether the Applicant's assessment that peak cumulative demand is unlikely to overlap, or whether the cumulative construction workforce and baseline accommodation assumptions are accurate.

However, the Applicant's assessment, assuming a worst-case scenario where peak accommodation demands from cumulative schemes coincide, indicates that 'no capacity would remain within serviced visitor accommodation, and the PRS [Private Rental Sector] would be required to absorb the cumulative demand'.

Admittedly, the non-serviced accommodation has the potential to alleviate demand stress on the serviced and private-rented sector, but ESC remains concerned that irrespective of the worst-case scenario assessed, there remains the possibility of limited availability of accommodation across all types during the construction phases of the cumulative schemes, especially during peak visitor periods.

Additionally, the health of the private rental sector in East Suffolk has not been assessed by ESC and as previously stated, ESC is concerned that any reliance on private rented accommodation to house NHB Workers would affect the availability and affordability of housing for East Suffolk residents.

*[2SERT4]: Monitoring and Adaptive Management*

ESC would welcome the Applicant working with local stakeholders and committing to monitoring of tourism impacts (including monitoring of worker and tourism accommodation) and potential adaptive management during the construction phase, both for the proposed development and cumulatively with other projects.

A key concern for ESC remains the potential cumulative negative impacts of multiple schemes on the availability of tourist accommodation and the consequent effect on the visitor economy.

However, it is not only the impacts on tourist accommodation that are a concern. ESC has previously demonstrated that the visitor economy is a complex system and that its success is a product of multiple factors which contribute to the visitor experience. These can include, for example, environmental factors such as landscape and visual, traffic and transport, noise and vibration and cultural heritage. All of which are within scope of the Applicant's Environmental Statement but fall out of scope for the purposes of the socio-economics and tourism assessment.

Monitoring of the visitor economy falls to ESC and local stakeholders, and whilst local monitoring systems are becoming increasingly sophisticated, they remain limited. The tourism sector is still

exposed to the unforeseen or unexpected events such as those potential cumulative inter-project effects expected in East Suffolk over the next decade.

Importantly, the mechanisms by which ESC and local stakeholders can engage with developers during the construction period need to be developed. It is only through the establishment of effective feedback loops informing all stakeholders that appropriate mitigation activities including adaptive management can be developed and executed.

ESC has welcomed the SE05 commitment within the REAC [REP5-115] but requests that further consideration be given to the mechanism for liaising with local stakeholders and that the Applicant works with local stakeholders to develop the detail behind the commitment.

ESC, SCC, and local industry representatives met with the Applicant on the 1<sup>st</sup> of April to discuss a revised commitment which the Applicant intends to submit by Deadline 6.

*[2SERT5]: Skills and Employment Plan*

ESC and SCC received a draft copy of the Sea Link Skills, Supply Chain, and Employment Plan from the Applicant on 19 March. This was followed by a meeting with the Applicant on 23 March where the content was discussed. ESC and SCC provided feedback on 8 April.

The Applicant will submit a revised plan by Deadline 6.

**ESC Comments: Applicant's Responses to Second Written Questions – Appendices [REP5-136]**

*Appendix D: Tourist Accommodation Stock by type as presented by ESC and for the Suffolk Onshore Scheme*

ESC has commented on the Applicant's response to ExQ2 2SERT1 above.

However, it is worth re-iterating that design difference between the ESC and Applicant accommodation studies can, to a certain extent, explain the variance in findings of serviced accommodation count within the two studies.

*Appendix E: Suffolk Coastal Accommodation Analysis to Support REAC Commitment SE05 and Response to Written Question 2SERT4*

ESC welcomes the Applicants initial commitment and together with SCC met with the Applicant on 1 April to discuss the Applicant's SE05 REAC Commitment [REP5-115].

All parties agreed that there is value in a collaborative approach to monitoring the potential tourism impacts, of the proposed project and discussed how this could work in practice. The Applicant agreed to review their SE05 REAC Commitment and submit the revised document by Deadline 6.

**ESC Comments: Register of Environmental Actions and Commitments (REAC) [REP5-115]**

ESC appreciates that following a meeting with the Applicant on 1 April, the Applicant has agreed to review the content and consider the mechanism by which the commitment can be delivered. ESC refers to this within this ISH3 Post-Hearing Submission.

Therefore, the following abridged comments reflect the earlier ESC position at ISH3:

- Monitoring of worker accommodation needs to be shared with those previously mentioned stakeholders and inform supply/demand/occupancy forecasts that contribute to mitigation planning.

- ESC believes that the wording of the commitment needs more firm commitments rather than “will consider” or “could include”.
- ESC considers the utilisation of a trigger point, irrespective of its value, is only part of the solution. It can also be interpreted as a reactive or retrospective approach to the problem.
- ESC recognises the economic benefits that NHB Workers bring to East Suffolk and that during the ‘low season’ accommodation providers would welcome the opportunity to fill any spare capacity. It is a matter of balance.
- ESC would welcome a more joined up approach and would strongly support discussions with other local developers and whether the use of specialist accommodation, park and ride, or transport facilities could be forthcoming to collectively resolve the cumulative impact.
- ESC would welcome the opportunity to establish local Governance and Working Groups to monitor and shape delivery of the Applicant’s commitment.
- ESC is of the opinion the Applicant has not provided any specific mitigation for example they have not explained transparently ‘how’ they expect to manage worker demand, whilst protecting tourist accommodation.

In essence, the measure does not prevent displacement; it merely observes it and leaves any response optional. This falls materially short of what is required to provide confidence that tourism impacts will be avoided.

The Applicant assumes that workers will avoid tourist accommodation due to cost. However, it accepts that some workers will use booking systems to secure hotel rooms, and acknowledges challenges in securing workforce, which increases pressure to provide convenient accommodation. In practice, workers, particularly higher-paid or specialist staff, are likely to prioritise proximity to site, contractors are incentivised to secure accommodation close to site, and market behaviour, not policy assumptions, will determine outcomes. This is already being seen in relation to Sizewell C, where contractors have block booked accommodation, paying above agreed subsidy rates and securing rooms in competition with tourists.

Accordingly, there is a clear and realistic risk that contractors will secure and prioritise local accommodation, including visitor accommodation, irrespective of the Applicant’s assumptions. The Applicant has indicated that, for security reasons, it will not disclose where workers are located. This raises a critical issue in that if workforce accommodation locations are not disclosed, there is no way to independently verify whether tourism accommodation is being used, undermining the credibility of monitoring, and any confidence in compliance with mitigation measures.

In summary, the Applicant’s case on visitor accommodation is not robust. It is characterised by a reliance on partial and inconsistent data, assumptions about worker behaviour, a lack of a defined or secured accommodation strategy, no effective control over contractors, reactive and non-binding mitigation, and limited transparency preventing verification. Accordingly, there is no reliable or enforceable basis on which the decision-maker can be satisfied that the development will not result in displacement of tourists or harm to the local tourism economy. In the absence of a clear and secured strategy, this matter should be treated as giving rise to a likely significant adverse effect, to be weighed accordingly in the planning balance.