Suffolk County Council

SEA LINK

EN020026

Response to Examining Authority's Action Points from Issue Specific Hearing 3

Suffolk County Council

[redacted]

Deadline 6
13 April 2026

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Glossary of Acronyms

DCO	*Development Consent Order*
EA	*Environment Agency*
ES	*Environmental Statement*
ISH3	*Issue Specific Hearing 3*
LLFA	*Lead Local Flooding Authority*
NPS	*National Planning Statement*
NSIP	*Nationally Significant Infrastructure Project*
PPA	*Planning Performance Agreement*
PRoW	*Public Rights of Way*
REAC	*Register of Environmental Actions and Commitments*
SLR	*Sizewell Link Road*
TRO	*Traffic Regulation Order*

"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 the Examining Authority's Action Points from Issue Specific Hearing 3 (ISH3) held in March 2026. Examination Library references are used throughout to assist readers. Appendices A and B to this document have been submitted separately.

Response to ExA Actions Points from Issue Specific Hearing 3 (ISH3)

No	Action Point	SCC Response
General		
1.	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary	SCC has submitted its response to this Action Point as Appendix A to this document which sits as a separate submission. That document sets out proposed changes and additions to the draft DCO not otherwise included in SCC's Deadline 6 submissions.
Water Environment		
3.	Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk.	The SCC, LLFA is still concerned regarding the applicants' proposals to include temporary surface water drainage storage within fluvial flood zone 3a. The applicant needs to clearly demonstrate that during a storm event, the temporary surface water drainage storage solution can: - a) operate as designed to the 1:100 storm event. b) not be affected by fluvial flood water. c) not increase flood risk elsewhere. d) mitigate any loss of fluvial flood storage.

No	Action Point	SCC Response
4.	Confirm if any wider sustainability benefits to the community are deemed necessary to outweigh flood risk as per NPS EN1, section 5.8.11. In answering, provide full reasoning for your position and, if necessary, drafting for the DCO and/or Register of Environmental Actions and Commitments (REAC) suitable to secure.	If the changes requested by SCC to the Drainage Strategy are fully adopted, SCC does not see that there will be a substantial increase in Flood Risk. However, doubt remains over the level of increase in Flood Risk from the temporary storage of materials which may be in areas of medium or high risk of surface water flooding and in relation to temporary accesses in those areas. SCC considers that if it is the case that certain people will experience increased flood risk as a result of the proposed project from these sources, those people should experience benefits of some kind as part of meeting the criteria of "wider sustainability benefits" as considering how social benefits and burdens are distributed should be a consideration of sustainability. This could be in the form of general compensatory activities, or a targeted commitment to those who fall in this category. For instance, a commitment to community benefit beyond that which is already committed to by the Applicant under its license with Ofgem, targeted at residents in proximity to the sites of the onshore infrastructure could satisfy 5.8.11 of EN-1. SCC has not been able to produce drafting to secure this but will consider doing so at Deadline 7.
Traffic and Transport		
6.	Provide a written summary of the A12 works, setting out what is currently happening and what more is planned	From south to north

No	Action Point	SCC Response
	over the next few years. SCC to also set out if these works could benefit the proposed development, particularly the construction phase.	A12/B1078 Wickham Market. Construction of the access to the southern park and ride will be complete by the end of Q2 2026. It is art operational as a P&R and as such there will be additional traffic using the site resulting in delays to other road users. It is not regarded as a significant factor for Sealink as little construction traffic is expected to use this road. A12 N end of Wickham Market Bypass. Surfacing work will commence in April for 3 to 4 weeks. The speed limit will be reduced to 50mph (subject to successful TRO). The impact on Sealink traffic is considered to be neutral as the slight delays due to the speed limit are likely to be offset by greater consistency due to improved safety and impact of other works. A12 Marlesford: Footway improvements and associated traffic management will create some delays in Q2 2026. If implemented a reduction in speed limit from 40mph to 30mph will result in a small increase in journey time at this location. A12 Little Glemham: Implementation of a pedestrian crossing will have a short-term delay in Q3 or Q4 2026 during construction but little afterwards. Of greater potential impact will be strengthening of the culvert under the A12 but the scope of repairs and timing has yet to be determined. Two Village Bypass. A program for construction and tying in of the southern roundabout has yet to be provided. Whilst the

No	Action Point	SCC Response
		roundabout is being built offline it will need to connect to the A12 which may cause some delays but will be complete by Q4 2027. The TVB will replace a section of the A12 that is restricted to 30mph so will reduce journey times. The A12/A1094 Friday Street Roundabout was open on the 30th March 2026 with final completion forecast on 20th July 2026. During this time there will be temporary speed restrictions which may cause be delays but once complete should improve journey times be smoothing flows, partially for traffic turning in and out of the A1094. SLR (West Roundabout) A program for construction and tying in of this roundabout has yet to be provided. Whilst the roundabout is being built offline it will need to connect to the A12 which may cause some delays but will be complete by Q1 2028. A12/B1122 Yoxford Roundabout was opened on the 31st March 2026 and due to complete at the beginning of July 2026. Until then some traffic management restrictions such as narrow lanes will remain but once fully open should smooth traffic flows albeit with a neutral impact on journey times. Northern Park and Ride, Darsham: The roundabout is open, but some work is still required to tie into the existing A12. Once open there may be a slight additional delay due to a reduction of speed from derestricted to 40mph.

No	Action Point	SCC Response
		All the above may require road closures but these are either overnight or weekends. The latter may impact the Sealink project due to working full days on Saturdays and Sundays. Further SZC specific information is available at https://one.network/ And for all roadworks at https://one.network/
7.	SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6.	Wait for minutes from Sealink but note concerns from SCC that scope does not include A12. In SCC's view insufficient time is left to do a forward-looking assessment particularly as the construction traffic and phasing of the various NSIPs will need reviewed to identify the realistic worse case cumulative impact (which may be transient across time and space) before undertaking an assessment. A real-time, backward-looking assessment to see changes in journey time and delays would be easier to achieve but an issue would remain to disassociate individual scheme impact albeit this may be possible by reviewing monitoring data.
9.	Respond to the submitted document 9.107 Applicant's Response to SCC's DL4 Submission on Alternate Access to Saxmundham Converter Station.	SCC has provided this response in its Comments on Deadline 5 submissions submitted at Deadline 6.

No	Action Point	SCC Response
11.	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	If the SoS considers that EN-1 5.14.15 '*The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;* Is applicable to HGV movements for this project. SCC's view is that caps are necessary to ensure that the impacts are no greater than that assessed in the ES and TA by limiting HGV movements to those assessed in those documents. Otherwise, there are no clear measures to prevent the undertaker exceeding the traffic volumes and causing impacts of a scale that have not been assessed. The applicant has full control of what traffic volumes are considered in the assessments and have reassured the authority that these are realistic worse case and will not be exceeded and hence caps should not hinder delivery of the work to programme. To do otherwise would devalue the process of assessment in the view of the authority and most likely the local community. A methodology of applying caps would be to relate these to specific routes, as for SPR EA1(N), EAS2 and SZC and will also allow the cumulative impacts to be kept within the boundaries of what has been accessed (notwithstanding SCC comments regarding the cumulative impact of traffic).

No	Action Point	SCC Response
		1.1 A12 north (Lowestoft to A1094 Friday Street): maximum of 173 daily movements (50% of 346 movements) [1,2] 1.2 A12 south (Seven Hills to A1094 Friday Street): maximum of 294 daily movements (85% of 346 movements) [1,2] 1.3 A1094/B1069 (from the A12 to the site entrance south of Knodishall): maximum of 176 HGV daily movements [1] 1.4 B1121 (from the A12 to the River Fromus compound): maximum of 164 HGV daily movements[1] 1.5 B1119 from Saxmundham east, a maximum of 10 daily HGV movements[3] 1.6 B1122 from Aldeburgh north, a maximum of 10 daily HGV movements[3] Note 1: calculated from 5.4.4 of the OCT&TP REP5-064 with 2: proportional splits in 5.4.8. 3: understood to be applicants' commitments in Issue Specific Hearing 3. B1121 / B1119 from the River Fromus compound access through Saxmundham: Due to the capacity issues at the

No	Action Point	SCC Response
		B1121/B1119 signal controlled junction at Saxmundham and the limited mitigation possible at the location that no construction traffic uses this route. However, if PINs / SoS consider that due to the importance of this project that use by construction traffic is unavoidable SCC would accept a cap of 10 HGV movements (5 deliveries) a day subject to both this and light movements being outside network peak hours (ie 0700-0900 and 1600-1800). This should, together with the necessary monitoring and enforcement, should be included within the CTM&TP. This was the approach for other NSIPs and has been successful to date. Suitable wording can be based on that for the SPR EA2 OCTMP https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010078-005087-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan.pdf
12.	Respond on the 10 HGV cap proposed by the applicant for the signalised junction in Saxmundham.	See response to AP 11.
13.	The Construction Traffic Management Plan says the applicant has a preference for Option 1 (repairing or strengthening the existing bridge). Is this a strong enough form of wording? Should it be that if Option 1 is fully	SCC considers its previously made points on the reduced adverse effects, added resilience and benefits from Option 1 justifies a stronger commitment than mere preference for Option 1 to be undertaken. Drafting of such a commitment which could

No	Action Point	SCC Response
	available then the applicant commits to taking this option ahead of the other options?	be included in the CTMTP and/or REAC is given below. The commitment is designed to allow for the flexibility in terms of allowing a different option to be implemented (such as the mini-bridge option) prior to repair of the bridge provided that Option 1 is sought when timescales allow it. The wording also sets out the conditions which mean the Applicant is not expected to do Option 1, in which case the Applicant will seek agreement from the LHA to replace the bridge following the construction period to ensure, at least, that the aforementioned long-term benefits are secured even if Option 1 is not feasible. *The Applicant must implement Option 1 (repairing or strengthening the existing bridge) only, unless –* 1. *doing so would disproportionately delay the construction programme, in which case the Applicant may implement another Option until such time that, acting reasonably, the Applicant can implement Option 1 without such delay; or* 2. *information comes to light demonstrating that Option 1 is technically unfeasible, the agreement of the required parties cannot be obtained, or otherwise can only be implemented at a disproportionate and unreasonable cost and the Applicant has satisfied the local highway authority this is the case.*

No	Action Point	SCC Response
		If, for the reasons set out in paragraph (2), the Applicant has not implemented Option 1, following the end of the construction period, the Applicant will replace the existing bridge, subject to the agreement of the local highway authority and obtaining all necessary consents.
14.	Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.	Prohibition of construction traffic using S-BM-09 River Fromus Compound during closure for the temporary overbridging or bridge repairs would prevent adverse impacts in Saxmundham and could be secured in the OCTM&TP. SCC Highways 7.2.17 SCC Highways has previously raised the following concerns with respect to the usage of Benhall Railway Bridge by AILs associated with the Proposed Project: 1.7 Structural capacity of existing bridge specifically the weight restriction. 1.8 Feasibility of overbridging due to geometry of bridge and the physical space available to install an overbridge. 1.9 The impact on traffic queuing at the A12 junction during the installation and the use of an overbridge. 1.10 Interaction with Network Rail for the installation and the use of an overbridge.

No	Action Point	SCC Response
		1.11 Highway / surrounding land at Benhall Bridge is not included in the Order Limits therefore there are concerns around carrying out works outside of the DCO. 1.12 Diversion routes and impacts when the B1121 is closed and traffic diverted through Saxmundham 7.2.38 In addition, during any road closures of the B1121 for the project, no ~~HGV~~ construction traffic associated with the Proposed Project* would use diversion routes through Saxmundham. *In this case ' project' taken to be any closure of the B1121 associated with any works, including pre-commencement, that form part of the approved works The diversion route S/RO/D/02 as shown on plan DCO/S/AC/PS/0601 AS-011 is not an acceptable one to SCC and approval of an acceptable route will need to be given by the LHA.
18.	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	This has not been assessed as no changes were made to baseline traffic to reflect any change in route selection or timing of journeys by local traffic. Traffic data taken over the past 2 years shows that traffic has changed on certain routes when compared to that forecast, some increasing, some decreasing.

No	Action Point	SCC Response
19.	If there is anything else the Council's consider is necessary to include within the DCO with regards to traffic and transport matters, include this in your DL6 submission.	SCC is reviewing the contents of the protective provisions first published in REP5-005 before making final comment. Unresolved Matters (OCTM&TP) Core working hours: To exclude Sat pm, Sundays and Bank Holidays. Agreement of the Traffic Management and Monitoring System with the LHA to ensure robust monitoring, reporting and enforcement of HGV and worker movements to comply with those forecast in the OCTM&TP, TA and ES.
20.	Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation.	DL7 as this information only received recently and SCC officer absence.
21.	The ExA requires that the applicant and the highway authorities at SCC and KCC meet to discuss remaining matters of disagreement and try to find a way to progress on these matters as soon as possible. Provide an update at deadline 6.	SCC met with the Applicant to discuss highways matters following ISH 3. A further meeting will be organised to finalise positions and resolve disagreement as far as possible.
22.	With the submission of the junction modelling and the other information submitted by the applicant through this examination, do the Councils now consider that there is a sufficiently robust assessment of traffic and highways	SCC's position regarding the scope of assessment is unchanged considering that as a minimum a sensitivity test is required to

No	Action Point	SCC Response
	issues, both for the proposed development alone and also when considered cumulatively? If not, explain why.	assess the cumulative impact of all NSIP related construction vehicles on the A12 and elsewhere. SCC is still struggling to reconcile the data presented in REP4-099. With that in the SZC Consolidated Transport Assessment. For example, both table 7.1 (early years) and table 7.4 peak years indicate greater volumes of HGVs in the peak hour for SZC alone compared to those presented by the Applicant in Appendix A. For example, a figure of 20 HGV movements in link S_RL1 AS south of A1094 is significantly less than the Early Years of 67 (Main SIte) or 108 (Main site and associated sites), Peak Years 70 (typical day) and 102 (busiest day) shown in the SZC TCA. Table 7.10: Sizewell C early years summary trips - HGV (see table below)

Modelled Hour	Main Development Site				Associated Development Sites											
	SBA		SSE		Southern Park and Ride		Northern Park and Ride		A12 / B1122		Two Village Bypass		Sizewell Link Road		Freight Management Facility	
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
06:00-07:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
07:00-08:00	21	3	22	13	3	0	3	0	1	1	8	1	13	2	3	0
08:00-09:00	21	8	22	16	3	1	3	1	1	1	8	3	13	5	3	1
15:00-16:00	20	13	21	18	3	2	3	2	1	0	7	5	12	8	3	2
16:00-17:00	12	14	17	18	1	2	1	2	1	1	4	5	7	8	1	2
17:00-18:00	7	13	15	18	1	2	1	2	0	0	2	5	4	8	1	2
18:00-19:00	2	11	13	17	0	1	0	1	0	1	1	4	1	7	0	1
Total (modelled hours)	83	61	110	100	11	8	11	8	5	3	30	22	50	37	11	8

<table>
<tr><th>No</th><th>Action Point</th><th>SCC Response</th></tr>
<tr><td></td><td></td><td>
Table 7.4: Sizewell C peak construction summary trips – HGV
<table>
<tr><th rowspan="3">Modelled hour</th><th colspan="4">Main Development Site</th></tr>
<tr><th colspan="2">Typical Day</th><th colspan="2">Busiest Day</th></tr>
<tr><th>In</th><th>Out</th><th>In</th><th>Out</th></tr>
<tr><td>06:00-07:00</td><td></td><td></td><td></td><td></td></tr>
<tr><td>07:00-08:00</td><td>48</td><td>11</td><td>71</td><td>14</td></tr>
<tr><td>08:00-09:00</td><td>48</td><td>22</td><td>71</td><td>31</td></tr>
<tr><td>15:00-16:00</td><td>45</td><td>31</td><td>66</td><td>44</td></tr>
<tr><td>16:00-17:00</td><td>29</td><td>33</td><td>41</td><td>47</td></tr>
<tr><td>17:00-18:00</td><td>19</td><td>32</td><td>26</td><td>45</td></tr>
<tr><td>18:00-19:00</td><td>9</td><td>28</td><td>11</td><td>40</td></tr>
<tr><td>Total (mod. hrs)</td><td>199</td><td>156</td><td>286</td><td>221</td></tr>
<tr><td>Total (24 hrs)</td><td>395</td><td>395</td><td>570</td><td>570</td></tr>
</table>
</td></tr>
<tr><td>23.</td><td>At this point in the examination, do the Council's consider that there would be any impacts to traffic and transport, particularly driver delay, which would be assessed as significant in your view?

If considered that significant adverse impacts would remain after mitigation, is there further mitigation which should be secured? If so, how would this be secured and with what wording?

Would a requirement for the applicant to monitor and if necessary, provide adaptive management/remediation mitigation be sufficient to overcome any concerns that the traffic and transport impacts would be significant? If so,</td><td>SCC remains concerns that the scope of the assessment excluded considering impacts on the A12, specifically the cumulative impacts. Once traffic volumes are close to link and junction capacities even small increases can have a disproportionate impact on journey times and delays. See also Q7.

Mitigation for residual and / or unforeseen transport impacts can be managed and secured in a similar way as Sizewell through a Contingent Effects Fund. See Schedule 16 of the Deed of Obligation.</td></tr>
</table>

No	Action Point	SCC Response
	please provide wording and explain how this could be secured.	
24.	Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.	Industry practice is to undertake surveys and model neutral months. In terms of the Evironmenal Assessment SCC would consider that assessing impacts based on the higher summer traffic flows would be misleading reducing the proportional impact of the project. In terms of junction and link capacity assessments this again should be undertaking using neutral month day. However, a sensitivity test using summer baseline data would be informative to identify junctions or links that are close to or overcapacity in the holidays and hence if any restrictions on construction traffic are justified at these times. For example, data from April 2025 and August 2025 shows an 17% increase in the summer month. to that in April.
Socioeconomic and tourism		
25.	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regard to tourism impacts	SCC has provided wording for a requirement for monitoring of tourism impacts in Appendix A of this document which has been submitted as a separate submission. SCC was unable to seek agreement from the other Councils in time for Deadline 6 but this will be sought for Deadline 7 and any amended wording submitted accordingly.

No	Action Point	SCC Response
27.	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	SCC considers that a Skills and Employment Plan (SEP) could be sufficient to address the Councils' remaining concerns relating to skills, education, employment, labour-market and supply-chain effects, provided that the SEP meets clearly defined requirements and is secured through the Development Consent Order (DCO). For clarity, the SEP would need to be a revised, policy-compliant, mitigation-focused and enforceable. An acceptable SEP must operate explicitly as mitigation for the identified cumulative socio-economic impacts arising from Sea Link in combination with other Nationally Significant Infrastructure Projects (NSIPs) in Suffolk and the wider region, rather than functioning as a benefits-based or corporate social-value document. The Skills, Supply Chain and Employment Plan currently shared by the Applicant does not meet this threshold. The existing document is not mitigation-focused, does not address cumulative impacts, lacks robust workforce and supply-chain modelling, provides no enforceable commitments or local governance arrangements, and relies predominantly on high-level signposting to existing corporate programmes. As such, it is insufficient to address SCC's concerns and cannot, in its current form, be relied upon to mitigate the identified economic impacts.

No	Action Point	SCC Response
		In order to be acceptable, the SEP would need to be grounded in robust evidence, including cumulative workforce modelling and scenario-based assessment, using low, medium and high scenarios for labour availability and displacement, clearly identifying workforce requirements by phase, skill and geography. It would need to demonstrate how cumulative economic impacts would be addressed, including skilled-labour shortages, workforce displacement and churn, competition for supply-chain capacity, pressures on education and training provision, and demand for non-home-based accommodation generated by overlapping NSIPs. The SEP would also need to include a locally co-designed education and training strategy, developed through SCC's Regional Skills Coordination Function (RSCF), setting out clearly how further and higher education institutions and training providers would be engaged to meet project demand and cumulative NSIP workforce requirements. In addition, the SEP would need to incorporate a supply-chain development and mitigation approach that identifies hyper-local, local and regional opportunities, assesses capacity constraints, and mitigates cumulative displacement effects within the local and regional economy. Clear governance arrangements would be essential, including the establishment of formal working groups involving SCC and

No	Action Point	SCC Response
		the RSCF, to enable coordinated delivery, oversight and adaptive management throughout the construction period as project timelines and cumulative conditions evolve. The SEP would also need to contain measurable commitments, alongside monitoring, reporting and review mechanisms, to ensure transparency, accountability and ongoing effectiveness. Crucially, the SEP would need to be secured through a DCO Requirement, so that delivery is enforceable and does not rely on discretionary or voluntary action by the Applicant. Subject to these conditions being met, SCC consider that a compliant and deliverable SEP would represent a proportionate and effective mechanism to mitigate the remaining socio-economic impacts associated with the Proposed Development. SCC has consistently maintained that these impacts are capable of mitigation rather than being inherently unacceptable, and that a robust SEP is the appropriate and proportionate mechanism through which that mitigation should be achieved. Conversely, without such a revised and DCO-secured SEP, SCC would maintain their concerns that the Applicant has not adequately mitigated the cumulative economic impacts of the project. The existing Skills, Supply Chain and Employment Plan, as submitted, does not meet these requirements and is therefore insufficient to address the Councils' concerns.

No	Action Point	SCC Response
30.	Respond to the proposed permissive paths and whether they should be proposed as public rights of way?	SCC has responded to this in response to 3SERT3 of ExQ3
Health and Wellbeing		
32.	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	SCC understands that the Applicant will submit information regarding the intended activities to be covered in the exceptions of Requirement 7 and why they are necessary. Therefore, SCC does not yet have definitive positions on whether any should be omitted at this time. However, SCC has proposed amendments to certain exceptions to better manage potential impacts from the exceptions. In what follows, SCC provides preliminary comments on each of the proposed exceptions: **7.4(a)** – Public Health recommend that this provision is limited to trenchless crossing operations that require continuous construction. **7.4(b)** –Unless the installation/removal of conductors, pilot wires and protective netting across sensitive receptors is demonstrated to be dependent upon being undertaken outside of core working hours, the provision should be removed or

No	Action Point	SCC Response
		amended to require case by case approval to evidence need for out of hours working. **7.4(c)** – Unless the jointing of underground cables is demonstrated to be dependent upon being undertaken outside of core working hours, the provision should be removed or amended to require case by case approval to evidence need for out of hours working. **7.4(d)** – Public Health accepts that there is a need to safely conclude certain activities that cannot be abruptly halted. However, it is important that this provision is not relied upon as a matter of routine due to poor sequencing of works. Construction planning should ensure that activities which cannot be safely paused are not commenced where there is insufficient time remaining within core working hours for their completion or safe cessation. It is therefore recommended that this provision be amended to clarify that it applies only where continuation is genuinely unavoidable, i.e. not as a result of works being commenced with foreknowledge that activity would require continual working that would extend beyond core hours. **7.4(e)** – No comments/objection **7.4(f)** – Testing and commissioning of electrical plant is not inherently unsuitable for core working hours. It is recommended

No	Action Point	SCC Response
		that this provision be amended to allow exceptions to core working hours only where safety implications exist. **7.4(g)** – The current drafting relating to exceptions from core working hours for works delayed or held up by severe weather conditions is considered overly broad and may enable routine or repeated extensions to working hours. Whilst Public Health recognises that severe weather can disrupt construction activities, recovery of programme should in the first instance be managed through effective forward planning, sequencing and resource allocation, rather than by extending working hours which may adversely affect community health and wellbeing. **7.4(h)** – No comments/objection **7.4(i)** – No comments/objection **7.4(j)** – No comments/objection **7.4(k)** – Public Health considers that intrusive and non-intrusive surveys are not inherently dependent on being undertaken outside of core working hours and may give rise to disturbance. It is recommended that this provision be removed or amended to require case-by-case approval with clear justification. **7.4(l)** – Public Health considers mechanical and electrical installation works within buildings once erected and enclosed are not inherently dependent on being undertaken outside of core working hours. Works within enclosed buildings may

No	Action Point	SCC Response
		reduce external impacts, however, such works can still generate noise, vibration and traffic movements. It is recommended that this provision be amended to limit activities to those that do not exceed background noise levels at the nearest sensitive receptors, are not expected to give rise to perceptible vibration outside the enclosure and set limits to additional traffic movements including deliveries and workforce travel. **7.4(m)** – No comments/objection **7.4(n)** – No comments/objection **7.8(a)** – No comments/objection **7.8(b)** – Public Health considers that internal fitting out works associated with the substation are not inherently dependent on being undertaken outside of core working hours. With effective planning, these activities should be capable of being undertaken within core hours. It is therefore recommended that this provision be removed or amended to require stricter controls relating to noise, vibration and traffic implications with supporting justification. **7.8(c)** – Public Health accepts that there is a need to safely conclude certain activities that cannot be abruptly halted. However, it is important that this provision is not relied upon as a matter of routine due to poor sequencing of works. Construction planning should ensure that activities which

No	Action Point	SCC Response
		cannot be safely paused are not commenced where there is insufficient time remaining within core working hours for their completion or safe cessation. It is therefore recommended that this provision be amended to clarify that it applies only where continuation is genuinely unavoidable, i.e. not as a result of works being commenced with foreknowledge that activity would require continual working that would extend beyond core hours. **7.8(d)** – Testing and commissioning of electrical plant is not inherently unsuitable for core working hours. It is recommended that this provision be amended to allow exceptions to core working hours only where safety implications exist. **7.8(e)** – No comments/objection
34.	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	SCC has provided wording for Requirement 7 in Appendix A of this document which has been submitted as a separate submission. SCC circulated proposed wording to the other Councils. However, alterations have since been made, which means the submission from other Councils may not be identical to SCC's.
35.	It is understood that SCC and the applicant are to meet on 7 April regarding access to healthcare and the implementation, monitoring and coordination of mitigation measures to minimise disruption to healthcare access. Provide an update following this meeting	Officers from ESC, SCC, and the Applicant met on 7 April 2026 to discuss health and wellbeing matters. This included implementation, monitoring and mitigation of healthcare access, the development of a health and wellbeing monitoring plan, and core working hours.

No	Action Point	SCC Response
		Whilst no agreements were reached, to progress discussions the Applicant committed to provide further clarity and rationale on the proposed working hours exemptions in Requirement 7 [REP5-005], and SCC will provide high-level recommendations on facilitating monitoring of both access to healthcare, and health and wellbeing. In respect of mitigation, Public Health suggest proactive measures are required alongside robust monitoring. A dedicated plan should be developed setting out how access to GP practices, hospitals, pharmacies, mental health services and other care settings will be maintained throughout construction. This should include: • Ongoing liaison with local NHS bodies, GP surgeries, and ambulance services to identify sensitive locations, groups and relevant time periods. • Coordination with ambulance service and install signed priority routes for ambulances and patient transport. • Temporary transport support (e.g. community shuttle, patient transport coordination) where access is disrupted, particularly in rural areas. • Engagement with key public transport providers to build contingency plans

No	Action Point	SCC Response
		• Monitoring of impacts on journey times to healthcare facilities during construction. • Triggers for intervention if access issues exceed agreed thresholds. • Coordination with other nearby NSIPs and major projects to minimise overlapping disruptions and compounded access issues.
Cultural Heritage		
39.	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	Suffolk OWSI SCCAS advise that although generally happy with the approach to ongoing archaeological evaluation and mitigation which is set out within the Suffolk OWSI, that a number of amendments are still required (further to those already made in response to SCC comments in the LIR) in order to achieve SCCAS agreement with this key document and to ensure that a robust and appropriate scheme of archaeological mitigation is secured and delivered. Aside from a few technical details requiring correction, clarity is needed within the document regarding the necessary timing of archaeological works in relation to other elements of the scheme (prior to any pre-commencement as well as construction works) and the safeguards which will be put in

No	Action Point	SCC Response
		place to ensure archaeological requirements are recognised by all parties who will be undertaking pre-commencement and construction works as part of the development. More robust provisions need to be set out for sites which are to be mitigated through Preservation in Situ and greater clarity is required regarding areas of the scheme where archaeological assessment work remains outstanding in line with the most up to date order limits and works plans. The mitigation areas presented within this document are also not yet agreed. The approach to post-excavation reporting also needs amending in line with the approach which has been tried and tested for other major infrastructure projects in the county. Detailed comments will be provided at Deadline 6 and have also been shared with the Applicant's archaeological consultant. <u>DCO Requirement 14</u> Whilst the wording of Requirement 14 is generally satisfactory, SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. There is a need to ensure that archaeological work is undertaken

No	Action Point	SCC Response
		before any other activity involving below ground disturbance occurs within an area, in order to avoid other works potentially occurring within sites of defined archaeological significance prior to the completion or implementation of agreed archaeological work, as this would undermine the ability to appropriately mitigate the impacts of the development upon below ground heritage assets. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. <u>Alternative wording recommended</u> As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: 'All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, ***prior to the commencement of any pre-commencement or construction works in that stage'***.
Cumulative Effects		

No	Action Point	SCC Response
44.	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	In response to 2CEIntra3, SCC proposed mitigation for Public Rights of Way and Public Health. In response to AP45 below, SCC has set out its reasonings for PRoW and Health and Wellbeing mitigation. For PRoW, SCC has taken the view, in lieu of additional onsite mitigation/offsetting being proposed by the Applicant, that offsite measures would be the appropriate approach to secure the required offsetting and that this could be secured via a s106 with SCC. For Health and Wellbeing, SCC provides requirement wording for a Mental Health and Wellbeing Monitoring Plan in Appendix A to this document which has been submitted separately. Such a plan is considered essential to ensure that potential impacts are appropriately identified, understood, and managed over the lifetime of the Project. In this context, Public Health considers that reliance solely on pre-defined embedded and management measures is insufficient to ensure that impacts are appropriately identified and mitigated. A more responsive approach is required, one that enables the ongoing identification of emerging issues and supports timely, proportionate intervention. Monitoring is therefore a fundamental component of mitigation, providing the evidence base necessary to inform adaptive management throughout the Project lifecycle. Accordingly, the Applicant should develop and implement a proportionate yet robust Mental Health and Wellbeing Monitoring

No	Action Point	SCC Response
		Plan for the duration of the Project (construction and early operation), supported by clear reporting routes, defined review points, and mechanisms for escalation where required. 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 underrepresenting wider community impacts, particularly among individuals who may experience stress, anxiety, or deterioration in wellbeing but do not engage with formal health services. Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views may be influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, when carefully designed and interpreted, survey and qualitative approaches can provide valuable triangulation alongside service based data. Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include: • Population health management (PHM) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services

No	Action Point	SCC Response
		• Engagement with Primary Care leads within the project catchment to identify emerging trends • 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: University publishes independent study on early impacts of Sizewell C | University of Suffolk • Following SCC's guidance on community engagement community-engagement-and-wellbeing-policy • The Applicant should also actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts. Furthermore, the Applicant should establish an

No	Action Point	SCC Response
		appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that access to healthcare impacts are addressed effectively and transparently. 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 indicators and thresholds, and explains how findings would trigger mitigation or adaptation of measures. 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.
45.	Comment on whether you believe that the Secretary of State can consider that all stages of the mitigation hierarchy have been fully met based upon the mitigation offered by the applicant at DL5.	Due to the volume of information requested for Deadline 6 and officer availability, SCC has been unable to answer this Action Point in full. SCC will supplement this answer, such as from a highways perspective, in its Deadline 7 submissions.

No	Action Point	SCC Response
		Public Rights of Way For all stages of the mitigation hierarchy to have been fully met, the full range of extent of effects must be considered. SCC does not consider that this has been fully achieved with regards to Public Rights of Way, particularly when considering both intra-project and inter-project cumulative effects. SCC has previously set this out, such as in [REP1-130] and [REP4-201]. The main issues with the Applicant's assessment are the lack of consideration of the Public Rights of Way users across the wider network and in the wider context of continued disruption from cumulative developments. The first issue can be viewed as one relating to intra-project cumulative effects. The Applicant's assessment [APP-059] considers non-PRoW effects arising on individual PRoW receptors. However, it does not consider the synergistic effect of the various disruptions on the wider PRoW network arising from the project across the construction period. PRoWs do not exist in silos; rather, each one forms part of a network which users travel along. Accordingly, PRoW users will interact with various parts of the network during journeys which varies depending on the nature of each journey. Whilst each individual closure and diversion may not be considered significant, it remains an open question as to whether the combination on these closures and diversions over the

No	Action Point	SCC Response
		construction period may be significant for PRoW users who utilise the wider PRoW network. SCC has detailed the adverse effects which are likely to arise when considering this such as the chilling effect of repeated disruption over a long period discouraging general PRoW use in addition to the experience of a combination of adverse effects across the construction period. The combined effects of disruption to multiple PRoWs over the construction period has not been considered in [APP-054] or [APP-059]. Related to this issue is the effect of the repeated disruption to the PRoW network in combination with the disruption from cumulative developments over a prolonged period of time. SCC has detailed these concerns in previous submissions such as in paragraph 11.207 of [REP1-130]. Again, the Applicant has assessed individual PRoWs cumulatively [APP-060] but has not considered the combination of these effects on individual PRoWs in relation to the wider context of each PRoW's role in the PRoW network which reflects the reality of the use of PRoWs. The aforementioned concern of repeated disruption to the PRoW network causing a chilling effect is likely to be greatly exacerbated when considering the added disruption and extended duration of impact from Sea Link combined with cumulative developments. The potential effects of recurring disruption from this project in conjunction with cumulative developments over a prolonged

No	Action Point	SCC Response
		period of time on the local PRoW network and associated PRoW users may be considered as secondary or indirect effects. However, this does not affect their relevance for the purposes of assessing the likely significant effects of the project and by consequence, the application of the mitigation hierarchy. This is reflected in Schedule 4, paragraph 5 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states "*The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.*" In lieu of evidence demonstrating otherwise, SCC considers that a precautionary approach should be taken to ensure there are no residual effects which are not offset. Another concern with inter-project cumulative effects is the assessment's [APP-060] recognition that there is potential for effects to be significant when considering PRoWs in isolation. This includes the cumulative effects of this project and Lion Link on receptors S-P14, S-P15 and S-P17 which are assessed to be Minor/Moderate, following which it is stated "*However, given that the effect of each individual development is minor, and the peak construction phases are unlikely to overlap, it is considered likely that the overall cumulative effect on receptors S-P14, S-P15 and S-P17 would be not significant.*" For the purposes of

No	Action Point	SCC Response
		closures and diversions, what matters is not peak construction phases but the duration of disruption. Even if there is a temporal gap between the disruption from the two projects, the total disruption is still increased by each one along with the second-order effects from recurring disruption to PRoW users. Therefore, SCC does not see how it can be considered that significant cumulative effects are unlikely for these receptors. This point also applies to the assessment of cumulative effects on receptors S-P9 and S-P10 in relation to EA1N and EA2. In addition, the Applicant states "*In terms of PRoW, to reduce the potential for significant overall cumulative effects, PRoW closures/ diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm (ID5) and East Anglia TWO Offshore Windfarm (ID6).*" SCC has previously criticised the Applicant's reliance on coordination to avoid potential significant effects such as in Table B3 of [REP2-062] and in response to the Applicant's answer to 1TT17 of ExQ1 [REP4-201]. Regarding the question of whether the Applicant has met the requirements of the mitigation hierarchy in relation to PRoWs, SCC understands that further detail of mitigation will be provided by the Applicant at deadline 6 by way of a revised outline PRoWMP taking into account SCC's proposed revisions submitted at Deadline 2 {REP2-062]. SCC also understands that this revision will include details securing the proposed

No	Action Point	SCC Response
		permissive routes from the B1121 access and within the converter station site. SCC awaits the submission of this information before it can determine whether the mitigation hierarchy has been applied in full. However, SCC can provide the following preliminary thoughts. It is unlikely that the revised plan will account for the additional potentially significant effects set out here (and previously) by SCC, particularly in terms of total effects on users of the local PRoW network. Whilst the proposed permissive routes are a necessary and welcomed measure, they do not serve to fully mitigate and offset the effects set out by SCC when considering the disruption to the wider PRoW network. The Applicant has indicated that additional offsetting measures proposed by SCC in terms of some kind of right of way along the B1119 is not feasible. Therefore, it is most likely that some commitment to offsite offsetting will be necessary to satisfy the mitigation hierarchy when taking a precautionary approach. This would consist of measures to improve the local PRoW network in lieu of measures being available within the Order Limits. This could be secured through some kind of legal agreement such as a s106 to be agreed with the local authorities. The measures secured in this agreement could be in the form of a financial contribution to SCC to provide offsetting through enhancement of the affected local PRoW network as this is something SCC has extensive

No	Action Point	SCC Response
		experience in undertaking as the relevant local authority for PRoWs. Due to the lack of consideration of the collective effects on the local PRoW network on PRoW users arising from this project and cumulative developments across a prolonged period, SCC considers that a precautionary approach should be taken to ensure there are no residual effects which are not offset. *Landscape and Visual* SCC welcomes the commitments made by the Applicant with regards to impact avoidance, through avoiding features of landscape and ecological value, with the result that no ancient or veteran trees will be lost because of the scheme. However, SCC considers that the Applicant has not fully met all stages of the mitigation hierarchy based on the mitigation at DL5, as significant and non-significant adverse effects remain as residual effects. SCC considers that, for these, proportionate compensation should be offered as part of the mitigation hierarchy. SCC does not share the Applicant's definition of compensation as remedying or undoing an effect (ISH3), as SCC would consider this mitigation. Compensation by its nature provides something beneficial to offset/make up for an impact or effect that cannot be remedied/ mitigated.

No	Action Point	SCC Response
		SCC considers that it would be difficult to achieve offsetting by means of landscape enhancement given the practicalities of the immediate landscape context. However, SCC does not see why policy around the application of the mitigation hierarchy would restrict offsetting SCC considers that the Applicant has failed to avoid impacts on the Fromus Valley by pursuing the access from the B1121 and not fully exploring and assessing other access options that were suggested by SCC. *Health and Wellbeing* Public Health does not consider that all stages of the mitigation hierarchy have been fully met in relation to health and wellbeing. Within [APP-058], the Applicant has relied primarily on embedded design measures and generic control and management measures, with no additional mitigation proposed specifically to address health and wellbeing impacts. Paragraph 11.8.1 states that "*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 paragraph 11.10.1 concludes that "*After considering embedded and control and management measures no likely significant adverse effects have been identified. Additional mitigation measures are therefore not required to further reduce, mitigate or offset likely significant adverse environmental effects on health and wellbeing*

No	Action Point	SCC Response
		receptors". This position is then carried through into the residual effects conclusions, with paragraph 11.11.2 stating that "*there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme*". Public Health has consistently challenged these conclusions. The assessment underestimates the nature, extent and persistence of health and wellbeing effects, particularly those arising from cumulative exposure to disturbance, including landscape and visual change, traffic and transport, diversions to Public Rights of Way, noise and vibration, restrictions in access to healthcare, diminished sense of place, belonging and control, uncertainty, and the concentration of multiple NSIPs in Suffolk. In particular, mental health is not meaningfully assessed as a distinct or substantive outcome. The assessment makes only a limited and largely implicit reference to mental health within the context of social cohesion and community identity at paragraph 11.9.53. This level of assessment is insufficient for such an important domain, especially given the scale, duration and cumulative context of the Project. Specifically, [APP-058] does not evaluate key mental health pathways that are reasonably foreseeable in the context of the Project. These include the mental health effects of prolonged uncertainty over a multiyear construction period, sustained

No	Action Point	SCC Response
		exposure to multiple, overlapping disturbances, loss of predictable respite and recovery opportunities, and the cumulative psychological burden experienced by communities hosting successive NSIPs. As a result, the assessment risks underrepresenting mental health impacts; these impacts may not translate into immediate service demand but nonetheless affect population wellbeing. The same criticism is true in the assessment of vulnerable groups. The Applicant's consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060] and [APP-058]. These deficiencies are not resolved by the mitigations currently proposed, nor addressed further at DL5. A key consideration across all phases is the potential for cumulative effects, both intra and inter. The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are "*minor adverse (not significant*)" and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment acknowledges that, for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there is potential for significant cumulative effects during construction, operation, and

No	Action Point	SCC Response
		decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific health and wellbeing mitigation is confirmed for these cumulative effects. Similarly, the inter-project cumulative effects assessment [APP-060] identifies potential impacts on health and wellbeing arising from landscape and visual effects, noise and vibration, traffic and transport, and social cohesion. Despite recognising that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity, the Applicant concludes that because individual effects from each project are generally assessed as "*minor adverse (not significant)"* and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is "*not significant*", with no health and wellbeing mitigations proposed. SCC considers in respect of cumulative impacts, the approach taken within [APP-058], [APP-059] and [APP-060] does not adequately reflect the lived experience of affected communities, nor the combined psychological and social consequences of prolonged disturbance, uncertainty and repeated exposure to development activity. The assessments consider individual environmental effects in isolation, rather than capturing how multiple "minor adverse (not significant)" effects may interact

No	Action Point	SCC Response
		spatially and temporally to produce materially harmful outcomes for mental health and wellbeing. This risks systematically underestimating the severity and persistence of cumulative health impacts, particularly in communities experiencing multiple NSIPs in succession or in close proximity. These limitations are compounded by the proposed construction programme that sets out lengthy core working hours. Sustained activity outside conventional weekday periods has the potential to materially reduce predictable opportunities for respite over a prolonged construction period. Even where technical thresholds for individual effects are not exceeded, continuous exposure to noise, vibration, visual change and access disruption can feasibly contribute to stress, sleep disturbance, anxiety and reduced quality of life, particularly when combined with wider uncertainty and loss of control. These effects are likely to be disproportionate for vulnerable groups, including older residents, disabled people and those without access to private transport, who may have fewer opportunities to avoid exposure or access alternative environments for respite. Whilst Public Health recognise the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working represents the least harmful option as part of the mitigation hierarchy. In the absence of such consideration, the potential for cumulative mental health and wellbeing effects arising from extended and overlapping

No	Action Point	SCC Response
		construction activity remains insufficiently mitigated. Public Health therefore considers that additional mitigation is required to address cumulative impacts on community mental health and wellbeing arising from the prolonged and combined interaction of construction activities. This should include restrictions to core construction hours as proposed by the Council in its rewording of Requirement 7. Any exceptions should be agreed in advance with the LPA, with startup and closedown periods limited to no more than one hour either side of core hours and excluding activities likely to cause disturbance to nearby residents or businesses. A further limitation is the absence of targeted mitigation for vulnerable groups. Whilst [APP-058] refers in general terms to considering vulnerable groups, Public Health raised in ISH3 post hearing submission that specific groups, including neurodiverse individuals, people with sensory sensitivities, older residents and those without access to private transport, are not meaningfully addressed either in the assessment or in mitigation design. Taking these matters together, Public Health maintain the view that monitoring of mental health and wellbeing is fundamental to mitigating impacts, as it enables the identification of emerging issues in real time and provides an evidence base to inform proportionate and responsive mitigation. Given the uncertainty associated with predicting mental health and wellbeing effects, especially those that may arise cumulatively and over extended timeframes, reliance solely on predefined embedded and

No	Action Point	SCC Response
		management measures is not considered sufficient. Instead, a framework for robust adaptive mitigation is required, capable of responding dynamically to issues identified through ongoing monitoring and engagement. A Mental Health and Wellbeing Monitoring Plan is therefore recommended for the duration of the Project (construction and early operation), with clear reporting routes and defined review points. The Applicant should also actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts. Furthermore, the Applicant should establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that emerging health and wellbeing impacts are addressed effectively and transparently. Another factor reinforcing the need for a comprehensive monitoring plan is the potential for adverse cumulative effects on vulnerable groups, as well as the likelihood of unforeseen changes within the planning and community context over the lifetime of the Project. For example, SCC is aware that a new

No	Action Point	SCC Response
		SEND school is due to open in close proximity to the B1121 and the Applicant's permanent access road. This receptor does not appear to have been considered within the Applicant's assessments, potentially reflecting the timing of the application relative to the evolving local baseline. This illustrates a key limitation of the assessment processes, be it assessments are unable to account for material changes that may arise post-submission, including the introduction of new sensitive receptors or changes in population vulnerability. Public Health considers that whilst effort has been made to avoid and reduce impacts through scheme design and standard control measures, insufficient attention has been given to the latter stages of the mitigation hierarchy, namely monitoring, adaptive management, and responsive intervention. As such, Public Health does not consider that the mitigation hierarchy has been fully or effectively applied in relation to health and wellbeing. *Socio-economics and Tourism* A similar line of reasoning as the one set out above for Health and Wellbeing applies to SCC's view on the application of the mitigation hierarchy for Socio-economics and Tourism. As detailed previously in the examination such as [REP1-130], SCC does not consider that the Applicant's assessment conclusions have been adequately justified and that there is potential for

No	Action Point	SCC Response
		significant effects to arise when considering the context of cumulative developments. Therefore, SCC has proposed mitigation in the form of requirements relating to Tourism Monitoring, Accommodation monitoring and a Skills, Supply Chain and Employment Plan which would serve to ensure that the mitigation hierarchy is followed in respect of Socio-economics and Tourism.
48.	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	It has not been possible to produce the joint position statement requested. However, SCC offers its position in response to this Action Point, which includes a Figure appended to this document displaying where further mitigation planting could be delivered. *Fromus crossing* The landscape mitigation proposals in the OLEMP [REP4-065] in relation to the Fromus bridge are welcome but cannot mitigate for the west-east crossing of a historic landscape with a north-south orientation. This access route remains detrimental to the historic landscape of the Fromus Valley. SCC therefore considers that compensation needs to be offered. The proposals to strengthen areas of existing planting to provide greater biodiversity and screening function around the River

No	Action Point	SCC Response
		Fromus Bridge and to establish native woodland planting within the areas previously planted with willow plantation to integrate and partially screen views of the River Fromus Bridge within the valley landscape are welcome in this context and SCC would welcome if the riparian landscape in this area was to be enhanced. The commitment to provide a permissive access (for the lifetime of the asset) along the proposed access route, would, while a rights of way issue, also be beneficial in landscape terms, as it would provide better access to the landscape and improved connectivity to the host communities in the area. *Converter Station Site* Given the landform of the landscape and openness of the site, as well as the nature and scale of the proposed project, SCC considers that a multi-layered approach to mitigation planting is required to achieve minimisation of visual effects from as many locations surrounding the site as possible (not just from the worst affected representative viewpoints). Through re-instatement of boundary hedgerows in the wider landscape and the use of strategically placed woodland blocks/tree groups, as well as scattered trees, in varying distances from the visual receptors, would make mitigative planting more effective in screening the development (viewing angle) and/or provide a different focus in the middle ground.

No	Action Point	SCC Response
		SCC considers that in the pursuit of minimising the land take for the scheme, the Applicant has not retained sufficient land to provide mitigation planting commensurate with the scale of the project and magnitude of change to views and landscape character east of Saxmundham. This has also been pointed out by the Design Review Panel. The current proposals are not expected to be able to fully screen the converter station, even long-term, given the height of the proposed buildings and the location of the proposed mitigation planting, close to the proposed structures. SCC considers that there is scope within the order limits for additional landscape planting. SCC has commented previously on the proposed tree belts around the converter station site in response to ExQ1 [REP3-101]. The cross-sections in relation to the proposed planting along the B1119 provided by the Applicant in their revised OLEMP [REP4-065] now show a planting corridor of 8.5m width with three rows of trees, presumably planted at 3m centres. While an improvement, this still falls short of the planting strip of at least 10m width, which SCC considers should be provided along the B1119 to provide a meaningful landscape feature (for example from views form the north as from VP16 [APP-211]. SCC is concerned that the relatively narrow width will result in unsympathetic maintenance and management to keep access routes both north and south of the tree belt accessible.

No	Action Point	SCC Response
		In addition to this the following further mitigation measures should be considered: *Predominantly within the DCO limits:* SCC maintains that there could be planting along the PRoW leading south from the B1119, which would not need to completely block views to the wider landscape, such as a line of trees or intermittent shrub planting. While such planting may not be able to fully screen the development in the distance, it would provide interest and variety in the foreground, while still allowing views into the wider landscape (in directions other than towards the converter station). Strategic block planting could be used to the north of the converter station (for example, to the north-east of where the three PROW meet in their proposed location). Such intermittent planting would improve screening/filtering of views from VP1 [APP-208] (and other parts of the PRoW). *Predominantly outside DCO limits:* Further hedgerow and tree planting should be considered along Public Bridleway Sternfield 491, route 10 (relating to VP4 and VP5, both [APP-209]), and the PRoW leading north-east from the B1119 (Sternfield 8) (relating to VP21 [APP-213]). South of the proposed Converter Station site (largely outside the DCO limits) further mitigation layers would be desirable.

No	Action Point	SCC Response
		These suggestions are indicated as a snippet based on Figure1 Saxmundham Converter Station Outline Landscape Mitigation within the oLEMP [REP4-065], submitted as Appendix B to this document at Deadline 6 and SCC asks that they are considered in a Landscape Masterplan (see SCC Design Engagement Strategy document, also provided at Deadline 6). In terms of Design, SCC has produced a Design Engagement Strategy document which is intended to be incorporated as an Appendix to the Design Principles – Suffolk document.
49.	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.	SCC had a meeting with the Applicant on 8th April. However, the Applicant stated that it did not consider it necessary to discuss further mitigation or offsetting measures as it considered that it had met the requirements of the mitigation hierarchy.
Noise and Vibration		

No	Action Point	SCC Response
59.	Respond to the applicant's comments on noise thresholds for the shoulder hours.	SCC will respond at Deadline 7 due to capacity constraints
Ecology and Biodiversity		
81.	Respond to the applicant's comments regarding hedgerow gaps.	SCC will respond at Deadline 7 due to capacity constraints

Appendix C


Additional mitigation for VP21
Additional mitigation for VP1
Additional mitigation for VP4
Additional mitigation for VP5
Legend
Order Limits
Saxmundham Converter Station Limits of Deviation
Permanent Access Route
Attenuation ponds
Existing Public Right of Way
Diverted Public Right of Way
Native Woodland Planting
Native Hedgerow
Native Hedgerow Trees
Species Rich Neutral Grassland
Riparian Planting
Existing vegetation to be strengthened with native woodland species
SCC Additional Mitigation Recommendation
0 50 150 300
nationalgrid
SEA LINK
Figure 1 Saxmundham Converter Station Outline Landscape Mitigation
Fairfield Road
Saint John's Road
Saxmundham
Saxmundham Library
South Entrance
St John the Baptist's Church
B1119
Workhouse Lane
B1119
Friarsmoor Lane
Kiln Lane
Church Hill
Main Road
School Lane
Sternfield
St Mary Magdalene Church
The Street
The Street

Appendix B to Suffolk County Council's response to ISH 3 Action Points: Design Engagement Strategy

Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a mechanism for independent design review to be incorporated into Requirement 3 of the draft DCO as requested by 3GEN8 of ExQ3. The document also sets out how engagement will be sought in relation to the designs of the converter station and Fromus bridge and includes narrative on how the documents for submission pursuant to Requirement 3 will be prepared and what they will consist of. This document is intended to be incorporated as an appendix to Design Principles – Suffolk application document. SCC used Appendix A of the design principles statement included in the EA1N and EA2 consents as a starting point and has edited it according to the nature of this project. SCC considers that a version of design principles 4, 5 and 6 from the SPR design principles statement should be included as design principles in this document as they relate to engagement. SCC will seek to provide appropriate wording for this at the next deadline. SCC has shared this with ESC and will seek to engage further with ESC and the Applicant. SCC considers that a similar document could be incorporated into the Design Principles – Kent application document.

Introduction

1. This document sets out how consultation will be undertaken as the design of the onshore Converter Station prior to the discharge of the relevant Development Consent Order (DCO) Requirements.

2. It explains how the design of the onshore infrastructure in Suffolk pursuant to Requirement 3 will be implemented as the Project progresses in accordance with the Key Design Principles and highlights the key elements of these principles for ease of reference.

3. The design of the Converter station and their environs will be co-ordinated through the development of a **Landscape Masterplan** which will include the land which is required for landscaping and drainage features including SuDS ponds. The Landscape Masterplan will be developed in line with the Key Design Principles and will continue to be developed through the design period. There will also be an **Architectural Framework** document which will consider the various options for the finishes and styles of certain elements of the converter station development and demonstrate compliance with the Key Design Principles. The location of the Converter Station and the parameters which are set out in the DCO will not be the subject of consultation. Further information on these documents is presented below.

4. For the Bridge over the River Fromus, an Architectural Framework will be developed to fulfil the Requirement 3 along with a technical statement demonstrating how, recognising the minimum size parameters, the Applicant has

sought to reduce the scale of the bridge and achieve good design in accordance with national policy, having regard to the relationship with the landscape mitigation proposals, the articulation of the spanning structure, the design of the abutment walls, external colour, surface finish, materials, separation of pedestrian and vehicular traffic and the design of the parapet railings. The technical statement will include a plan, elevation and section drawings, and 3D renders of the bridge design in key view VP02 and CH02.

5. This document describes the approach to the Landscape Masterplan and Architectural Framework documents and explains how engagement will take place in the development of these documents.

DCO Requirements

6. There are a number of Requirements in the draft DCO (AS-109) which necessitate the relevant planning authority (East Suffolk Council (ESC)) to discharge Requirements which will confirm the final details of a number of matters including the design of each substation, the associated landscape and the surface water management. These Requirements will be discharged using a suite of documents known as Requirement Discharge Documents (RDDs).

7. The RDD in respect of Requirement 3, relating to the final details of the converter station, substation and River Fromus Bridge, will be developed separately.

8. In advance of the preparation of the RDDs relating to the converter station and River Fromus Bridge, an Architectural Framework will be prepared for each, and a Landscape Masterplan for the converter station site will be further developed in consultation with local stakeholders.

9. The Applicant will engage with ESC and SCC during the DCO recommendation/determination phase of the Application in order to progress the Landscape Masterplan and Architectural Framework. Once consents for the Project have been granted, the Applicant will formally engage with local stakeholders on the Landscape Masterplan and Architectural Framework.

Landscape Masterplan

10. The primary aim of the Landscape Masterplan is to develop a landscape framework around the proposed converter stations that provides sufficient screening to mitigate as far as practicable, the visual impact of these developments and integrate them sensitively within the landscape.

11. It will develop the principles and detail set out in the outline Landscape and Ecological Management Plan (OLEMP) and will be discussed with stakeholders at workshop meetings. The landscaping solutions within the final Landscape Masterplan will be set out in the final Landscape and Ecological Management Plan for approval

by ESC.

12. In line with the ***OLEMP***, the landscape design approach selected for the converter stations combines the approaches of concealing and integrating the converter stations into the landscape to meet the mitigation requirements and also as a response to the local landscape character and the historic landscape context.

13. The further development of the Landscape Masterplan will reflect the design of the converter stations; and the opportunity for both bunding and refinement of woodland planting to address the main aim of providing visual screening of the converter stations. It will also detail where new hedgerows may be planted to supplement the woodland framework around the converter station complex.

14. The final Landscape Masterplan will identify areas, providing enhanced habitat benefits in their own right, while also providing further visual contrast with the 'technological' appearance of the grid connection developments. Arable farming fields that are retained for agricultural use will contribute to retaining the rural character in the area around the developments.

15. It will also present details of any early establishment of tree and hedgerow planting, in order to deliver mitigation as early as possible for the Projects, to the extent that the relevant order limits allow.

16. Included in the final Landscape Masterplan will be a version of the Masterplan which incorporates the Lion Link Proposals for the Converter Station site. The Applicant will use its best endeavours to produce this plan on a collaborative basis with the promoter for Lion Link to ensure the details are as accurate possible and all reasonable measures are taken to coordinate and integrate proposals for the site to maximise the effectiveness of mitigation measures undertaken by the two projects in relation to the site of the Converter Stations. If the promoter for Lion Link is unable to participate in this collaborative exercise, or collaboration is otherwise demonstrably unfeasible, then the Applicant will produce a Masterplan incorporating the proposals of Lion Link using the most recent information available to demonstrate how it has sought to integrate and coordinate the Sea Link proposals with those of Lion Link.

Architectural Framework

Converter Station

17. There are a number of important and fundamental technical constraints which are inherent to the design of the converter station, particularly in respect to the location, form and appearance of the external electrical equipment and the functionality of buildings, known as Critical Design Constraints (CDCs). The design principles will also be adopted by the Applicant throughout the converter station's procurement and detailed design stage to reduce their environmental impact where efficient, cost effective and safe to do so. The layout of the converter stations will be determined by their functional demands; safety requirements; various practical

restrictions and considerations which will result in a safe and efficient electrical layout; and the converter stations design principles. The design criteria for the converter station layout are relatively rigid, in order to comply with safety, maintainability, and quality of supply obligations. However, within these constraints, other elements will be used to ensure the converter stations respond as well as possible to a sense of place and to minimise their visual impact. These elements will be set out in the Architectural Framework document which will be accompanied by a commentary on matters considered to reduce the environmental impact of the converter stations.

18. The Architectural Framework will be prepared to provide further information to guide and inform the detailed design for the individual converter stations. The design approach outlined therein will provide principles in terms of the form, colour and materials of the following key architectural components:

- Buildings;
- Fencing; and
- Hard landscaping.

19. The Architectural Framework will be prepared with advice from specialists including, landscape architects and design engineers in order to develop an architectural vocabulary that can be applied to the converter stations throughout all phases of the Projects. It will provide design proposals for appropriate solutions for external architectural treatment.

20. The Architectural Framework will consider the existing landscape context and will develop an external treatment to the converter station complex that will respond successfully to the surrounding environment and context. The document will also respond, as far as is practical, to feedback received during community engagement. The Architectural Framework will ensure that the treatment proposed for the converter stations is sensitive to place, with visual impacts minimised as far as practical by the use of appropriate design, building materials, shape, layout, coloration and finishes, whilst considering the functional constraints of the converter stations themselves.

21. The final Architectural Framework will include:

- An overview of the approach taken, based on the established design parameters, principles set out in existing documentation and the advice and comments provided by ESC, SCC, the local community and the Design Council;
- Consideration of the form of the converter station complex;
- Colour analysis and review of potential façade colours for the external treatment of the converter station buildings;

- Review of material options for the primary forms of buildings and fencing; and
- Conclusions relating to the proposed solution for the external appearance of the converter station complex in terms of form, colour and materials.

22. The Architectural Framework will include an appendix consisting of a technical statement which will document how the Applicant has sought to satisfy each Key Design Principle for the Converter Station Site with reference to the Potential Associated Activities associated with each principle. The technical statement will also detail how relevant feedback from local authorities and relevant stakeholders has been considered for each design principle where relevant feedback has been received.
23. Where there is deviation from a Key Design Principle or an associated activity, the rationale for this change will be clearly set out in this technical statement and will demonstrate to the satisfaction of the relevant planning authority that the change has not adversely affected design and landscape outcomes in a material way.
24. Once complete the Architectural Framework will form the base from which the details of the layout, scale and external appearance of each converter station will be developed. to satisfy DCO Requirement 3.

Bridge over the River Fromus

25. The Architectural Framework for the Bridge will be of a similar nature to that made for the Converter Station, recognising the paramaters of Requirement 3 which must be followed. There are a number of important and fundamental technical constraints which are inherent to the design of the bridge, particularly in respect to the location, parameters in Requirement 3 and the functionality of the bridge which must be fit for the transportation of the project's Abnormal Indivisible Loads (AILs). The Principles of minimising the layout of the bridge and achieving best design as far as possible will also be adopted by the Applicant throughout the bridge's procurement and detailed design stage to reduce its environmental impact where efficient, cost effective and safe to do so. The layout of the bridge will be primarily based on its functional demands; safety requirements; various practical restrictions and considerations which will result in a safe and efficient bridge layout. However, within these constraints, other elements will be used to ensure the bridge responds as well as possible to a sense of place and to minimise its visual impact. These elements will be set out in the Architectural Framework document which will be accompanied by a commentary on matters considered to reduce the environmental impact of the converter stations.

26. The Architectural Framework for the bridge will be prepared to provide further information to guide and inform the detailed design for the individual converter stations. The design approach outlined therein will provide principles in terms of

the form, colour, surface finish, materials, integration with landscaping proposals and all other aspects relevant to the bridge's external appearance.

27. The Architectural Framework will be prepared with advice from specialists including, landscape architects and design engineers in order to develop an architectural vocabulary that can be applied to the converter stations throughout all phases of the Projects. It will provide design proposals for appropriate solutions for external architectural treatment.

28. The Architectural Framework will consider the existing landscape context and will develop an external treatment to the bridge that will respond successfully to the surrounding environment and context. The document will also respond, as far as is practical, to feedback received during community engagement. The Architectural Framework will ensure that the treatment proposed for the converter stations is sensitive to place, with visual impacts minimised as far as practical by the use of appropriate design, building materials, shape, layout, coloration and finishes, whilst considering the functional constraints of the converter stations themselves.

29. The final Architectural Framework will include:

- An overview of the approach taken, based on the established design parameters, principles set out in existing documentation and the advice and comments provided by ESC, SCC, the local community and the Design Council;
- Consideration of the form of the converter station complex;
- Colour analysis and review of potential façade colours for the external treatment of the converter station buildings;
- Review of material options for the primary forms of buildings and fencing; and
- Conclusions relating to the proposed solution for the external appearance of the converter station complex in terms of form, colour, surface finish, materials, integration with landscaping proposals and all other aspects relevant to the bridge's external appearance.

30. Once complete the Architectural Framework will form the base from which the details of the layout, scale and external appearance of each converter station will be developed. to satisfy DCO Requirement 3.

31.

Engagement: stage 1

32. In order to generate the above-mentioned Landscape Masterplan and Architectural Framework for the converter station, the following engagement will be undertaken which will include an independent design review and engagement with the local community and local authorities as set out in this section.

33. The following procedure also applies to the documents prepared for the discharge of Requirement 3 for the River Fromus Bridge. However, due to the need for the bridge to be operational early in the construction programme to provide access to the converter station site, it may not be feasible to fully replicate the process set out below for the converter station. . Nevertheless, the Applicant will seek to achieve the same outcomes from engagement as far as possible. To be clear, the Applicant must engage in independent design review as set out below for the bridge and seek engagement from local stakeholders and local authorities during which the Applicant will supply sufficiently developed draft design documents ultimately pursuant to Requirement 3 to allow meaningful feedback to be given by local stakeholders and local authorities. This engagement will be sought both before and after independent design review. The material supplied for the purposes of engagement following independent design review will set out how feedback has been considered and how it has influenced the development of the supplied materials in terms of the bridge's design.

34. In other words, the Applicant will not bypass meaningful and effective engagement with local stakeholders and local authorities, nor will the Applicant vary the independent design review process for the River Fromus bridge. Instead, the Applicant may seek to streamline the process by which it undertakes engagement with local authorities and local stakeholders, such as by implementing alternative arrangements to the workshops which will be organised for the purposes of engagement on the converter station's design. Should the Applicant wish to pursue this variation in engagement strategy for the Fromus bridge design, it will engage with the local planning authority and seek its confirmation that the proposed alternative approach to engagement will not prejudice the ability of local stakeholders and local authorities to provide feedback on the materials supplied by the Applicant to influence the final design of the bridge.

Independent Design Review

35. The draft Landscape Masterplan and Architectural Framework will be submitted for an independent and objective review by a nationally recognised impartial body (such as the Design Council, in consultation with ESC and SCC) to inform and guide the final design solutions. It is recognised that for technical and operational reasons, the outcome of the design review process must produce a response that is practicable and capable of implementation in line with the regulatory and safety requirements of the converter station.

Parish Council and Local Resident Engagement

36. Parish Council and local resident engagement will be undertaken during the development of the Landscape Masterplan and the Architectural Framework *prior to submission to the impartial body*. This engagement will be in respect of the matters which are set out above, describing the Landscape Masterplan and

Architectural Framework. Whilst the height of building and external equipment will not be subject of consultation as the maximum heights will be set out in the DCO, the Applicant will outline the rationale for the heights of key buildings and external equipment heights.

37. The purpose of this engagement will be to obtain stakeholders' views on the options that are being considered in respect of matters such as planting, hard landscaping, colours and finishes.

38. A one-day workshop, chaired by an external and suitable experienced chairperson, will be held once the draft Landscape Masterplan and draft Architectural Framework have been developed to a point where it is appropriate to present to stakeholders the various options that require their consideration and input. This will be at a venue close to the Converter Station complex.

    There will be a session at the start of the workshop to provide an introduction and explanation of what is to be discussed. Those attending will then be split into a number of workshop groups. Each group will include stakeholders, developer representatives, and technical specialists. A suitably experienced chair/facilitator will make notes and ensure that the discussions run to time. The groups will be facilitated and will spend time discussing a number of pre-defined topics. Each group is envisaged to comprise of no more than 10 people (including representatives of the Applicant) to ensure constructive discussion and debate.

39. During the workshop it is anticipated that there may be an animated model of the converter station complex so that discussion can be undertaken looking at the model and considering different approaches. Photomontages will be used where appropriate and sample materials will be made available. A briefing pack will be sent to all attendees in advance of the workshop.

40. In parallel with the workshops, engagement with the Design Council and local authorities will be progressed to obtain their views on the matters which are being considered, and a site visit will be undertaken.

41. Following the workshop, there will be a one-week period for attendees to provide further thoughts and feedback to the Applicant. Material such as photomontages and material samples will be provided to the Parish Councils in the briefing pack in order to assist in facilitating this.

42. It is anticipated that the workshops will be attended by representatives of ESC (as the relevant planning authority), SCC, Benhall and Sternfeld Parish Council and Saxmundham Town Council (representing the wider community) and residents in the immediate vicinity of the converter stations. The final number of attendees from the local community (Parish Councils and local residents) will be in the region of 20.

Engagement: Stage 2

43. Feedback from the workshop and the Design Council will then be fed into the Landscape Masterplan and Architectural Framework as appropriate. Once a finalised draft is available, the documents will be circulated to the attendees of the workshop and residents in the immediate vicinity of the onshore converter station, and a further one-day workshop will be arranged to present the detail and explain the rationale behind the final decisions and provide an opportunity for final comment.

44. The documents will then be finalised, and details of proposed layout, scale and external appearance of the converter stations will be submitted to ESC for their approval.