

SEA LINK

EN020026

Post-Hearing Submission for Issue Specific Hearing 3

Suffolk County Council

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Glossary of Acronyms

<i>BNG</i>	<i>Biodiversity Net Gain</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ExQ1</i>	<i>Examining Authority's First Written Questions</i>
<i>ESC</i>	<i>East Suffolk Council</i>
<i>EA1N</i>	<i>East Anglia One North</i>
<i>EA2</i>	<i>East Anglia Two</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ISH2</i>	<i>Issues Specific Hearing 2</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>LHA</i>	<i>Lead Highway Authority</i>
<i>LIR</i>	<i>Local Impact Report</i>
<i>NGET</i>	<i>National Grid Electricity Transmission</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OLEMP</i>	<i>Outline Landscape and Ecology Management Plan</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>PEIR</i>	<i>Preliminary Environment Impact Report</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>PROW</i>	<i>Public Rights of Way</i>
<i>RSPB</i>	<i>Royal Society for the Protection of Birds</i>
<i>SBIS</i>	<i>Suffolk Biodiversity Information Service</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SECHAONB</i>	<i>Suffolk and Essex Coast and Heaths Area of Outstanding Natural Beauty</i>
<i>SPA</i>	<i>Special Protection Area</i>
<i>SPR</i>	<i>Scottish Power Renewables</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 summary of the representations made by the Council at Issue Specific Hearing 3 (ISH3) held 25-27 March 2026. SCC has also included additional comments relevant to the agenda items. Examination Library references are used throughout to assist readers. Tables are numbered in line with the ISH3 agenda, items which were not relevant to Suffolk County Council have not been included in this submission.

Written Summary of Representations made at Issue Specific Hearing 3 (ISH3)

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
1. Welcome, introductions, arrangements for the Hearing		
1.1	<p>Suffolk County Council were represented by the following team in person:</p> <ul style="list-style-type: none"> • [REDACTED] • [REDACTED] – Senior Planning Officer (NSIPs) <p>Attending colleagues were supported by the following team virtually:</p> <ul style="list-style-type: none"> • [REDACTED] – National Infrastructure Planning Manager • [REDACTED] – Project Manager (NSIPs) • [REDACTED] – PRoW and Green Access Planning Manager • [REDACTED] – Green Access manager • [REDACTED] – Ecologist • [REDACTED] – Senior Landscape Officer • [REDACTED] – Project Lead – Public Health and Communities • [REDACTED] – Skills for Infrastructure Strategic Lead • [REDACTED] – Flood and Water Engineer 	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
2. Matters arising from the supplementary agenda		
2.1	No comments to make on this matter.	

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3. Water Environment		
3.1	<p>Flood Risk</p> <p>The applicant has submitted a draft technical statement ([REP5-134] - Document 9.122: Surface Water Flood Risk and Climate Change - Technical Note Planning Inspectorate Reference: EN020026 Rev A) regarding the surface water flood risk maps with climate change applied. The LLFA has replied to the applicant with some minor amendments including making the maps clearer in regard to the future predicted surface water risk around the proposed developed areas.</p> <p>Regarding the surface water drainage strategy (construction and operational), the parties are working together to resolve the outstanding matters ([REP5-083] - Document 9.17.1: Suffolk Drainage Strategy Planning Inspectorate Reference: EN020026 Rev B).</p> <p>SCC requested a note including climate change allowance maps for flood risk. This has been resolved upon receipt of the applicant's surface water flood risk and climate change technical note [REP5-134].</p> <p>It is also noted that a revised drainage strategy has been drafted, and ongoing constructive discussions between SCC and the applicant. Generally, the direction of travel is positive, and SCC anticipates that all of our outstanding concerns in relation to surface water risk at the Friston and Saxmundham sites can be resolved in due course.</p>	REP5-134 REP5-083

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
3.2	<p>The applicant’s approach to the sequential and exception tests</p> <p>As contained in response to AP 86 in [REP4-150]:</p> <p>For temporary works, however, it is not clear to SCC that the sequential test has been passed. This applies to the Applicant’s comments on temporary storage of construction materials and temporary accesses. For the former, the Applicant states that it will ‘seek to avoid storage of construction materials within Flood Zone 3 and areas of high and medium risk of flooding from surface water’ (para 3.2.13 of the FRA) as detailed in W06 of the CoCP. This fails to meet the sequential test as it has not been demonstrated that the location of these materials cannot be placed in areas of low surface water flood risk. The Applicant must commit to placing such materials in areas of low surface water flood risk in the absence of any demonstration that this is not feasible.</p> <p>Regarding temporary accesses, the Applicant says that “temporary access routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be suitably designed for flood resilience in accordance with any conditions of a Flood Risk Activity Permit and removed at the end of the construction phase, with the land reinstated.” However, a Flood Risk Activity Permit is not a mechanism whereby risk of surface water flooding is controlled. Therefore, committing to this permit does not allow for the sequential test to be passed in relation to surface water flooding were flood resilience through suitable design for temporary access routes considered necessary to pass, as appears to be implied by the Applicant.</p> <p>For the exception test, whilst it is recognised that the “wider sustainability benefits” referenced in part a of para 5.8.11 of EN-1 include those fulfilled in the need case of the development, consideration should also be given to the benefits given to the local community who may experience increased flood risk. At present, SCC considers more could be done to fulfil this in line with its representations on the</p>	REP4-150

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	<p>need for further mitigation and offsetting/compensatory measures. There is also potential to look at expanded community benefits provision beyond the minimum set out in government guidance should the decision maker consider it appropriate.</p> <p>SCC reiterates its concern regarding the temporary storage basin that it is a basin not a pond, whereas a pond retains permanent water, whereas a basin is a temporary measure, so that is a technical point which needs addressing. If the temporary storage basin is situated within Flood Zone 3 (A or B) and there is a significant flood event from the river which inundates the basin, then it cannot be used if there is a significant rainfall event from another catchment and as a result fills up the drainage system.</p> <p>SCC would suggest that the temporary storage basin should ideally be located in Flood Zone 1, or in a worse case Flood Zone 2. Alternatively, the Applicant could provide a different measure to store surface water rainfall during the construction period.</p> <p>Regarding exception testing, SCC would suggest that considering the local concern around flooding, mitigation measures in respect of this issue would form part of the consideration for the purposes of the exception test.</p>	
3.3	<p>Matters relating to the objectives of the Water Framework Directive</p> <p>SCC has no comments on make on this item and defers to relevant authorities such as the EA.</p>	

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4. Traffic and transport		
4.1	<p>Junction Capacity Modelling – responses and updates</p> <p>No data received at Deadline 5.</p> <p>SCC requested a wider selection of junctions to be modelled and provided a list of junctions it considered relevant for analysis in Appendix A of [REP3-101] response to the EXA's first set of questions. SCC's position remains that the cumulative impact of traffic on the A12 and other corridors has not been satisfactory assessed noting that both SZC and SPR undertook sensitivity testing to do so.</p> <p>Baseline data. As this was captured by the applicant in 2024 this will need to be reviewed against real time data collected by SZC surveys, noting that care needs to be taken to avoid double counting SPR and SZC traffic.</p> <p>The concern is that even small increases to traffic can trigger overcapacity or if that has already been reached increase delays disproportionately.</p> <p>SCC has asked the applicant on a number of occasions for a wider selection of junctions to be modelled, and this position has not changed since SCC issued its Local Impact Report. SCC set out the junctions of particular concern in [REP3-101] in a table in Appendix A.</p> <p>This has been communicated to the applicant in a number of discussions outside of the representations process. SCC does recognise that the junctions that have been chosen are the three set out at page 49 of [REP5-135]. SCC would still like to see junction modelling for a wider range of junctions but will comment on the modelling once this has been received from the applicant.</p>	

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	<p>SCC is in a unique position currently and it is the cumulative impacts of several projects in the area, which is causing concern, not just Sea Link. So, in proportion Sea Link is similar to the SPR projects with regards to HGV and worker traffic. But in addition, there is Sizewell C. Sizewell C and SPR have both undertaken sensitivity tests on the A12, in particularly to look at the impacts of cumulative traffic on the network. SCC is concerned that if Sea Link continue to only consider the impacts of their own project, the greater cumulative impacts will be missed.</p> <p>SCC did provide some information to show that the impact is not just peak on peak, but if you actually aggregate construction traffic from a number of projects, then there are actually peaks outside of that peak on peaks.</p> <p>SCC notes there has been reference to Bramford to Twinstead when considering impacts, but in terms of caps which is a completely different scenario as the routes involved were not affected by other projects. As it stands there is Sizewell C, two SPR projects, and SCC with one our own projects in the vicinity of the A12 coming along in 2027-28.</p> <p>The new A1094/A12 Friday Street roundabout junction was opened to traffic on Monday March 23rd, although further works will be ongoing into July. Sizewell C will see numerous works projects, with the exception of the Two Village Bypass, southern roundabout and the SLR west roundabout joining onto the A12. These works will be completed by this summer, with a number of Deed of Obligation environmental mitigation schemes being delivered through 2026 into possibly early 2027 and may affect the A12 and the Two Village Bypass roundabout. The southern end is mainly offline.</p> <p>SCC has not received a programme for works as yet but expect them to take place in the next two years, with an opening in Q4 2027 to Q1 2028, and the same for the SLR roundabout south of Yoxford.</p>	

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	<p>There is also other works on the B1122, A1094 and the B1069, but these are expected to be complete within the next 12 months.</p> <p>The final scheme is the A12 MRN scheme, which is in Woodbridge, south of the A14. This is in the planning process, which is currently on hold due to the May county elections, so the decision has not been made, however, the original intention was to commence in 2027, but this is likely to be deferred by around six months.</p>	
4.2	<p>Driver delay mitigation</p> <p>SCC considers there are the following issues</p> <ul style="list-style-type: none"> • Cumulative journey time across the network due to additional NSIP traffic on the network on and across the A12 and other construction traffic routes. • Impacts on journey times caused by displaced local traffic (e.g. A1094/B1069) • Increase in risk by drivers joining main routes becoming frustrated and taking chances (e.g. Bell Lane Marlesford). <p>First two are largely economic and environmental and the latter safety related but this can vary on a case-by-case basis.</p> <p>Potential mitigation:</p> <p>Remove / minimise traffic – not an option as project needs to be delivered</p> <p>Traffic Calming. Signs and road markings. May have some effect by highlighting hazards. Can also have environmental benefits. Typically tailored to each site.</p>	

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	<p>Environmental: Embedded driver behaviour, timing, numbers, emission control. Site specific for particular users / receptors such as improvements to pedestrian crossings and / or footways.</p> <p>Speed Limits – reduce severity of collisions but may cause bunching and less space for joining traffic. Must be compliant with national and local guidance to avoid inappropriate limits with poor compliance.</p> <p>Other traffic restrictions e.g. weight limits. Should not be necessary to control project traffic as CTMP / CEMP does that. May be necessary for displaced or ‘ancillary’ traffic. Example HGVs servicing concrete batching plants / quarries. Difficult to enforce.</p> <p>Enforcement: One extreme are average speed cameras. Effective but costly to install and to maintain (admin resources). May also displace traffic onto other routes.</p> <p>SCC notes that the SZC commitment was to provide a funding and a mechanism to mitigate unforeseen impact during the construction phase of the project.</p> <p>SCC noted a junction which caused concern (A1094 into B1122) due to it being a tight corner which is not suitable for turning HGVs. SCC has concerns that if HGVs or long vehicles need to get in via this route, such as cable drums, then the vehicle would need to go up to the site compound via the B1069 Snape Road, turn around and come back down again. Or if the vehicle used the B1122 through Leiston, which SCC understands is a potential AIL route.</p> <p>SCC has taken the applicant’s data and also data from SPR projects from their CMP discharge of requirements, where they have updated their traffic figures and superimposed the data on a quarterly basis. The cumulative peak is not the SPR peak, nor is it at its ceiling, however both are at two thirds or their peak which results in actually going over the total peak as it would equal one and one third.</p>	

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	<p>SCC would expect the applicant to have modelled a realistic worst case, because this would be the cumulative impact, or at least a sensitivity test, again it will be covered by the cap so the cap would be at its peak. It would be useful to understand that cumulative impact and the sensitivity around the A1094 and the B1069 because the data SCC has been collating suggests there is more traffic than expected from previous forecasts and modelling.</p>	
<p>4.3</p>	<p>Effects of current planned highway works (such as the A12) on the proposed development construction traffic</p> <p>SZC improvements included as numbered works (e.g. relief roads / roundabouts) were designed to accommodate growth plus SZC / SPR traffic. Table 9.5 of the Consolidated Transport Assessment refers to this modelling. Those schemes within Deed of Obligation are largely environmental mitigation schemes and will not have been designed in terms of capacity.</p> <p>In general, the relief roads (TVB, SLR), Yoxford Roundabout) will deliver benefits in reduction in journey times and road safety albeit the park and ride sites and Deed of Obligation schemes (e.g. pedestrian crossings, speed limits) may have a direct negative impact on A12 journey times but are beneficial in terms of safety and indirectly by reducing worker traffic between the park and ride sites and the main site.</p> <p>In terms of delivery with the exception of the TVB and SLR the majority of the numbered highway works will be delivered by July 2026 (excepting landscaping). TVB are about to commence with most work being offline and opening in Q4 2027 or Q1 2028. These only affect both the A12 and B1122 and hence Sealink construction traffic when the new roads are tied into the existing.</p>	

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	<p>The Deed of Obligation schemes are in the process of delivery with the majority of those on the A12, B1122, A1094 delivered by the end of 2026.</p> <p>The SCC A12 MRN Scheme is awaiting a planning decision This is unlikely to be before Q2 2026 due to local elections. If so, the anticipated commencement early in 2027 is likely to be delayed.</p> <p>Progress on the development south of Saxmundham is outside SCCs control (need to check with ESC regarding progress of planning application) but is understood to include construction of a roundabout and a pedestrian crossing with speed limit reductions.</p>	
4.4	<p>Benhall Railway Bridge update and abnormal load routes</p> <p>SCC responded to Sealink AIP on the 19th March 2026 with technical comments. Hoping to resolve these in the next few weeks to allow investigations to proceed subject to road space being available. No request for further information has been requested but think this may be for the most recent inspection undertaken in Jan 2025.</p> <p>SCC cannot understand how the temporary bridge cannot be moved without closing the B1121 from the access to the River Fromus Bridge access referred to by Saxmundham Town Council diversion through the town is difficult. Key issues would be the low bridge on the B1119, narrow carriageway and lack of footways on the High Street, the steep junction and level crossing on Chantry Road and the safety concerns of using the A12/B1119 junction.</p> <p>No further information has been received from the applicant to consider the structures on wider routes such as the A12, B1122, B1069 or A1094.</p>	

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	<p>Update on structures at Little Glemham and Kelsale on A12 (south). Relaxation of STGO restrictions on these structures will be reviewed on the 13th April 2026. These restrictions were relaxed on a temporary basis subject to loads moving across structures at low speed without oncoming traffic.</p> <p>SCC preference would be a commitment to the applicant's option one if it is viable, which would either repair or strengthen the Benhall Railway Bridge. SCC has set out in a number of representations that there is a difference between repair, which would have wider community benefits and a more clearly defined single period of disruption, as opposed to the mini bridge which carries more long-term uncertainty.</p> <p>SCC is concerned that if only a 'preference' is secured then potentially nothing is actually secured and that concerns over cost might be used later to resort back to the mini bridge option, which SCC does not feel is appropriate as it would cause considerably greater cumulative effects.</p> <p>SCC would have the preference that the bridge works are completed before construction traffic for Sea Link starts but acknowledges that this might be challenging due to the discussions with third parties including SCC and Network Rail.</p> <p>If the bridge works would need to be undertaken during the Sea Link construction works, then it would be essential for there to be a restriction on Sea Link's HGV traffic whilst the bridge was closed to prevent the Sea Link HGVs adding to the diversion routes.</p> <p>SCC also has concerns regarding the capacity of the B1119/A12 junction in Saxmundham as adding HGVs here would cause issues.</p>	

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	<p>SCC remains concerned regarding the southern access route to the Saxmundham site due to the likelihood that much of the detail regarding the feasibility and delivery of either the repair of the Benhall Railway Bridge or the mini bridge option will still be outstanding at the close of the examination.</p> <p>There are also potential outstanding issues around the access to the White House Residential Park.</p> <p>SCC understands that the engineering elements involved in the southern are not insurmountable, however, it is normally the costs, delays and environmental issues which may make works unfeasible.</p> <p>The three main issues are: -</p> <ul style="list-style-type: none"> • Benhall Railway Bridge – If the bridge can be upgraded to be capable of carrying abnormal loads, then it is the logical route into the converter site directly from the A12, so it does have merits in transport terms. <p>It also provides a long-term legacy in that it provides a link from the A12 into the site, and possible the wider site as well.</p> <ul style="list-style-type: none"> • B1122/B1069 to access the site – SCC has raised concerns regarding the structures on this route not having been assessed, so there are restrictions on abnormal loads (not CNU 44 tonnes or less). • SZC Assessment of structures south of Yoxford to the A14 – These have been assessed on the basis of STGO3 moves. Bearing in mind structures change over time, they are, with two exceptions cleared for STGO3 use to Yoxford. The exceptions are two structures at Little Glenham and Kelsale which are both culverts. Little Glenham has a STGO1 restriction on it and Kelsale has a STGO, which basically means these will accept loads up to that loading in terms of weight. 	

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	<p>There has been a temporary relaxation of that to allow moves up to STGO3, which are permitted based on vehicles travelling at very low speed with no vehicles coming in the opposite direction. SCC have had difficulties in finding out whether this is being complied with. As a result, this arrangement will be undergoing a risk assessment in mid-April, this means it is problematic to get abnormal loads up the A12.</p> <p>What has not been assessed is special order movements, such as transformers. These have not been assessed by SZC and they have also not finished the assessments from Lowestoft to the south of Yoxford. As it stands, and it would depend on individual assessments, it may be highly likely there would be restrictions on any special-order movement on the A12 to even get to the proposed River Fromus bridge.</p>	
4.5	<p>Potential capping of heavy good vehicles using the local road networks</p> <p>SCC would welcome caps in a similar manner to SPR EA1(N), EA2 and SZC. These can be daily caps, peak hour and shoulder caps or a combination. If the ExA are minded accepting weekend working and HGV movements (for the stated restricted purposes) then caps should also apply to Saturday / Sunday.</p> <p>SCC notes the Applicant's response to 2TT7 which refers to the Bramford to Twinstead decision in 2024 not to enforce HGV caps on the local road network. However, as recognised by the Applicant, different projects are different. There are substantial differences in the context of cumulative development between the two projects.</p>	

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5. Socio-economics and tourism		
5.1	<p>Accommodation for workers of the proposed development</p> <p>We need to give clear consideration as to how this will be managed. Do the applicants have a clear idea of where workforce will be accommodated during the construction phase? We need to ensure that this is effectively managed to ensure that the workforce is effectively accommodated in a manner which does not adversely affect the visitor economy or rental sector. The applicant should work with representatives from both sectors to ensure that they are apprised of realistic numbers and timescales, as well as ensuring that appropriate TTW times and routes can be considered. If there is an effect beyond East Suffolk, this can be factored in and managed accordingly.</p> <p>It is inevitable that there will be crossover with Sizewell, as detailed below.</p> <p>SCC has concerns over the cumulative impact of multiple projects and the intersection between construction traffic, pressures on accommodation sectors and a wider economic impact of multiple projects happening in quick succession.</p> <p>There is likely to be impacts from SZC alongside others which could result in the road networked being potentially overwhelmed by levels of traffic, so there needs to provisions made to ensure emergency access will be in place.</p> <p>Whilst there maybe economic benefits, SCC does not want there to a disbenefit. SCC wants to see a thriving tourism and visitor economy at the end of the project.</p>	

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5.2	Tourism impact monitoring and mitigation	
	<p>There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C.</p> <p>At the time of writing, 2,000 workers are already onsite for Sizewell alone. Whilst there are some short-term benefits to be made for the accommodation sector and wider visitor economy, we need to ensure that we have a viable tourism economy once all NSIPs are complete. The sector has expressed concerns and the need to ensure that Suffolk still has a tourism economy which is attractive and accessible to visitors.</p> <p>Given the number of projects taking place over a relatively short period of time, it is inevitable that there will be some crossover, and it is important that the effects of all of them are taken into consideration. It would therefore be very difficult to consider them in isolation. One NSIP alone is likely to have some impact, to a greater to lesser degree. Multiple projects will likely have a significant impact</p> <p>We need to consider the practical aspects of how the construction phase would impact the visitor experience in a number of areas.</p> <p>Perception</p> <p>Is Suffolk likely to be viewed as a viable place for a short break or holiday? Word of mouth, particularly in an age of TripAdvisor and/or social media, can quickly lead to negative experiences and perceptions becoming widespread. Excess traffic and diversions create bad first impressions on arrival. Add to this excess noise, road closures, visual blight during construction phase and afterwards) etc and Suffolk</p>	

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	<p>could acquire an image which would be problematic. This in turn has the potential to lead to people holidaying elsewhere or at the very least not returning in the short to medium term.</p> <p>Practical effect on tourism businesses- Roadworks, delays, road closures etc all pose issues for businesses. The visitor economy relies on shift workers as well as prompt deliveries of fresh food and other supplies. If these need to be accommodated, then they need to be planned for, and mitigation measures need to be put in place to ensure that these can be overcome.</p> <p>Timescale</p> <p>Whilst Suffolk welcomes visitors all-year round and is a popular out of season weekend and short break location, there is clearly a traditional "high season" of July- early September where visitor numbers are at their peak. Whilst we strive to have good public transport links, we need to acknowledge that the bulk of visitors will travel by car and so traffic will be heavier during the peak period. There needs to be a balance struck between accommodating visitors, while acknowledging the practical benefits of a construction project taking place when the weather is good.</p> <p>Marketing and publicity</p> <p>If NSIPs are likely to happen, then there needs to be adequate notice given and the operators need to work with the sector to ensure that the messages convey the fact that Suffolk is still open for business and welcoming visitors. Sizewell C has a tourism mitigation fund, which is working with the sector to convey such messages. As part of this work, it is carrying out perception studies and collating baseline data on visitor numbers, spend etc across the district, in order to measure the effects on individual businesses, towns and the county as a whole. Organisations such as the Suffolk Coast Destination</p>	

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	Management Organisation (DMO) and the Suffolk and Norfolk Local Visitor Economy Partnership (LVEP) will be useful sources of support and information.	

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6. Health and Wellbeing		
6.1	<p>Core Working Hours</p> <p>Public Health</p> <p>The proposed construction core working hours as set out in [AS-127] are Monday – Friday 07:00 to 19:00; and Saturday, Sundays, and Bank Holidays: 07:00 to 17:00 plus start up and close down activities up to one hour either side of the core working hours. SCC recognise the Applicants comments detailed in [REP3-069] reference 1GEN49 regarding programme certainty, contractor logistics, national energy objectives, and potential constraint costs. The strategic need case and delivery pressures are noted. However, from a public health perspective, infrastructure delivery must be balanced against the protection of community health and wellbeing and should not come at a disproportionate cost to community mental health and quality of life, particularly where impacts are experienced over extended durations.</p> <p>Lengthy core working hours, including routine Sunday and Bank Holiday working, have the potential to materially reduce predictable periods of respite for affected communities over a prolonged construction programme. Sustained noise, vibration, and activity outside conventional weekday hours can contribute to sleep disturbance, stress, reduced respite, and wider mental wellbeing effects, even where technical thresholds for “significance” are not exceeded. Continuous exposure to stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities.</p>	[AS-127] [REP3-069]

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	<p>Whilst SCC recognises the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working across the onshore elements represents the least harmful approach, nor that alternative phasing or geographically targeted restrictions have been fully explored. Public Health therefore maintains that working hours are restricted to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC with start-up and close-down periods strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses. SCC notes that its proposed Core Working Hours submitted in its Schedule of Changes to the DCO retains 07:00 – 19:00 working which is due to consideration of the working hours of other DCOs, such as EA1N and EA2. It should be noted that, from a Public Health perspective, SCC would still recommend 08:00 – 18:00 from a Public Health perspective.</p> <p>Regarding piling works, Public Health welcomes the clarification that piling work is precluded on Sundays (unless otherwise approved by the relevant planning authority). We note the Applicant intends to allow for Saturday piling work both early morning (07:00-08:00) and afternoon piling (13:00- 17:00) when local residents might reasonably expect respite from such intrusive activities in those parts of their weekends. As proposed, this would leave only one day per week (Sunday) during which residents could expect a piling-free environment, whether to benefit from an uninterrupted morning rest or to enjoy time in their homes, gardens, or other amenity spaces in a piling free environment. This represents a significant and, in our view, unreasonable curtailment of residential amenity and overall quality of life. SCC therefore recommends that piling activity during these Saturday periods should be precluded, except where expressly approved by the relevant planning authority. This approach would retain necessary flexibility in circumstances where a clear and justified need for such activity can be demonstrated.</p>	

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	<p>SCC has given detailed representations on the adverse effects of extended working hours, the mitigation provided by their restriction and, by consequence, their necessity, in several previous representations including its LIR [REP1-130], responses to the Applicant at each deadline.</p> <p>SCC supports that there has been some movement on the core working hours with respect to piling works not taking place on Sundays, although, in addition, SCC would also like this to be extended to Saturdays.</p> <p>Comparing the Sea Link draft DCO to the SPR DCOs, there is a substantially greater number of exceptions in the Sea Link DCO which is an area of concern. This issue has been raised in SCC’s Local Impact Report and it is also important to note that Sea Link’s core working hours include an added hour before and after the time period for setting up and standing down activities, which is not included in the SPR working hours, which elongates Sea Link’s core working hours. SCC’s preference would be for these shoulder working hours to be removed or at least there was more clarity regarding or restrictions around what the shoulder hour activities would involve.</p> <p><u>Further comments</u></p> <p>The Applicant has previously used the status of its project as CNP, in addition to the Clean Power 2030 report, to justify the need for extended working hours. As pointed out by the ExA at the beginning of ISH 3, national policy does not allow the need case of CNP to be considered where their application presents unacceptable risks to human health. SCC submits that, in line with its previous representations, shortcomings in the Applicant’s assessment mean that the likely effects on human health have not been accurately portrayed. At least, SCC does not consider that there can be confidence that there will not be significant effects on human health / that there will not be substantial effects which would require</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>mitigation. SCC’s concerns relate both to the assessment of the project’s effects in isolation [APP-058] and cumulatively [APP-060].</p> <p>In addition to the shortcomings of the Applicant’s assessment, SCC considers that there is a large degree of uncertainty around what the effects of the project will be on account of the context of intense cumulative development. There is limited evidence to base predictions of cumulative effects on human health in this context. SCC made these points on page 53 of [REP4-150].</p> <p>SCC also considers that it is currently uncertain as to whether the Applicant will be in a position to deliver the project by 2030 in any event, having regard to the evidence given to the House of Commons Energy Security and Net Zero Committee by the DESNZ Head of Mission for Clean Power 2030 in January 2026 that there were two grid reinforcement projects that “at present are not on the right timetable”, one of which was this project, and that it was “presently on a 2031 timetable” (Q427 and Q428 of the evidence to the Committee on 14 January 2026, as recorded in Hansard).</p> <p>The Applicant stated that EN-1 identifies an urgent national need for electricity infrastructure of the nature of the Scheme, which is required in the national interest to be delivered as soon as possible, as quickly as possible, and at speed and scale. What is “possible” in the case of an individual project necessarily involves a consideration of whether and how the project as currently formulated complies with the guidance in EN-1 and EN-5 and with the decision-making tests in the Planning Act 2008. There is no imperative in either policy or in legislation to deliver a project with unacceptable impacts simply to meet a stated desire to progress as quickly as possible.</p> <p>SCC do not accept that recognition of the urgent need for electricity infrastructure in national policy statements EN-1 and EN-5 is as simplistic as alluded to by the Applicant. If the Secretary of State had opted to do so, it would have been easy to state in EN-1 or EN-5 that there is an urgent need for grid reinforcement</p>	

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	<p>which must be met by 2030, however, it is not explicitly stated. The policy is couched in terms of seeking to progress “as soon as possible” (para 3.3.83 of EN-1). This then raises the question of what is possible and that has to be seen within the context, first of all, of the statutory framework. Section 104(7) of the Planning Act 2008, as also reflected in EN-1 paragraph 4.1.5, outlines that the Secretary of State must be satisfied with the balance between adverse effects and the benefits of the Proposed Development. In drawing that balance it is relevant to have regard to whether the same (or similar) benefits could be achieved without imposing the same (or similar) adverse impacts, and that entails an adequate consideration of alternatives that could deliver the same grid reinforcement outcomes. In terms of consideration of strategic alternatives, SCC consider that there is a lack of clarity in the way the Applicant has presented material, particularly on costs and particularly the calculation of cost constraints. Therefore, SCC considers that there are clear factors that would place the positions in a different light if a proper review of the available alternatives was carried out.</p> <p>The Applicant’s case is that the Proposed Development must be delivered by 2030/2031 due to the significant costs incurred by constraint payments (where a Contract for Difference agreement is in place for a project and that the existing electricity transmission infrastructure cannot facilitate the additional supply). The Applicant utilises the contents of Table 3.2 (Planned Generation for East Anglia) of its Strategic Options Backcheck and Review [APP-320]. Upon sight, this table contains outdated information. For instance, LionLink has a listed completion date of 2024, however, Suffolk County Council is aware that this NSIP only recently conducted its Statutory Consultation (which will end on 10 March 2026) and this states an expected completion date of 2032 (as paragraph 2.4.1 of the LionLink Preliminary Environmental Information Report). SCC has therefore conducted a desktop review of [APP-320] and found the following information. The following projects are listed, however, do not have Contract for Difference agreement and therefore are unlikely to be progressed or built, either by the stated completion dates or potentially at all,</p>	

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	which alters the outcomes of calculations related to constraint payments:						
	Completion Year	Generation Name	Substation	Plant Type	Total Installed Capacity (MW)	Availability Factor	Scaled Generation Capacity (MW)
	2022	Brook Farm	Bramford 400kV	Energy Storage	49.9	0.83	41.4
	2024	Yare Power	Norwich 400kV	Energy Storage	49.5	0.83	41.1
	2028	East Anglia One North	Leiston [sic] 400kV	Wind	860.0	0.7	602.0
	2029	Lapwing Fen II	Walpole 400kV	Energy Storage	249.6	0.83	207.2
	2029	Bramford BESS	Bramford 400kV	Energy Storage	400.0	0.83	322.0
	2030	Scira- Dudgeon Extension Stg1	Norwich 400kV	Wind	719.0	0.7	503.3
	2030	Alchemy Bramford	Bramford 400kV	Energy Storage	500.0	0.83	415.0

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		Battery						
	2031	High Grove Solar	Necton 400kV	Energy Storage/PV Array	720.0	0.83	597.6	
	2031	Evolution Power Norfolk	Walpole 400kV	Energy Storage/PV Array	860.0	0.83	713.8	
	2031	Scira-Dudgeon Extension stg2	Norwich 400kV	Wind	231.0	0.7	161.7	
	2031	Norwich Green Energy Centre	Norwich 400kV	Energy Storage	400.0	0.83	332.0	
	2031	Norwich 100MW BESS	Norwich 400kV	Energy Storage	100.0	0.83	83.0	
	2032	GF Norwich BESS	Norwich 400kV	Energy Storage	400.0	0.83	332.0	
	2032	Bramford 2 GEC (Ethos Green)	Bramford 400kV	Demand/Energy Storage/PV	57.0	0.83	47.3	
	2032	Norwich	North	Energy Storage	249.9	0.83	207.4	

Agenda Item	Title of Matter and SCC's Written Summary of Representation							References
		Main BESS - Long Stratton Stg1	Anglia 400kV					
	2032	Necton Greener Grid Park	Necton 400kV	Energy Storage/Reactive Comp	78.0	0.83	64.7 MW	
	2033	Bramford GEC (Ethos Green)	Bramford 400kV	Demand/Energy Storage/PV	650.0	0.83	539.5	
	2033	ER BRF 2 Energy	Bramford 400kV	Energy Storage/PV Array	249.0	0.83	206.7	
	2033	Bradenham-Thetford (Necton) GEC (Ethos Green)	Necton 400kV	Demand/Energy Storage/PV	850.0	0.83	705.5	
	2033	Norwich 2 EDF	Norwich 400kV	PV Array/Wind	28.0	0.7	19.6	
	2033	Intwood Farm BESS	Norwich 400kV	Energy Storage	240.0	0.83	199.2	
	2034	Norwich Main BESS -	North Anglia	Energy Storage	700.0	0.83	581.0	

Agenda Item	Title of Matter and SCC's Written Summary of Representation							References
		Long Stratton Stg2	400kV					
	2034	Scira-Dudgeon Extension stg3	Norwich 400kV	Wind	400.0	0.7	280.0	
	2034	Wymondham Road Farm	Norwich 400kV	Energy Storage	228.0	0.83	189.2	
	2034	Necton High Impact Energy Hub	Necton 400kV	Energy Storage/PV Array/Onshore	1,000.0	0.7	700.0	
	2034	Zenobe Necton BESS	Necton 400kV	Energy Storage	300.0	0.83	249.0	
	2035	Sizewell C Stage 1	Sizewell 400kV	Nuclear	1,670.0	0.85	1,419.5	
	2036	Sizewell C Stage 2	Sizewell 400kV	Nuclear	1,670.0	0.85	1,419.5	
	<p>The Applicant is therefore requested to provide up-to-date information on its needs case so as to demonstrate how much capacity is actually needed by both 2030 and 2035 in terms of projects which are likely to be in place and generating electricity by those dates. In addition, the Applicant is requested to provide its detailed calculations for the claimed constraint costs which are said to arise if the project is</p>							

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>delayed due to restricted working hours, both in terms of sources of the input data, including the calculations made using the input data and their methodology, and in terms of the per capita (per consumer) cost of those constraint costs.”</p>	
<p>6.2</p>	<p>Mental Health Impacts</p> <p>The consenting, construction, and operation of major infrastructure projects such as the Proposed Scheme have the potential to give rise to significant and enduring effects on the mental health and wellbeing of local residents and communities. During the pre-construction and construction phases, changes to the local environment including alterations to landscape character, increased noise and air pollution, vibration, activity levels, and traffic disruption, alongside the introduction of large-scale infrastructure, can erode residents’ sense of place, belonging, and control. These effects can be compounded by uncertainty regarding the scale, duration, and nature of works, as well as concerns about access to essential services, community facilities, social infrastructure, and green and blue spaces. Such conditions can contribute to heightened stress, anxiety, and reduced quality of life, particularly among more vulnerable groups, including older people, disabled residents, and those without access to private transport.</p> <p>These effects may persist and evolve during the operational phase. The ongoing presence of large-scale infrastructure, together with visual intrusion, maintenance traffic, lighting, and changes in environmental conditions (including air quality, noise, and vibration), may continue to influence perceptions of comfort, safety, and security. This can alter local character and identity, contributing to feelings of loss, disconnection, and reduced satisfaction with the living environment. Concerns regarding perceived risks to health and safety, and the distribution of benefits and burdens associated with the Scheme may further contribute to sustained anxiety and mistrust within affected communities.</p>	<p>[APP-058] [APP-059] [APP-060] [REP1-130]</p>

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<p>A key consideration across all phases is the potential for cumulative effects, both intra and inter. The layering of impacts such as noise, vibration, traffic, lighting, and landscape change can intensify disruption and perceptions of inequity, erode community cohesion, and give rise to longer term psychosocial effects, including fatigue, frustration, and a diminished sense of control. These effects extend beyond physical disturbance and are central to understanding the full scope of health and wellbeing impacts associated with the Proposed Scheme.</p> <p>The Applicant’s intra-project cumulative effects assessment [APP-059] concludes that most effects are “<i>minor adverse (not significant)</i>” 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 decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific mitigation is confirmed for these cumulative effects.</p> <p>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 “<i>minor adverse (not significant)</i>” and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is “<i>not significant.</i>” SCC considers this conclusion to be insufficiently precautionary. There remains uncertainty regarding programme alignment across projects, and a reasonable worst-case scenario</p>	

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	<p>should account for overlapping peak construction periods, particularly in relation to Sizewell C and the removal of the EA1N/EA2 haul road.</p> <p>Regarding [APP-058], SCC Public Health challenges the assessment conclusion of 11.9.59 that likely effect on health and wellbeing arising from social cohesion and community identity impacts during the construction phase will be “<i>temporary minor adverse (not significant)</i>”. 11.9.53 notes “<i>Roads bordering the Suffolk Onshore Scheme may be used by construction traffic which could increase traffic and community severance between neighbourhoods.</i>” 11.9.54 suggests a lower sense of community in the area and 11.9.56 relating to [APP-048] landscape and visual which acknowledges “<i>the assessment concludes that a number of significant effects would remain</i>”. Paragraphs 11.9.85-11.9.86 concludes that the magnitude of impacts on health and wellbeing from social cohesion and community identity during the operational and maintenance phase would be small and therefore “<i>minor adverse (not significant)</i>”. These conclusions appear to underestimate the likely extent and persistence of community level stressors. It is not clear that the assessment has fully captured the psychological and social effects of long-term environmental change, including the perception of industrialisation of rural areas.</p> <p>Similarly, [APP-058], paragraphs 11.9.2 – 11.9.19 acknowledges that construction activities may temporarily restrict access to hospitals, GP practices, and other social infrastructure, and that increased traffic could contribute to community severance and inhibit access to healthcare facilities. The assessment concludes that the magnitude of effect would be ‘<i>negligible</i>’ and ‘<i>not significant</i>’ due to the limited duration of works, baseline capacity within local GP services, and the assumption that existing emergency services can absorb any additional demand. SCC considers this conclusion to understate the potential real-world effects. Even temporary disruptions can have meaningful consequences in rural areas where alternative access options are limited, particularly for vulnerable populations and those without</p>	

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	<p>access to private transport. The assessment does not adequately account for cumulative pressures arising from other NSIPs, nor the stress and uncertainty associated with disrupted access to healthcare.</p> <p>More broadly, SCC considers that the approach to cumulative assessment within [APP-058], [APP-059], and [APP-060] does not sufficiently reflect the lived experience of affected communities. Nor does it adequately account for the psychological and social impacts of prolonged uncertainty, repeated disruption, and the progressive industrialisation of the local environment. The cumulative sense of disruption, uncertainty, and loss of amenity, especially where multiple NSIPs are present or anticipated, can intensify adverse mental health outcomes beyond what is reflected in the Applicant’s “minor adverse” classification. This is particularly relevant for vulnerable groups, including older people, disabled residents, and those without access to private transport, who may have fewer options for respite or alternative access to services and green spaces.</p> <p>SCC does not agree with the conclusion of [APP-058] 11.11.2 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. Nor does SCC agree with the conclusion in [APP-060] 13.4.14 that health and wellbeing CEA anticipates no significant adverse effects on mental health. The Council considers that the assessments do not fully recognise or address the mental health impacts associated with the scheme, including those arising cumulatively from the concentration of multiple NSIPs in Suffolk. SCC has set out how mental health is likely to be affected as a result of the proposed development in paragraphs 14.56 and 14.57 of its LIR [REP1-130]. The Applicant’s assessments on mental health do not appear to take these considerations into account, undermining their reliability as a true representation of the likely effects on mental health in a worst-case scenario. The conclusions presented in paragraphs 11.11.2 and 13.4.14 of [APP-058] are considered unreasonably optimistic and do not reflect the lived reality of communities experiencing sequential and overlapping infrastructure development and</p>	

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	<p>the substantial pressures that are placed on wellbeing. SCC further notes that the Applicant’s assessment does not give specific consideration to neurodiverse individuals or those with sensory sensitivities, which is a notable omission within [APP-058]. Individuals within these groups, including those with autism spectrum conditions or sensory processing differences, may experience noise, vibration, visual disturbance, and increased traffic activity in a more acute or materially different way to neurotypical people. Effects may result in disproportionate and more severe impacts on mental health and wellbeing in this group.</p> <p>Furthermore, SCC considers that the assessment lacks sufficient detail in several key areas. While [APP-058] acknowledges potential increased demand on GP services, there is limited consideration of impacts on mental health services, including service capacity. The reliance on a 1:1800 GP-to-patient ratio (based on 2009 guidance) does not adequately reflect current demographic pressures or the specific characteristics of the Suffolk population, including its above-average age profile and the presence of other vulnerable groups.</p> <p>Paragraph 11.7.21 [APP-058] refers to Mental Health within Local Health Profiles, but does not set out a profile. The Council acknowledges the Applicant’s position but does not agree that it can replace a profile which is founded on evidence and data. A data driven profile would also allow SCC to evaluate whether the profile is an accurate reflection of mental health in the area and how robustly evidenced it is. Public Health therefore request that this data is provided and assessed. This exercise is essential to ensure that the Applicant’s assessment is based on an accurate baseline of mental health such that the adverse impacts are not underestimated. SCC therefore cannot presently agree that the Applicant’s assessment has been undertaken against a robust benchmark. Paragraph 11.7.42 could be improved by setting out broader demographic assessments. This should include unemployment rates, protected characteristics, gypsy/ travellers non-English speakers, people involved in the criminal justice system, refugees and/or asylum</p>	

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	<p>seekers, single parent families and people with low literacy/numeracy. The assessment should note if these groups are more likely to be adversely affected by the proposal, which should be reflected in their sensitivity classifications, and key learnings should be used to inform mitigations.</p> <p>Given the inherent uncertainty associated with predicting mental health and wellbeing impacts, particularly those arising cumulatively and over time, Public Health consider it essential that effects are actively monitored in a structured and proportionate manner. It is recommended the Applicant develop and implement a robust Mental Health and Wellbeing Monitoring Plan covering the construction phase and early years of operation, with clear reporting routes, defined review points, and mechanisms to trigger responsive mitigation where required.</p> <p>Another aspect which bolsters the necessity of a monitoring plan is potential adverse cumulative effects on vulnerable groups. The Applicant’s consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060] and [APP-058]. SCC is aware that a new SEND school will open in close proximity to the B1121 and the Applicant’s permanent access road¹. Consideration of how this vulnerable group, as well as this specific receptor, will be affected is therefore essential. For instance, members of certain vulnerable groups may be more susceptible to noise and vibration effects and the effects of high levels of HGVs due to the different ways sensory inputs affect them. It is therefore vital that effects on all vulnerable groups are considered and robustly monitored in addition to potential mitigation measures being identified.</p> <p><i>Monitoring</i></p>	

¹ See <https://www.bbc.co.uk/news/articles/cq6ve4e1n78o>

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	<p>Reliance solely on publicly available GP or Primary Care data would be insufficient, as this captures only those individuals who actively present and self-report. This approach risks underrepresenting wider community impacts, particularly among individuals who experience stress, anxiety or wellbeing deterioration but do not engage with formal health services.</p> <p>Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views are influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, survey and qualitative approaches can provide valuable triangulation when designed appropriately and interpreted alongside service data.</p> <p>Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include:</p> <ul style="list-style-type: none"> • Population health management (PHM) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services • Engagement with Primary Care leads within the project catchment to identify emerging trends • 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 <p>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:</p>	

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
	<ul style="list-style-type: none"> • 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 <p>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.</p> <p>Without such a structured monitoring plan, there is a risk that mental health and wellbeing impacts are either under-detected or interpreted in isolation, limiting the ability to respond proportionately and effectively.</p>	
7. Cultural Heritage		

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
7.1	<p>Archaeology update and assessed impacts</p> <p><u>Summary of positions</u></p> <p>SCCAS are satisfied with the scope and extent of archaeological evaluation work which has been undertaken so far and that sufficient provisions are being made with regards to completing evaluation work within the remaining small areas of the scheme where this has not been possible, due to various constraints, post-consent.</p> <p>SCCAS are also satisfied with the assessment of impacts with regards to archaeological heritage assets within areas where archaeological evaluation has already been completed and that provisions are being made to undertake appropriate archaeological mitigation work post-consent in order to offset the harm to below ground archaeological remains which will be caused by the development. SCCAS are currently in discussion with the Applicant's archaeological consultant to agree the detailed location and scope of ongoing archaeological assessment and mitigation work, taking into account the results of previous evaluation work and assessments of significance and impact.</p> <p><u>Suffolk OWSI</u></p> <p>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 the amendments already made in response to comments by SCC 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.</p> <p>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-</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>commencement as well as construction works) and the safeguards which will be put in 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.</p> <p><u>Requirement 14 and pre-commencement works</u></p> <p>Whilst the wording of DCO 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 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.</p>	

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	<p><u>How our concern should be secured</u></p> <p>As well as the necessary timing of archaeological work being more clearly set out within the OWSI, 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'.</p> <p>SCCAS would also advise that within the CEMP, greater clarity and detail regarding the pre-commencement and construction activities which have the potential to impact upon buried archaeological remains is needed.</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 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>The need for archaeological works to precede other scheme works should also be clearly set out within all relevant project documentation e.g. the Suffolk Drainage strategy.</p> <p><u>Regarding the Friston D-Shaped enclosure and change request:</u></p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>During the hearing, the Applicant indicated that the intended approach to mitigation of the regionally significant D-shaped enclosure would be to preserve it in situ. SCCAS would strongly support this as the preferred and optimum mitigation approach, although would not object to excavation of this site should plans change.</p> <p>SCCAS would however 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, should preservation in situ become no longer possible, this monument would need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route, through the excavation of this monument in its entirety.</p>	
7.2	<p>Setting of heritage assets, including cumulative impacts</p> <p>SCC considers the effects on the Fromus Valley and the setting of its heritage assets, resulting from the proposed access road and bridge, unacceptable and has provided detailed comments on this in the LIR [REP1-130].</p> <p>SCC considers that there may be intra-cumulative effects resulting from the proposed access and the converter station on Hurts Hall and The Layers but defers to Historic England and East Suffolk Council for detailed comments.</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	SCCAS defer to Historic England and East Suffolk Council on this matter.	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
8. Cumulative effects		
8.1	<p>Intra-project cumulative effects including the estimation of significance and need for mitigation (including how that is secured)</p> <p>SCC maintains that a precautionary approach to the inter and intra project related mental health impacts is appropriate due to what both residential and non-residential receptors will be experiencing with the Sea Link project. This is set out in SCC's previous response to ExQ1 [REP3-101] and ExQ2 [REP5-204].</p> <p>The project sits within the context of a really intense period of NSIP development locally and Sea Link cannot be divorced from this fact. In terms of specific mitigation measures that SCC believes to be necessary, these have been set out in [REP5-204], particularly regarding public rights of way (PRoW) in pages 49-51 of this document, which SCC continues to endorse. SCC has also proposed some revised wording for REAC, which SCC also still supports.</p> <p>Regarding the proposed mental health mitigation and monitoring plan, there is unlikely to be agreement between the applicant and SCC, but SCC believes that a targeted mitigation in the form of contributions to a plan here would be appropriate given the potential effects on mental health from a whole range of sources, such as traffic disruption, potential sleep disruption and potential noise impacts from extended working hours outside of core hours on certain occasions. These impacts can be assessed in isolation but can be difficult to assess cumulatively.</p> <p>SCC notes that the applicant does not consider monitoring to be necessary and therefore it seems likely to be an item that will be a decision for the panel.</p>	

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	<p>Regarding the mitigation on the PRow, there are certain measures about construction hours here, but there was also a proposal that SCC has made for a new PRow to run east to west along the B1119 to link other parks of the PRow network. The applicant has pushed back on this proposal, considering the new PRow to be an enhancement rather than mitigation. As the only assessed significant effect on the PRow network is bridleway 4910, SCC position is that there is cumulative potential degradation of the PRow network as a result of the Sea Link project, which, whilst the impact on an individual PRow might not rise to the threshold of significance, the experience for someone using that PRow network might be quite seriously degraded by individual non-significant effects. This is why SCC considers the new PRow along the B1119 would be appropriate as mitigation rather than enhancement.</p> <p>Socioeconomics:</p> <p>On a wider economic point, we also need to consider where the workforce and materials will be drawn from for this and other NSIP initiatives. Again, coming back to the point about the cumulative effect, we need to be mindful of how LionLink will work alongside the other projects.</p> <p>While we would obviously want to see the economic benefits for the Suffolk economy (and an appropriate sourcing tool might be something like the Suffolk Supply Chain) we need to ensure that we are able to provide the labour and materials when required. If done effectively, then it will be a welcome boost for Suffolk businesses and employment figures. If materials and workforce are to be transported into Suffolk, then we need to return to the point about additional traffic on the county's roads and pressure on bedspaces. Whilst we welcome the economic and practical benefits of the SeaLink scheme, we need to ensure that any potential disbenefits are considered and effectively mitigated against.</p>	

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8.2	<p>Matters relating to the application of the mitigation hierarchy</p> <p>SCC Planning</p> <p>There is nothing in EN-1 or EN-5 which restricts the application of the mitigation hierarchy in relation to cumulative effects. Nor does the NPS exclude CNP infrastructure from following the mitigation hierarchy. Therefore, likely significant adverse effects must be mitigated or, where possible, offset.</p> <p>SCC does not consider relevant policy to necessarily restrict the mitigation hierarchy to significant effects, however, as explained in relation to effects on PRoW in response to the Applicant's answer to 1TT16 of ExQ1 [REP4-203]:</p> <p>SCC considers that, for certain technical areas, there is great difficulty in determining how to apply the mitigation hierarchy. This is on account of the shortcomings of the Applicant's assessments which form the Environmental Statement. SCC has relayed severe concerns with various aspects of assessments, including methodology, evidence bases and reasonings behind professional judgements, in relation to several ES assessment chapters such as Health and Wellbeing, Traffic and Transport (including PRoW) and Socioeconomics and Tourism. Whilst these issues have consequences for the application of the mitigation hierarchy when considering the project in isolation, there are also consequences when considering cumulative effect, both inter and intra project. This is because SCC's concerns undermine the robustness of the conclusions of the assessments of the project in isolation and it is these conclusions which form the basis of the cumulative effects assessments. This creates uncertainty as to what the magnitude of the likely worst-case scenario adverse cumulative effects will actually be.</p>	

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	<p>It should be noted that there is limited evidence from which worst case scenario effects can be predicted, particularly for aspects of Socioeconomics and Tourism and Health and Wellbeing.</p> <p>Further uncertainty is added through the cumulative context of this project in Suffolk. For one thing, there remains varying degrees of uncertainty over how the effects of existing and future cumulative NSIPs will actualise. For existing projects, the Applicant has relied upon the Environmental statements of those projects which are several years old despite the presence of more recent data. In particular, Sizewell C, the status of which as a mega-project exacerbates this uncertainty, submitted its Environmental Statement in May 2020.</p> <p>Socio-economics</p> <p>SCC's published socio-economic guidance requires NSIP promoters to undertake detailed workforce modelling, including phase-specific labour profiles, skills requirements, home-based and non-home-based labour geographies, and scenario-based assessments using worst-case assumptions. These requirements exist to allow meaningful assessment of displacement, labour shortage risks, strain on local services, and cumulative interactions with other NSIPs. None of this information has been provided by the Applicant. Instead, they rely on a generalised drive-time-based labour catchment, alongside an assumed 70% workforce leakage, without any analysis of cumulative pressures or whether the remaining 30% could realistically be sourced locally.</p> <p>The Applicant does not address the cumulative skills demand and workforce competition created by Sea Link when combined with other major NSIPs taking place in Suffolk and the wider region. Overlapping projects will draw on the same specialised construction and engineering skills across similar time periods. This is a foreseeable cause of skilled-labour shortages, displacement, wage inflation, and supply-chain competition. The Applicant does not acknowledge these cumulative</p>	

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	<p>interactions, nor does it propose measures to coordinate skills pipelines, synchronise workforce demand or support local labour markets.</p> <p>No assessment has been provided regarding the availability of, or pressure on, training and education providers. SCC’s guidance clearly states that developers must collaborate through the Regional Skills Coordination Function (RSCF) to assess local capacity, align training pathways with project phasing, and develop targeted interventions for skills shortages.</p> <p>The Applicant also omits any assessment of non-home-based labour or temporary accommodation requirements, despite the expectation that this information must be provided. Without quantification of non-home-based workforce numbers, it is not possible to assess impacts known to be sensitive under cumulative NSIP pressures.</p> <p>Supply-chain impacts are similarly underdeveloped. There is no scenario-based assessment of supply-chain capacity, no definition of hyper-local, local, or regional supply-chain geographies, and no analysis of cumulative competition between large infrastructure schemes for contractors and specialist SMEs. The Applicant does not provide a structured, measurable, and enforceable approach to supply-chain development or displacement mitigation.</p> <p>The Applicant’s skills and employment plan must include cumulative workforce modelling, a local education and training strategy co-developed with the RSCF, supply-chain scenario analysis, measures to mitigate labour-market displacement and cumulative demand, and a governance, monitoring, and adaptive-management framework. These measures are necessary to address foreseeable cumulative socio-economic effects, relevant to the project’s impacts, enforceable through the DCO, and proportionate to the cumulative NSIP environment in Suffolk.</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>Without these measures, Sea Link risks exacerbating labour-market pressures, reducing opportunities for local residents, straining the local training system, undermining local businesses, and intensifying cumulative socio-economic impacts associated with multiple overlapping NSIPs.</p> <p>Landscape</p> <p>In terms of cumulative landscape and visual impacts and effects, SCC considers that the mitigation hierarchy needs to be applied in full. This calls on promoters to work as closely together as possible to avoid and minimise cumulative adverse impacts and effects and respect, support, and build on other project's mitigation measures, through co-ordination, cooperation, and collaboration.)</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	10. Noise and vibration	
10.1	<p>Construction noise effects and mitigation</p> <p>SCC defer to East Suffolk Council on this matter</p>	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
10.2	Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable SCC defer to East Suffolk Council on this matter	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
11. Air quality		

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
11.1	Traffic emissions assessment SCC defer to East Suffolk Council on this matter	
11.2	Operational back-up generator assessment including, but not limited to, potential for eutrophication impacts and cumulative effects with SPR proposals. SCC defer to East Suffolk Council on this matter	
11.3	Air quality mitigation measures including enforceability and water for dust suppression in Suffolk SCC defer to East Suffolk Council on this matter	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
12. Ornithology		

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
12.1	Update on red-throated diver displacement assessment	
1.5.3	SCC Ecology are in agreement with the measures stated in the Red-Throated Diver Protocol report. The stated measures (restrictions on cable burying operations from 1 st November – 31 st March in the Outer Thames SPA are, in the opinion of SCC Ecology, sufficient to minimise the risk of disturbing any overwintering Red-Throated Divers and any other seabirds that are prone to disturbance from vessel movements.	7.8 (B) - Red-Throated Diver Protocol
12.2	Seasonal restriction for all activities including pre-lay grapnel run	
1.5.3 Red-Throated Diver Protocol	The seasonal restrictions listed in the Red-Throated Diver Protocol report (full restrictions on cable laying operations in the Outer Thames SPA between November 1 st & March 31 st and limited restrictions on landfall cable installation between January 1 st & March 31 st are appropriate and will minimise the risk of vessel movements and other operations disturbing sensitive species that overwinter in the Outer Thames SPA boundary (Red-Throated Diver, Lesser Black-Backed Gull, Cormorant, Brent Goose).	7.8(B) - Red-Throated Diver Protocol
12.3	Application of a 2km buffer for vessel displacement	
12.4	Potential derogation and compensation in respect of emergency repairs	
13. Ecology and Biodiversity		

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
13.1	Whether the potential disturbance effects of terrestrial unexploded ordnance have been sufficiently addressed in the applicant's ecological assessments	
	The overarching onshore CEMP includes an appendix titled Unexploded Ordnance Risk Assessment. Provided the measures stated in this document are implemented and strictly adhered to during operations onsite, SCC Ecology are satisfied the potential disturbance effects of terrestrial UXO have been addressed sufficiently.	7.5.3 - outline onshore Construction Environmental Management Plan (Appendix A)
13.2	Mitigation for riparian mammal activity	
	<p>There are measures to ensure the potential disturbance of Water Vole resulting from operations through an ecological watching brief and restricting vegetation clearance works to between 15th February & 15th April or 15th September & 31st October. SCC Ecology consider this appropriate with regard to mitigating potential harm to Water Vole.</p> <p>SCC Ecology would like to know why there have been no mitigation measures for Otter included in the Ecology & Biodiversity report, particularly when evidence of Otter (spraint, possible holt/slides) were found close to the extent of the order limits.</p>	Suffolk Ecology & Biodiversity report – Section 2.8.5
13.3	Bats including, but not limited to, update on Natural England licensing team barbastelle bat discussions, use of hedgerow gaps vs HDD (including evidence of programme constraints) and mitigation for Daubenton's bats in Pegwell Bay	

Agenda Item	Title of Matter and SCC's Written Summary of Representation	References
	<p>The matter regarding Daubenton's Bats in Pegwell Bay concerns the landfall site in Kent, therefore SCC Ecology have no comments to make on this particular matter.</p> <p>Where the cable route crosses hedgerows, SCC Ecology would prefer to see HDD employed to ensure and maintain habitat connectivity, thus minimising gaps in the hedgerows. Where HDD is not possible or considered appropriate, dead hedging must be used to maintain habitat connectivity throughout the order limits.</p>	
13.4	Pegwell Bay and former hoverport access and disturbance	
	<p>This item concerns potential impacts on the landfall site in Kent. SCC Ecology have no comments to make on this matter.</p>	
13.5	Control of activities under requirements 5 and 6, including consideration of whether the outline landscape and ecological management plan should contain more specific survey methodologies (or provision to secure this detail)	
	<p>SCC Ecology feel the survey methodologies are sufficiently covered in other documents and do not think it is necessary to repeat them in the oLEMP. Reference to the documents containing the respective survey methodologies could be made in the oLEMP where appropriate.</p> <p>SCC Ecology would like to see surveys for Skylark & Woodlark on the Skylark Enhancement Areas following their establishment.</p>	<p>Outline Landscape & Ecological Management Plan Section 5.4.1</p>

Agenda Item	Title of Matter and SCC’s Written Summary of Representation	References
13.6	<p>Biodiversity net gain including, but not limited to, an applicant update on progress with legal agreements and details of proposals</p>	
	<p>The works along the Suffolk landfall corridor will result in an approximate 26% loss in area habitats. As this loss cannot be rectified through the delivery of onsite BNG, SCC Ecology are keen to hear how the applicant proposes to deliver this BNG. Details of how this will be delivered (presumably through offsite credits?) and where these credits will be located are what SCC Ecology would like to know with regard to the delivery of BNG. Ideally, these BNG credits will be located in Suffolk and as close to the order limits as possible but appreciate this might not be achievable.</p>	