

# SEA LINK

EN020026

## Comments on Submissions received by Deadline 5

Suffolk County Council



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## Glossary of Acronyms

<i>AILs</i>	<i>Abnormal Indivisible Loads</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>Examining Authority</i>
<i>ISH3</i>	<i>Issue Specific Hearing 3</i>
<i>LLFA</i>	<i>Local Lead Flood Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PHM</i>	<i>Population Health Management</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>RSCF</i>	<i>Regional Skills Coordination Function</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>
<i>SZC</i>	<i>Sizewell C</i>

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

## Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written response to submissions received by the Examining Authority (ExA) at Deadline 5.

Examination library references are used throughout this document to assist readers. SCC has not sought to repeat previous representations and has instead taken an approach of providing further information where appropriate.

Unless indicated otherwise, SCC considers its positions as set out in previous submissions unchanged.

## Comments on further information/submissions received by Deadline 5

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 1 – Document 3.1(H) draft Development Consent Order [REPx-xx]</b>			
1	Work No. 17 – Principal Public Right of Way Diversions	2), d) works to alter the course of, or otherwise interfere with a watercourse, drainage works, attenuation ponds, and temporary culverts;	This is to be omitted from the draft DCO.
2	<b>Schedule 3 Requirement 14</b>	Update to archaeology requirement 14	<p>SCCAS are generally satisfied with the wording Requirement 14 (Archaeology).</p> <p>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. 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.</p> <p>As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: ‘All</p>

Ref. No	Topic	Summary of submission	SCC Response
			archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, <b><i>prior to the commencement of any pre-commencement or construction works in that stage</i></b> .

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 2 – Document 7.5.3 (C) Outline Onshore Construction Environmental Management Plan [REPx-xxx]</b>			
1.	Drainage	Drainage Management Plan (DMP)	<p>The LLFA would like the applicant to agree a minimum level of detail for the DMP that will be provided.</p> <p>The DMP needs to include as a minimum:</p> <ul style="list-style-type: none"> <li>construction surface water drainage system design</li> <li>construction management, maintenance and remediation schedules</li> <li>required consents, e.g. Land Drainage Act, Environmental Permit</li> <li>flood risk controls</li> </ul>

Ref. No	Topic	Summary of submission	SCC Response
			<p>Flood &amp; weather alerts</p> <p>pollution, water quality and emergency control measures</p> <p>phasing plan (if required)</p> <p>construction site plan that includes compounds, material storage areas and temporary site parking</p> <p>The DMP should look to use a SuDs solution, and all SuDs are to be established prior to use.</p>
2.	Cultural Heritage	Cultural heritage provisions	<p>8.1 There WILL be direct and indirect impacts upon buried archaeological remains as a result of numerous elements of the planned pre-commencement and construction works. SCCAS would advise that greater clarity and detail regarding the pre-commencement and construction activities which have the potential to impact upon buried archaeological remains is needed within this document.</p> <p>The CEMP should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>be assessed and the location of any archaeological preservation in situ areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS are suitably protected.</p> <p>The CEMP should also set out the provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas.</p> <p>It is also worth flagging that any decompaction works following the removal of track matting (as set out in H01) has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies.</p> <p>Any reinstatement works (as set out in H02) will also need to take any identified archaeological PIS areas into</p>

Ref. No	Topic	Summary of submission	SCC Response
			account and ensure impacts are avoided within these areas.
3.	Roles and Responsibilities	Archaeological Clerk of Works	Table 3.1 of the CEMP should also include the Archaeological Clerk of Works (ACoW) and list their role and responsibilities.

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 3 – Document 7.5.6.1 (D) Outline Onshore Overarching Written Scheme of Investigation (OWSI) [REP5-070]</b>			
1)		Document approval status	This document is NOT yet agreed with SCCAS. Whilst many of the comments set out within the SCC LIR with regards to the first draft of this document have now been addressed, a number of amendments are still required in line with the comments set out below to facilitate this and to ensure that archaeological mitigation provisions are suitable and robust.
2)		Guidance documents	2026 versions of all SCCAS standard fieldwork guidance documents are to be issued in April 2026, so please can all references be updated to the latest versions.
3)		Timing of archaeological works and safeguards	<p>This document should explicitly set out that archaeological evaluation and mitigation work will need to be completed prior to the start of any pre-commencement or construction works within an area.</p> <p>It should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the site specific WSIs and</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of works and that defined archaeological PIS are suitably protected.</p>
4)		Mitigation areas/scope	<p>1.3.4 SCCAS have provided detailed comments regarding mitigation areas and the scope of the ongoing evaluation and mitigation work which is required for the project to the Applicant’s archaeological consultant. As such, Appendix A is not currently approved as not all mitigation areas are yet agreed and as an up to date and clearer plan showing the evaluation status for different areas of the scheme is needed.</p> <p>However, SCCAS would advise that as the final scope of evaluation and mitigation work will be agreed within the site specific WSIs, that plans showing provisional mitigation areas should be omitted from the OWSI as it is a working document and likely to change.</p> <p>SCCAS would advise that what is required in the OWSI is an up to date plan showing the status of evaluation works for the entire onshore area of scheme in Suffolk and clearly identifying which land parcels have had evaluation works</p>

Ref. No	Topic	Summary of submission	SCC Response
			completed and those where evaluation/assessment is still pending, based upon the latest order limits and works plans.
5)		Geophysical survey guidance	3.3.3 The SCCAS 2026 Standard Requirements for Geophysical Survey document should also be referenced here.
6)		Trenching levels	3.4.2 The expectation would be for a 5% trenching sample of any parts of the scheme where geophysical survey has been unable to be undertaken.
7)		Preservation in situ	4.2.19 In line with the updated requirement wording, provision needs to be made for a scheme wide HEMP which identifies the archaeological sites within the order limits which are to be preserved in situ rather than subject to alternative mitigation and sets out the safeguards which will be implemented to secure this during pre-commencement and construction works and also throughout operation.
8)		Preservation in situ	4.2.20 This will only be acceptable if it is demonstrated that there will be a sufficient buffer between formation levels and any archaeological remains, otherwise alternative mitigation will be required.  Any decompaction works following the removal off temporary haul roads or compounds has the potential to impact upon archaeological remains and therefore will

Ref. No	Topic	Summary of submission	SCC Response
			need consideration as part of any decompaction methodologies.
9)		Human remains	4.3.18 The statement relating to burial deposits should also include reference to the need for the SCCAS 2023 MPO guidance to be followed where a potential for this is identified.
10)		Scientific dating	4.3.43 and OSL dating
11)		Reporting	<p>Section 6 needs updating to reflect the required reporting strategy for the project and to offer greater clarity regarding the reporting process.</p> <p>Reports will be required for any further phases of archaeological assessment work which are undertaken.</p> <p>All mitigation sites will require a PXA to be prepared, whether they warrant publication or not. Provision needs to be made for a PXA for each mitigation site (or group of mitigation areas should they be located in the same area/contain related remains). Following the submission and approval of all PXAs, a project wide UPD will need to be prepared which sets out the ongoing strategy for assessment, reporting and publication for the project as a whole.</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>Provision should be made for full grey literature research archive reports for ALL sites, independent of publication given not every element of sites will necessarily be published.</p> <p>The approach to publication will be agreed in the UPD. It is likely that multiple publications will be necessary depending upon the agreed strategy e.g. thematic/period based/specific sites or finds of significance etc.</p> <p>All reports will need review and approval by SCCAS.</p>
12)		Site specific WSIs	<p>SCCAS preference, based upon what has worked successfully on other similar projects, is that following approval of the Outline Onshore Overarching WSI, a project wide site specific WSI which sets out the detailed strategy for further evaluation and mitigation for the entire onshore scheme in Suffolk should be submitted, to be supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation.</p> <p>These documents will need approval by SCCAS. This is so that the ongoing archaeological requirements for the project as a whole can be clearly understood, instead of a more piecemeal approach. This document can then also be provided to all project contractors, with the defined scheme</p>

Ref. No	Topic	Summary of submission	SCC Response
			wide locations of outstanding archaeological evaluation and mitigation added to project constraint mapping. This will ensure that all parties are clear as to the archaeological constraints in each part of the scheme and so that all archaeological mitigation work is completed prior to commencement of any other works in each area and that defined archaeological PIS are suitably protected.

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 4 – Document 7.5.6.1 (D) Outline Air Quality Management Plan – Suffolk [REP5-074]</b>			
Document 7.5.6.1	Outline Air Quality Management Plan	Updates to the document as per tracked changes	Public Health are content with the monitoring and mitigation proposed. Minor queries relating to specific sections are highlighted below.
Page 3 1.2.3	ESC	<i>'The element of the Proposed Project covered by this oAQMP is the Suffolk Onshore Scheme, which lies within the administrative area of ESC, which is a unitary authority within SCC.'</i>	East Suffolk Council isn't a Unitary Authority.
Page 12 AQ04	Speed limit		Why have the speed limits been taken out, it leaves it open to interpretation?

Ref. No	Topic	Summary of submission	SCC Response
Page 14 5.3.1	AQO4	<i>'Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated to minimise dust and particulate matter emissions and to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes'.</i>	Please can the frequency of these meetings be specified.

#### SCC Response

#### **Table 5 – Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]**

The Council considers much of the detail been provided in this response is additional to what had previously been submitted. As such, it does not agree that its previous submission that inadequate detail and consideration of its proposed alternative access route was incorrect.

SCC notes the reference to paras 4.3.22 and 4.3.23 of EN-1. SCC does not consider that the Applicant's response demonstrates that the proposed alternative route could not meet the objectives of the proposed development in the same timescale for the following reasons:

- The alternative route does not affect any part of the energy infrastructure included within the authorised development, meaning the same infrastructure capacity would be delivered.
- Accurate, up-to-date information regarding indicative timescales for the project's delivery have not been provided. The timescales provided, such as in [REP1A-004] do not account for the delay in the examination taking place. Although not mentioned in its need case

**SCC Response**

[APP-320], the Applicant has indicated elsewhere that the objective of the project is for energisation to occur by 2030. However, no information has been provided demonstrating the feasibility of this objective.

- Information on expected timescales for AIL deliveries are not provided. It may be the case that AIL deliveries which must use this route are not needed until later in the delivery programme which would provide time to construct the haul road, undertake any enabling works, such as at the level crossing, and, potentially, for the Sizewell Link Road to be constructed prior to AIL deliveries.

SCC notes the potential disadvantages of its proposed alternative access route which were recognised in SCC's original submission. However, SCC does not consider that these potential disadvantages outweigh the benefits of its route when compared to the Applicant's as set out in its original submission. To add, the risk from Sizewell C's works to the level crossing do not pose the level of risk portrayed by the Applicant. The works themselves are not expected to be lengthy and are planned to be completed by Q4 2026. If the works had not started by the time Sea Link needs to do its works, it should be possible for Sea Link to commence those works which would likely remove the need for Sizewell to do any works themselves as Sea Link would improve the crossing such that it can accommodate SMO AILs which is beyond Sizewell's needs at that crossing. The Applicant could coordinate to ensure the safety upgrades are such that Sizewell would not need to undertake any additional works which could cause delay to Sea Link.

SCC notes that the Applicant presents great detail on the potential disadvantages of SCC's route but does not undertake a balancing exercise between the positives and negatives of each route to demonstrate that the Applicant's route is preferable and justified in policy terms. SCC maintains that the potential issues posed by its proposed route have practical, deliverable solutions which is not the case for the Applicant's route given the uncertainties over the Benhall Bridge and the unsuitability of alternative options presented for AIL deliveries. Moreover, the potential for the mini-bridge option for the Benhall Bridge hardly represents a resilient long-term solution to access a new major energy hub when considering the likely future projects that will need access to connect to Sea Link's infrastructure, including Lion Link and other projects on the TEC register.

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 6 – Document 9.124 Landscape and Nighttime Assessment [REP5-137]</b>			
1)	Overall	The document sets out the required operational external lighting systems at Saxmundham Converter Station and Minster Converter Station and Substation, along with the relevant secured mitigation measures.	<p>SCC notes the additional information provided by the Applicant.</p> <p>However, SCC disagrees with the nighttime receptor value judgements and considers them fundamentally flawed. It is not evident, for example, how relative tranquillity and remoteness would be reduced at nighttime (see LCAL1).</p> <p>The document refers to Nano Watts of light in various areas of the scheme based on the CPRE mapping (paragraph 1.5.3). However, it does not interpret these values but focuses instead on the influence of the ‘brighter pockets’ on the darker areas.</p> <p>The CPRE England’s Light Pollution and Dark Skies Map shows that large parts of the project area between Saxmundham and and the Landfall site are within dark areas (below 0.5 Nano Watts/sqcm/sr), some of which</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>would be considered 'pristine' (below 0.25 Nano Watts/sqcm/sr).</p> <p>It would have been useful to see the DCO boundary superimposed on the CPRE map.</p> <p>The nighttime baseline photography underlines how dark the project area is. No visualisations of the operational phase were provided.</p> <p>SCC considers that this document underlines the need for a requirement within the DCO for a full external lighting design scheme to be submitted to and approved by the relevant discharging authority at detailed design stage (post DCO consent). This would need to be based on a design principle to minimise light pollution, by keeping lux levels and Kelvin values as low as possible and avoiding sky glow, glare and light intrusion through use of appropriate luminaires, mounting heights, hoods and louvres.</p>

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 7 – Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083]</b>			
1)	Basin sides slopes	6.6.5 Basin side slopes are proposed to be 1:3.	LLFA requirement for basins is no greater than 1:4 (LLFA SuDS Guidance Appendix A) If applicant wishes to use 1:3 side slopes, then a Designers risk assessment is to be supplied for each basin.
2)	Terminology	Use of the word ‘pond’.	Review document and replace pond with basins, unless there is to be a permanent body of water.
3)	Basin landscaping	9. Amenity, landscaping of the basins/swales is not referenced.	LLLFA require basins & swales to be Fescues or Bent grasses (80% plus) and Wildflower Seed (20% or less) – Wet or dry. Basins are to be vegetated prior to being used for water storage & treatment. (Suffolk SuDs Palette (SSP) - Guidance).
4)	Outfalls and Headwalls	Outfalls and headwalls are depicted as concrete with galvanised steel handrails	LLFA would request that the projects look at alternatives structures that will blend into the landscape of the basin, whilst being maintainable.
5)	6.2 Design Guidance and Policy	List the design guidance and policy that has been reviewed.	National Standard for SuDS shall be reviewed, and it shall be demonstrated through the document where the guidance cannot be met.

Ref. No	Topic	Summary of submission	SCC Response
6)	Appendix A: Drainage Design Summary	Proposed infiltration basin location.	Where infiltration basin is proposed, applicant need to demonstrate that infiltration is possible. If the infiltration rate is less than 10mm/hr, then an alternative strategy is to be demonstrated.
7)	Appendix B Drainage Layouts	Cross sections of basins	LLFA notes that there is cross section of attenuation/detention basins, but no infiltration basin is shown.
8)	Water Reuse	Alluded to water reuse by 3 <sup>rd</sup> party	Applicant needs to clearly demonstrate if water reuse by 3 <sup>rd</sup> parties is achievable and what level of water reuse can be achieved in accordance with the National Standards for SuDS.
9)	Cultural Heritage	Archaeological assessment and mitigation	All ponds, pipelines and associated drainage works should be scoped in for archaeological assessment (where located outside of areas within which evaluation has already been completed) and mitigation (as appropriate). Appropriate provisions for this must be set out within the OSWI and all relevant documentation.

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 8 – Document 9.27 Updated Archaeological Assessment – Suffolk [REP5-087]</b>			
1)	Response to document	SCCAS comments on additional archaeological assessment	<p>SCCAS would generally agree with the conclusions made within this assessment regarding the archaeological remains identified within the additional areas of archaeological evaluation. Whilst a number of remains of archaeological significance have been defined, SCCAS are satisfied that scheme impacts upon these heritage assets can be appropriately mitigated through an agreed programme of archaeological mitigation or through Preservation in Situ, to be secured through the OWSI and DCO Requirements (final versions of both still pending agreement).</p> <p>As previously set out by SCCAS, the D-shaped enclosure which has been defined at Friston is considered to be of regional significance and has the potential to contain settlement evidence and other remains. SCCAS would therefore advise that partial excavation of just a section of this feature would not be appropriate or in line with best practice and would not adequately mitigate the effects of the development upon this monument, resulting in a significant adverse effect. Therefore, this monument needs to be subject to a programme of enhanced mitigation to</p>

Ref. No	Topic	Summary of submission	SCC Response
			<p>enable it to be mitigated in full if not going to be completely avoided by the route</p> <p>On the basis of the changes proposed to the order limits in this area and the results of the latest archaeological evaluation work, there is a suitable alternative route which would avoid the enclosure entirely and provide an opportunity to preserve this monument in situ, which SCCAS would strongly support as the preferred and optimum mitigation approach.</p>

Ref. No	Topic	Summary of submission	SCC Response
<b>Table 9 – Document 9.84 (C) Register of Environmental Actions and Commitments (REAC) [REP5-115]</b>			
1)	Cultural Heritage	Heritage mitigation commitments	<p>Any decompaction works following the removal of track matting (as set out in H01) has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies. Any reinstatement works (as set out in H02) will also need to take any identified archaeological PIS areas into account and ensure impacts are avoided within these areas.</p>

Ref. No	Topic	Summary of submission	SCC Response
REAC B27	Seasonal restrictions on compound set up	<p>A seasonal restriction on compound set-up and demobilisation for the trenchless bore such that it occurs outside the nesting season (February to August). The most potentially disturbing elements of trenchless installation (set up of trenchless compound S10) will take place between September and January, to minimise disturbance of breeding nightjar and woodlark in the adjacent Sandlings SPA</p>	Should this seasonal restriction be between September and November for the Suffolk landfall compound to negate the risk of possible disturbance of overwintering birds at the RSPB North Warren reserve?
REAC B48	Cetti's Warbler nests	<p>A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. A specific decision will then be undertaken in discussion with the ecological clerk of works over the construction activities that can take place in that area while the nest is active.</p> <p>In addition, there will be continued monitoring for Cetti warbler throughout the nesting season (March to August) by experienced ecologists. If singing males are present the site manager will be notified and steps taken to introduce</p>	How does the applicant propose to locate Cetti's Warbler nests given the skulking nature of this species which makes them difficult to accurately locate?

Ref. No	Topic	Summary of submission	SCC Response
		construction works in the area prior to a nest being established.	
REAC B59	Landfall Method Statement	The Undertaker shall prepare a HDD landfall Method Statement and Drilling Fluid Management Plan in consultation with Natural England (NE), Kent Wildlife Trust (KWT) and Royal Society for the Protection of Birds (RSPB), National Trust, and Thanet District Council, and submit the same for approval by the Marine National Grid   March 2026   Sea Link 36REAC Ref Commitment Management Organisation (MMO) in accordance with the Cable Specification and Installation Plan prior to the commencement of any HDD activities.	SCC Ecology/SCC would like to be included in the consultation for this method statement.
REAC B66 to REAC B69	Measures with regard to features present at the Kent landfall site		These references are for the Kent landfall site – SCC Ecology therefore have no comments to make on these points.
REAC AQ15	Impacts on air quality sensitive receptors	Where substantial maintenance activities are required during the operational phase and have the potential to generate dust or emissions, proportionate dust and emissions management	What would constitute ‘substantial’? If any maintenance activity has the potential to generate dust and emissions, substantial or otherwise, then we would expect

Ref. No	Topic	Summary of submission	SCC Response
		<p>measures consistent with those committed to for the construction phase shall be implemented, as appropriate, to minimise any effects on air quality. These measures include AQ02, AQ03, AQ04, AQ05, AQ06, AQ07, AQ08, AQ09, AQ10, AQ11 and AQ12 as set out in this document.</p>	<p>proportionate dust and emissions management measures to be put in place in order to protect health.</p>
REAC A02	Dangerous Trees	<p>A pre-construction check will be undertaken of trees within the Order Limits and remedial works actioned where appropriate (e.g. where they pose an unacceptable risk to people or property). Trees will be monitored during the construction period, and during operation where they pose a risk to infrastructure constructed as part of the Proposed Project. All staff operating on the Site are to be made aware of the need to look out for obvious signs of tree defects and to report them to the Site Manager who will seek further advice as necessary. Where remedial works are required in respect of those trees which are subject of commitment A05, then details of such works will be agreed in advance with the relevant local planning</p>	<p>SCC considers that there needs to be a post completion safety audit for all trees that may have been adversely affected by the development and could therefore be or become a danger to life and property. This goes beyond the being a danger to the newly built infrastructure and needs to include third party property and and health and safety of all users. The audit also needs to include all potentially affected trees, not just those that could pose a risk to the new infrastructure.</p>

Ref. No	Topic	Summary of submission	SCC Response
		authority, save where already addressed in the Arboricultural Method Statement as required by Requirement 8, Schedule 3 and save in the case of emergency.	
REAC A03	Physical damage to trees	A banksman will be used where the movement of plant or long reach machinery occurs within 5m of any part of a retained tree to ensure no damage is sustained. Works within 5m of any part of a retained tree should only occur if they cannot be avoided.	SCC queries whether this only refers to fly-over incursions. If this includes machinery entering the RPAs, then SCC would expect to see a cross-reference here to special construction methods, including the use of mats to prevent soil compaction.
REAC A06	Additional tree work	Will require approval from relevant local authority.	This is acceptable provided that AMS and TPP are also agreed with the relevant local authorities.
REAC A21	Loss of trees	Replacement planting at ratio of 3:1	The commitment by the Applicant to replace each lost mature tree with three new trees is welcomed by SCC. However, SCC does not recommend the planting of standard trees, unless there is bespoke aftercare (in particular, watering) provided also. SCC would recommend choosing smaller sizes, such as feathered trees, as they would be easier to establish/replace, should they fail.
REAC	Trees and hedgerows	Pre-commencement works	SCC is concerned about paragraph 3 of Requirement 5 of the draft DCO, which specifies that all pre-commencement operations must be carried 'in accordance with the plans

Ref. No	Topic	Summary of submission	SCC Response
			<p>listed in paragraph (2) above, the outline management plans...’.</p> <p>The concern is that this may lead to unnecessary vegetation loss, given that at DCO consent stage the Rochdale Envelope is applied, allowing for a reasonable worst- case scenario, including for vegetation loss. SCC therefore expects that vegetation removal will be finetuned and further reduced during the detailed design stage.</p> <p>The wording of paragraph 3 does not incentivise the Applicant to provide updated plans detailing and further reducing the removal of vegetation (including mature, veteran, ancient trees and important hedgerows) based on the detailed design and micro-siting prior to pre-commencement operations, which currently include site clearance and temporary accesses, both likely to incur vegetation losses.</p> <p>SCC would welcome a commitment in the REAC that will ensure that vegetation removal is only carried out as far as necessary, based on the latest design and not in accordance with potentially obsolete plans.</p>
REAC GG02	Control documents	No provision of Overarching Documents in addition to Outline Control Documents	SCC considers that post consent there will be the need of a detailed overall LEMP prior to the Stage LEMPs. SCC (Landscape) considers that it needs to be made clearer that

Ref. No	Topic	Summary of submission	SCC Response
			the contractor will need to comply with the agreed Stages Plans rather than with the Outline Plans approved at DCO consent, as the latter are produced to a Rochdale envelope and require refining (reducing impacts further where possible).
REAC GG06	Reinstatement	A full photographic/aerial footage and descriptive record of condition (pre-condition survey) will be carried out of the working areas that may be affected by the construction activities prior to these works commencing.	SCC would welcome, if it could be agreed that this record is made available to SCC or the relevant discharging authority. Please clarify the alternatives for aerial vs photographic footage. SCC considers that aerial photos of hedgerow will not provide sufficient information.
REAC GG07	Temporary change in land use, habitat loss and vegetation clearance	Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style/specification and quality to those that were removed where possible, with landowner consultation.	SCC considers any deviation from accurate reinstatement would need to be agreed with the relevant discharging authority.
REAC GG21	Construction Lighting	Lighting of lowest level	SCC (Landscape) recommends the use of warmer light (below 3000K), which can produce the same illumination levels.
REAC GG26	Fencing security requirements	Types of fencing	SCC welcomes that the fencing would not block any surface water flow, but queries the potential restriction on movement of wildlife, such as small mammals.

Ref. No	Topic	Summary of submission	SCC Response
REAC GG27	Impacts on human receptors from noise during construction works	Communication and complaints handling in relation to noise.	SCC queries, whether the commitment goes far enough and whether there should be consideration to provide an offer of temporary hotel accommodation to residents affected by noise/vibration beyond a defined threshold.
LV01	Impacts on Vegetation	Shrub planting, where trees cannot be replaced.	This is insufficient. Any trees that need to be removed to enable the scheme will need to be replaced at a ratio of 3:1. If replacement is not possible at the same location, due to planting restrictions over the cables, replacement will need to be included elsewhere within the DCO or outside as compensatory planting.
LV03	Aftercare	Five-year aftercare	<p>SCC considers that a five-year aftercare commitment may be sufficient for habitats that are more easily reinstated but considers it too short for tree and woodland planting and ecological habitats of higher distinctiveness.</p> <p>SCC considers that adaptive aftercare needs to include the temporal element, meaning that if there is a significant failure rate (such as 30%) the replacement planting in such areas will reset the clock for the aftercare period. This is yet to be anchored in the OLEMP <b>[REP4-064]</b> and LV03</p>

Ref. No	Topic	Summary of submission	SCC Response
REAC LV14	Fromus Bridge	The River Fromus bridge design shall be developed as described in Requirement 3(3).	SCC considers that the detailed design, including the bridge's layout and scale, design elements, materials, colours and finishes, need to be submitted to and approved by the relevant local authority and that Requirement 3 in the draft DCO needs to be strengthened in this regard (current wording only requires confirmation that the bridge design is within the parameters listed).