The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.15: Statement of Common Ground Between National Grid Electricity Transmission and the East Suffolk Council

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1. Introduction

1.1 Overview

1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application ("The Application") for the Sea Link Project ("Proposed Project") made by National Grid Electricity Transmission Ltd ("the Applicant"). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.

1.1.2 A SoCG is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is no agreement.

1.1.3 During the examination the aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination.

1.1.4 At the final deadline a SoCG can assist the Examining Authority by identifying areas on which it has not been possible to reach an agreement

1.2 This Statement of Common Ground

1.2.1 This SoCG has been prepared between the Applicant and East Suffolk Council (ESC). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).

1.2.2 It should be noted that a combined SoCG with both ESC and Suffolk County Council (SCC) was submitted with the DCO application (**Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329]**). As agreed with both Councils, the combined SoCG was split into one for each Council so that the positions being raised by each could be responded to more directly and in order to keep each SoCG more focused on the issues relevant to them. **Application Document 9.15 Draft Statement of Common Ground Between National Grid Electricity Transmission and the East Suffolk Council [REP3-058]** was submitted at Deadline 3.

1.2.3 Since then, Section 3 Areas of Discussion Between the Parties has been restructured following further discussions with ESC in order to ensure the SoCG is reflecting the latest positions of both Parties and so it is more focused on the matters to be agreed. Section 3.1 now contains the matters from ESC's Deadline 5 Principal Areas of Disagreement Summary Statement (PADSS) as well as some additional matters from the previous version of the SoCG as discussed with ESC with regards to health and wellbeing and the draft Development Consent Order (DCO). Section 3.2 contains the matters which had already been agreed in previous iterations of the SoCG prior to Deadline 5.

1.2.4 This SoCG has been progressed during the pre-examination and examination periods to reach a final position between the Applicant and ESC and to identify those issues

which remain unresolved. It has been revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.

1.2.5 For the purpose of this SoCG, the Applicant and ESC are jointly referred to as the "Parties".

1.3 The Role of East Suffolk Council in the DCO Process

1.3.1 ESC is a local authority for the purposes of Section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the Proposed Project is within their local authority area. Pursuant to Section 42 of the Planning Act 2008, National Grid must consult local authorities (referred to as host authorities) if the Proposed Project is in a local authority's area.

1.3.2 ESC's role in the Development Consent Order (DCO) process derives from the Planning Act 2008. The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of ESC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:

- Providing the local perspective at the pre-application stage, in addition to any views expressed directly to the applicant by residents, groups and businesses.
- Preparing written representations, SoCGs and Local Impact Reports ready for examination.
- Attending and participating in hearings and/or accompanied site visits.
- Discharging many of the requirements associated with a DCO if consent in granted.
- Monitoring and enforcing many of the DCO provisions and requirements.

1.4 Description of the Proposed Project

1.4.1 The Proposed Project is described in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.

1.5 Format of Document and Terminology used.

1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.

1.5.2 Section 3 of this SoCG summarises the issues that are 'agreed' or 'not agreed'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved.

1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
ACMP	Anglican Coastal Monitoring Programme
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
ASTI	Accelerated Strategic Transmission Investment
BPM	Best Practical Means
BNG	Biodiversity Net Gain
CEA	Cumulative Effects Assessment
CEMP	Construction Environment Management Plan
CIPD	Chartered Institute of Personnel and Development
CNVMP	Construction Noise and Vibration Management Plan
CoCP	Code of Construction Practice
CRTN	Calculation of Road Traffic Noise
CSE	Cable Sealing End
CTMP	Construction Traffic Management Plan
CTMTP	Construction Traffic Management and Travel Plan
DCO	Development Consent Order
DESNZ	Department of Energy Security and Net Zero
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
DOL	Depth of Lowering
DRP	Design Review Panel

Abbreviation/Term	Definition
EA	Environment Agency
EACN	East Anglican Connection Network
EIA	Environmental Impact Assessment
EPUK	Environment Protection UK
ES	Environmental Statement
ESC	East Suffolk Council
ESO	Electricity System Operator
FEED	Front End Engineering Design
FRA	Flood Risk Assessment
GVA	Gross Value Added
HAEP	Host Authority Engagement Plan
HE	Historic England
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAQM	Institute of Air Quality Management
IDB	Internal Drainage Board
IEMA	Institute of Environmental Management and Assessment
KCC	Kent County Council
LCA	Landscape Character Area
(Outline) LEMP	(Outline) Landscape and Ecology Management Plan
(Outline) LEMS	(Outline) Landscape ecology management Strategy)

Abbreviation/Term	Definition
LHA	Local Highway Authority
LOAEL	Low Observable Adverse Effect Level
LOD	Limits of Deviation
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MMO	Marine Management Outline
NE	Natural England
NESO	National Electricity System Operator
NETS	National Electricity Transmission System
NGET	National Grid Electricity Transmission
NGV	National Grid Ventures
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSRI	National Soil Resources Institute
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptors
NVMP	Noise and Vibration Management Plan
OCSS	Offshore Coordination Support Scheme
OWSI	(Outline Onshore) Overarching Written Scheme of Investigation
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Rights of Way

Abbreviation/Term	Definition
REAC	Register of Environmental Actions and Commitments
RPA	Root Protection Area
RSPB	Royal Society for the Protection of Birds
SCA	Seascape Character Area
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SCZ	Secondary Consultation Zone
SoCG	Statement of Common Ground
SoS	Secretary of State
SPR	Scottish Power Renewable
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TCPA	Town and Country Planning Application
TTM	Temporary Traffic Management
WHO	World Health Organisation
WFD	Water Framework Directive

2. Record of Engagement

2.1 Summary of discussions

2.1.1 Appendix A summarises the consultation and engagement that has taken place between the Parties.

3. Areas of Discussion Between the Parties

3.1.1 This SOCG is submitted further to the PADSS issued by ESC at Deadline 5 **[REP5-184]**, and the topic matters listed in Section 3.1 of this SoCG are based upon that document. Where a matter is not covered by this SOCG it is because the topic is either agreed with National Grid or because it is a topic which is not of principal concern to ESC.

3.2 Matters to be agreed based on Deadline 5 PADSS

Table 3.1 Need Case

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.1.1	**N/A**	Need for the Project	See Section 4 of ESC's LIR [REP1-128]. ESC is extremely concerned as to the timing of the delivery of Sea Link and its relationship with the timing of other Nationally Significant Infrastructure Projects (NSIPs) being delivered within the East Suffolk District, in light of the anticipated onshore impacts collectively introduced by these projects. The need case is predicated on the Sizewell Generation Group. However, Sizewell C is approximately 10 years away from generating power. Nautilus is no longer proposed to connect into Suffolk and LionLink has been materially delayed as compared to the assumptions in the needs case and will be 6-7 years away from completion if and when consented. Given the completion timeframes of Sizewell C and LionLink, the project is considered to be premature and, importantly, as a result has missed opportunities for real coordination with future projects. Further, should the identified projects not become operational at the times anticipated or not be delivered at all, then it follows that this fundamentally changes the need for Sea Link. As stated, this is significant because project prematurity restricts opportunities for meaningful coordination with other projects looking to connect at Friston, such as LionLink, which only accentuates local concerns regarding cumulative impacts. ESC and the Applicant fundamentally disagree on the need case presented for Sea Link. Agreement on need has therefore not been reached. This is confirmed by the Applicant's dismissal of ESC's concerns in its response to ESC's LIR [REP2-027] and its response – or lack of response – to more recent representations. In particular, to supplement the points made above, ESC together with Suffolk Energy Action Solutions has drawn attention to the fact that the NESO Clean Power Report can no longer be relied upon by the Applicant, and that EN-1 can only "have effect" if there is a demonstrable need, which ESC considers is not the case for the Sea Link project.	The Applicant can confirm that this interpretation of the needs case for the Proposed Project is not correct. The needs case for the Proposed Project is set out in several application documents, primarily **Application Document 7.2 Strategic Options Back Check Report [APP-320]**, **Application Document 7.1 (D) Planning Statement [REP6-054]** and **Application Document 7.3 Design Development Report [APP-321]**. It is more recently set out in **Application Document 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142]**. The view that: 'the need case is predicated on the Sizewell Generation Group' is wrong, and does not accurately reflect the Applicant's submissions on need. The Proposed Project is required to address needs drivers across both the East Anglia and South East, and the Proposed Project will simultaneously resolve distinct issues on different parts of the network, which may take effect in either region at different times. Nor does the Applicant accept that the Proposed Project should be delayed. Such is the urgency to deliver the Proposed Project that the National Electricity System Operator (NESO) Clean Power 2030 report identifies the 2030 delivery of the Proposed Project (alongside the separate Norwich to Tilbury overhead line project) as being critical to delivering a network which supports clean power pathways. The Applicant does not agree that is has not responded to the points of ESC in relation to need, as a response on need was set out at **2GEN2** of **Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106]**. Without revisiting the conclusions of that document: • The need for the Proposed Project is not based solely or indeed principally upon the Clean Power 2030 Report. • In any case the conclusions of that Report remain valid and robust. • Paragraph 3.3.75 of NPS EN-1 actually sets out the national policy tests for assessing the need for projects to reinforce the electricity network such as the Proposed Project.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			ESC objects to this project given the impacts it will introduce on local communities, whether alone or cumulatively with other projects. Should the Secretary of State grant consent for the project, in light of the concerns raised, ESC will expect compensation to be agreed with the Applicant to offset the impacts and disruption introduced.		

Table 3.2 Landfall

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.2.1	**N/A**	Depth of cable burial at the Suffolk landfall	See Section 6.1.4 of ESC's LIR [REP1-128] for initial context. One of ESC's fundamental concerns is to ensure that there is no risk of cable exposure, over the lifetime of the project, and beyond *if* the cables remain in situ. As discussed at ISH3, ESC would welcome the Applicant reviewing the drafting of the DCO/REAC to secure a minimum depth of burial. ESC has provided wording for a DCO Requirement to secure the submission of a landfall construction method statement and landfall monitoring plan to ESC for approval post-consent in response to ExQ2 Question 2GEN17. [REP5-189]. Whilst ESC has noted its preference for the Applicant to prepare an outline landfall construction method statement, and an outline landfall monitoring plan *during* this Examination, it is acknowledged that this is now unlikely given the stage of Examination. ESC therefore suggests the following Requirement wording: *'(1) No part of Work No. 6 may commence until the following have been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body and, in respect of sub-paragraph (a) and to the extent that it relates to works seaward of mean high water springs, the Marine Management Organisation—* *(a) a landfall construction method statement for the construction of that part of Work No. 6. This must secure use of the specific trenchless landfall technique and include the final proposed profiles for the trenchless cable burial, demonstrating a minimum cable burial depth of 25m below the contemporary foreshore elevation; and*	The SMP policy for Thorpeness Haven Beach is for 'Managed Realignment' from 2005 to 2105 with the current alignment maintained at existing defences from 2005 to 2055. Current NCERM projections (2025) for an undefended coastline are for erosion of 118 m by 2105 for a location 1.7 km to north of landfall. This is based on the maximum extent of erosion risk area under an extreme climate change scenario and is therefore considered to represent a worst-case scenario at the location of the landfall. Recent coastal monitoring data has shown that there was a period of rapid erosion from 1991 to 2014 of between 10-20 m which in more recent years (2016-2021) has reduced to around 0.1 m/yr. ESC have made reference to a 6 m reduction in beach levels following recent storm events which is much larger than the maximum range of variation of approx. 2.5 m found over the period 1997 to 2023 at the coastal monitoring profile (S040) closest to the landfall location. The Applicant has undertaken further analysis including more recent monitoring data up to 2024 which is consistent with the Applicant's previous findings and does not therefore support the 6m lowering of beach levels at a fixed location. Analysis of the depth of closure at the landfall site (the depth below which waves no longer have an influence on sediment processes in the littoral zone) suggests this to be between –6 and –7 m LAT. If the shingle ridge were to retreat landwards, this level would remain the same and has therefore been used to inform a minimum depth of cable burial required to prevent exposure in the future. Even allowing for uncertainty in future projections, the extent of erosion required to expose cables buried below a level of –9 m LAT (i.e. -7 m LAT with a 2 m 'buffer', is considered highly unlikely to occur. The Coralline Crag formation is also found at a similar elevation (-6 m LAT to –7 m LAT) which is resistant to erosion and provides an additional factor of safety	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			(b) a landfall monitoring plan which commits to systematic topographic surveys to ascertain whether any coastal geomorphological change is taking place, that could ultimately risk cable exposure if unmitigated. *(2) The landfall construction method statement and the landfall monitoring plan must be implemented as approved.* *(3) In the event that inspections carried out in accordance with the landfall monitoring plan indicate that, as a result of the rate and extent of landfall erosion, Work No. 6 could become exposed during the operation of the authorised project, the undertaker must, as soon as practicable, submit proposals in writing for remedial works or mitigation measures to protect Work No. 6 from coastal retreat, together with a timetable for their implementation, to the relevant planning authority for approval in consultation with the relevant statutory nature conservation body. The remedial works or mitigation measures must be implemented as approved.'* Following discussions with the Applicant on 16th April 2026, ESC now understands that the Applicant's preferred landfall installation method is to use HDD, but at a minimum depth of 12m beneath the foreshore, shallower than the 19m – 25m indicated on the conceptual landfall design drawing in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321] page 99. Notwithstanding ESC's requests for a minimum cable burial depth of 25m, ESC cannot see that this minimum depth of 12m is secured anywhere in the DCO or REAC. The Applicant has said there will not be an update of the conceptual design profile before the end of examination ESC considers that the shoreline is more dynamic than the Applicant has assessed and has empirical evidence of unprecedented coastal erosion adjacent to the cable landfall site at Thorpeness and therefore adopts a precautionary approach. ESC has used the Anglian Coastal Monitoring Programme's topographic data records to calculate a plausible 'worst-case scenario' of beach loss over the Project's lifespan. If 5m of vertical beach lowering occurred during an erosion event (as is evidenced historically) and this happened several times during the project's 40-60 year lifespan, with poor beach recovery in the interim, then a 25m DOL could still afford adequate future coverage below the transgressive foreshore, that *should* not pose a future health and safety risk, or impede natural coastal processes. ESC also requires the Applicant to provide details of the mitigation measures for the eventuality that cables are exposed on the foreshore, in the Outline Offshore Construction Environmental Management Plan during the course of the Examination. Whilst further detail can be approved post-consent through a discharge	by limiting vertical erosion of mobile beach material and protecting the cable from exposure. Due to uncertainties involved in the prediction of coastal processes and their response to future climate change, the Applicant has provided a commitment (MPE06) to undertake monitoring and analysis of intertidal and subtidal profiles on an annual basis. This will identify future coastal erosion rates which could be affected by a deterioration of the Coralline Crag (or other subtidal features), climate change effects that are more severe than predicted or changes to the management policy for Aldeburgh and adjacent sections of coastline. At Deadline 7, the Applicant has submitted the following REAC commitments: "*Over the operational lifetime of the Proposed Project, monitoring of the beach profile and erosion rates will be carried out at both the Suffolk and Kent landfall sites in relation to the trenchless technique construction areas associated with the exit pits. The frequency and scope of monitoring would be dependent on the pre-construction surveys and 'as-built' status of the Offshore Scheme. The Applicant will produce a monitoring plan, in substantial accordance with the outline In-Principle Monitoring Plan to be submitted to the MMO to cover works below Mean High Water Springs within three months of the 'as-built survey' unless otherwise agreed in writing by the MMO.* *At the Suffolk landfall, where a trenchless landfall construction technique is employed, the Applicant commits to ensuring that the drilled alignment achieves a minimum depth defined as follows:* *For the length of landfall installed between the western boundary of the RSPB North Warren Reserve and the western boundary of The Haven Local Nature Reserve, the minimum depth of the trenchless landfall shall be 12 metres below existing ground level.* *For the length of landfall installed beneath The Haven Local Nature Reserve, the trenchless landfall shall be below elevation -10.5m OD.* *The specification of these minimum depths is such that the trenchless works remain at sufficient depth beneath sensitive designated land and the dynamic coastal zone to provide a conservative margin against reasonable worst case future coastal change and erosion over the lifetime of the Proposed Project."*	

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			of Requirement 6 of the draft DCO, it is essential that an adequate proposal is provided at this stage to reassure ESC and other stakeholders that instances of cable exposure will be appropriately managed. The Shoreline Management Plan policy in (Unit 14.2 Thorpeness Haven Beach) is 'Managed Realignment' to 2105. The intent here is for a natural shoreline, not to encourage new defences. ESC therefore considers that the only viable mitigation measure would be to rebury the cable. Enough "slack" in the cable is therefore required to allow it to be reburied at a lower level. If the existing beach material is severely depleted, a recharge *may* be appropriate.		
3.2.2	**N/A**	Final HDD profiles to be approved	ESC also expects the Applicant to share the Final Horizontal Directional Drilling (HDD) proposed profiles with ESC (as the Coastal Risk Management Authority under the Coast Protection Act 1949 and Flood and Water Management Act 2010). Whilst ESC has previously advised that this can be submitted for approval as part of the approval of the Offshore and Onshore CEMPs through a discharge of Requirement 6, in response to ExQ2 Question 1GEN17 submitted at Deadline 5, ESC has now proposed wording for a new Requirement (above), with the final HDD proposed profiles able to be approved by the relevant planning authority via approval of a landfall construction method statement. Whilst ESC acknowledges that the Applicant has updated Condition 4 of the dML to include a requirement for a landfall method statement to be submitted to and approved by the MMO, notwithstanding ESC's preference for a landfall construction method statement to be secured via a DCO Requirement, ESC requests that it, as the relevant coastal erosion risk management authority, is also included as a consultee for this dML condition, insofar as is relevant for its administrative area. ESC's planning jurisdiction extends to Mean Low Water, hence there is an overlap of consenting authority with the MMO, with whom ESC is consulted in partnership on planning applications that span East Suffolk's foreshore (e.g Sizewell C, EA1N and 2) *and* nearshore zone, since construction activities that take place in the latter could impact the former.	The Applicant confirms that Condition 4 of the dML was updated at Deadline 6 to include the following: "*A landfall method statement in accordance with the construction methods assessed in the environmental statement.*" The plans listed in Condition 4 of the dML requires MMO approval as the Competent Authority for the subtidal environment prior to construction. This method would form part of the Cable Specification and Installation Plan. Commitment B59 was updated in the REAC (see **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 for the latest version) and states that: In relation to trenchless landfall works at both Suffolk, the contractor(s) will prepare the following suite of plans: • HDD Landfall Method Statement and Drilling Fluid Management Plan, in consultation with NE, Royal Society for the Protection of Birds (RSPB) and East Suffolk Council (ESC) and submit the same for approval by the Marine Management Organisation (MMO) in accordance with the Cable Specification and Installation Plan prior to the commencement of any HDD activities. • Undertake HDD landfall hydrofracture modelling which is to be shared for information only with NE, RSPB and ESC when completed. Natural England and ESC will be notified of changes to landfall HDD depth or changes to the location of the landfall exit pits.	Not agreed
3.2.3	**Application Document 9.140 (B) Outline In Principle Monitoring Plan** submitted at Deadline 7	Post-installation landfall survey reports	ESC considers it, along with other relevant stakeholders, must be given sight of post-installation landfall survey reports of the HVDC link, from exit pit to the transition joint bay (TJB). Other energy infrastructure projects share this information with ESC as part of the consented monitoring plan. ESC's Coastal Management Team would take a keen interest in the ultimate depth of cable burial beneath nearshore, foreshore and	Requirement 16 of the DCO and Condition 10 of the deemed Marine License (dML) already secure Trenchless Techniques at both Landfalls. The Applicant therefore considers this point to be agreed and closed. The Applicant confirms that an Outline In Principle Monitoring Plan for the Offshore Scheme has already been submitted into Examination at Deadline 6 (see **Application Document 9.140 (B) Outline In Principle Monitoring Plan** submitted at Deadline 7 for the latest version). This	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			backshore. ESC would expect the surveys to show the cable buried at the depth proposed on the design drawings in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]. This should be a formal requirement within the DCO. ESC's proposed wording for a Requirement securing the use of a trenchless landfall technique, provided in response to ExQ2 Question 2GEN17, also requires that a landfall monitoring plan is submitted to and approved by the relevant planning authority. ESC considers that the sharing of post-installation survey reports with relevant stakeholders, including ESC, could be secured through the outline landfall monitoring plan, the detailed version of which would be approved through the discharge of ESC's proposed Requirement.	document is secured within Condition 4 of the dML and the final monitoring plan requires MMO approval as the competent authority for the subtidal environment prior to construction. The Applicant would re-iterate that in Suffolk, all works seaward of Mean High Water Springs associated with the Offshore Scheme are located within the subtidal environment. The Applicant has however committed in the REAC to the following with regards to the Offshore Scheme: • ***MPE06 (updated commitment at D7):*** *"Over the operational lifetime of the Proposed Project, monitoring of the beach profile and erosion rates will be carried out at both the Suffolk and Kent landfall sites in relation to the trenchless technique construction areas associated with the exit pits. The frequency and scope of monitoring would be dependent on the outcomes of the pre-construction surveys and 'as-built' status of the Offshore Scheme. The Applicant will produce a monitoring plan, in substantial accordance with the outline In-Principle Monitoring Plan to be submitted to the MMO to cover works below Mean High Water Springs within three months of the 'as-built survey' unless otherwise agreed in writing by the MMO."* • ***B59:*** *Suffolk Landfall:* ○ *"HDD Landfall Method Statement and Drilling Fluid Management Plan, in consultation with NE, Royal Society for the Protection of Birds (RSPB) and East Suffolk Council (ESC) and submit the same for approval by the Marine Management Organisation (MMO) in accordance with the Cable Specification and Installation Plan prior to the commencement of any HDD activities.* ○ *Undertake HDD landfall hydrofracture modelling which is to be shared for information only with NE, RSPB and ESC when completed."* • ***MPE14 (new commitment at D7): "****At the Suffolk landfall, where a trenchless landfall construction technique is employed, the Applicant commits to ensuring that the drilled alignment achieves a minimum depth defined as follows:* ○ *For the length of landfall installed between the western boundary of the RSPB North Warren Reserve and the western boundary of The Haven Local Nature Reserve, the minimum depth of the trenchless landfall shall be 12 metres below existing ground level* ○ *For the length of landfall installed beneath The Haven Local Nature Reserve, the trenchless landfall shall be below elevation -10.5 m OD.*	

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
				The specification of these minimum depths is such that the trenchless works remain at sufficient depth beneath sensitive designated land and the dynamic coastal zone to provide a conservative margin against reasonable worst case future coastal change and erosion over the lifetime of the Proposed Project." The Applicant therefore disagrees that an additional Requirement is needed to secure ESC's interests. As per Condition 14 of the dML, "*The undertaker must submit to the MMO and Trinity House within three months of completion of the licensed activities forming part of Work No.6 or any part of those activities under Work No.6 an 'as built' plan*."	
3.2.4	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Risk of frac-out	See Section 6.1.7 of ESC's LIR [REP1-128]. ESC was largely satisfied with changes made to the REAC [REP4-325] to address the risk of frac-out, and welcomes further changes at Deadline 6 [REP6-078] to mitigation measure B59 to include ESC, alongside Natural England, as a stakeholder to receive copies of plans/notifications in relation to the trenchless landfall works. ESC understands from discussions with the Applicant that the Applicant's intention for the depth of HDD drilling to be 19-25m beneath the foreshore area (as shown in Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]) is driven by a need to minimise frac-out risk within the sensitive SSSI coastal hinterland. However, ESC notes that this minimum burial depth is not secured in the DCO, and during the Coastal Environment thematic meeting with the Applicant (16/04/2026), a much shallower (12m) minimum depth of burial was introduced by the Applicant as its current preference, and this would not preclude the risk of frac-out. ESC therefore requests that the Applicant commits to a minimum cable burial depth of 25m (as noted earlier in this SoCG) in the DCO/REAC, at the very least in the event that HDD is the chosen trenchless installation method, in order to satisfy ESC that the risk of frac-out is being adequately addressed.	Commitment B59 was updated in the REAC (see **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 for the latest version) and states that: In relation to trenchless landfall works at both Suffolk, the contractor(s) will prepare the following suite of plans: • HDD Landfall Method Statement and Drilling Fluid Management Plan, in consultation with NE, Royal Society for the Protection of Birds (RSPB) and East Suffolk Council (ESC) and submit the same for approval by the Marine Management Organisation (MMO) in accordance with the Cable Specification and Installation Plan prior to the commencement of any HDD activities. • Undertake HDD landfall hydrofracture modelling which is to be shared for information only with NE, RSPB and ESC when completed. Natural England and ESC will be notified of changes to landfall HDD depth or changes to the location of the landfall exit pits. It should be noted that the minimum depth is not the design depth. The rationale for a minimum depth for the landfall, at the request of ESC, is to ensure that the installed cable is well below the level of any future coastal erosion during the operational life of the cable. The risk of frac-out is precluded by the depth of the final design. The design depth will be determined by consideration of ground conditions that are suitable for the method, and a factor of safety against frac out determined by hydrofracture modelling. The key inputs for the hydrofracture modelling are the ground strength and the drilling or boring equipment parameters. For the planned HDD methodology, the design depth is likely to be similar to that shown in **Application Document 3.1 Design Development Report [APP-321]**. However, in the unlikely event that the methodology changes to Direct Pipe, the design could be safely bored just below the minimum depth (12m depth or –10.5m elevation) with no-frac out risk. This is because the fluid pressure in Direct Pipe installations is only marginally higher	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
				than surrounding groundwater pressures, allowing them to be installed at only a few metres below the surface.	
3.2.5	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7	Access to the landfall	See Section 6.1.3 of ESC's LIR [REP1-128] Whilst ESC defers highway and traffic matters to SCC as the Local Highways Authority, ESC requires comprehensive information to be provided in relation to access to the landfall area between Aldeburgh and Thorpeness. Consideration must also be given to potential impacts on the tourism industry resulting from landfall access and associated activities. Given that the Sea Link project proposes a landfall directly adjacent to the B1122, ESC recommends that NGET revisits the constraints pertaining to the proposed use of narrow roads, as highlighted in the SPR examinations, and limits HGV movements as far as practicable, putting the lessons learned from the SPR projects into practice for Sea Link. ESC expects such controls to be contained within the Construction Traffic Management and Travel Plan (CTMTP). The Applicant has stated in its comments on ESC's LIR [REP2-027] that construction traffic through Aldeburgh will be limited to 10 HGVs daily. ESC previously requested that this commitment is cemented in the CTMTP, and ESC understands this has been actioned at Deadline 6 [REP6-062]. Whilst the addition of this HGV cap is welcomed by ESC, ESC defers to SCC as the Local Highways Authority for broader landfall access issues, noting ESC's concern regarding the impacts of this access on the local community and tourism.	Following further consultation with SCC Highways and Aldeburgh Town Council in March/ April 2026, a daily cap of ten HGV movements will be imposed at the A1094 Leiston Road Roundabout within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with construction works at S-BM01 and S-BM02). **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes this. The Applicant considers that this resolves the issue but accepts that ESC defer to SCC on this as it is a highway matter.	Deferred to SCC as a highways matter

Table 3.3 Saxmundham Converter Station and River Fromus Crossing

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.3.1	**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]** **Application Document Local impact**	Heritage impacts – general	See Section 6.3.6 of ESC's LIR [REP1-128]. Whilst ESC appreciates the need for compliance with the Water Framework Directive, ESC requires that the scale of the bridge is minimised to mitigate impacts introduced on nearby heritage assets. ESC understands the Environment Agency is *'willing to accept a 4m soffit height [above the Q95 flow level], subject to the inclusion of a monitoring and contingency plan'*. The Applicant has subsequently amended Requirement 3 (Detailed Design) of the draft DCO at Deadline 5 such that it now states that *'the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow*	The Applicant takes the view that the scale of the bridge has been minimised as far as possible consistent with the need to achieve Water Framework Directive (WFD) compliance. The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]**. This includes a worst-case assessment of a bridge option for the Fromus Crossing which would be at a height of up to 6 m (from the ground level at	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	reports (LIR) from any local authorities [REP1-128]		*level)'*. ESC notes that this secures a *minimum* soffit height of 4m above the Q95 flow level, but not a *maximum* soffit height of 4m above the Q95 flow level. Whilst the Applicant is required to submit a technical statement demonstrating how it has sought to reduce the scale of the bridge, without a secured maximum soffit height, ESC remains concerned about the heritage impacts of a larger bridge. The height of the bridge will affect the visual impact of the bridge and retaining walls, as well as the size of the required ramps and bunding. The residual visual impact of the bridge itself will be limited following the establishment of the landscape mitigation planting; however, the scale and height of the new landscaping will differ depending on the required ground levels around the bridge. This landscaping and the changes to the ground levels are unrelated to the historic form and layout of the former parkland to Hurts Hall and will be intrusive in views toward Hurts Hall. They will also (to a lesser extent) be intrusive in the landscape setting to Saxmundham Conservation Area. Regardless of the height of the bridge, this part of the development is considered to detract from the setting of the Grade II Hurts Hall and from the setting of the Saxmundham Conservation Area. Therefore, ESC considers that, irrespective of the final height of the bridge, there will be a significant adverse effect to be carried forward into the planning balance. ESC considers view this aspect of the scheme to be unacceptable.	the abutment to the top of the parapet) with 62 m long approach ramps. The worst-case assessment of impact to Hurts Hall concludes that the effects would be moderate adverse at Year 1 of Operation and minor adverse at Year 15 of Operation. ESC have stated a disagreement with the Year 15 assessment and this is discussed in the following matter. The worst-case assessment of impact to Saxmundham Conservation Area concludes that the effects would be moderate adverse at Year 1 of Operation and minor adverse at Year 15 of Operation. ESC's LIR (**Application Document Local impact reports (LIR) from any local authorities [REP1-128]** from East Suffolk Council) confirmed agreement with this assessment.	
3.3.2	**Application Document 6.4.2.1 (B) ES Figures Suffolk Landscape and Visual Part 1 of 7** submitted at Deadline 7 **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**	Impacts on designated heritage assets	See Section 6.3.6 of ESC's LIR [REP1-128]. ESC considers the landscape planting proposed to mitigate the harm to Hurts Hall would not reduce the magnitude of the adverse impact, and so the residual effect would be moderate adverse (significant). ESC also considers there would be a moderate adverse (significant) effect on Hill Farmhouse. This is a matter of professional disagreement and an agreement is unlikely to be reached. ESC considers that the assessment of heritage impacts on Hurts Hall and Hill Farmhouse should take into account the Landscape Viewpoints – particularly Updated Landscape Viewpoint 2 [REP1-298] and Additional River Fromus Viewpoint B [REP1-300] for Hurts Hall, and Landscape Viewpoint 5 [APP-209] for Hill Farmhouse. In relation to the Applicant's comment at Section 6.3.6.10 of [REP2-027], ESC does not disagree with the statement that the Cultural Heritage Viewpoints are most relevant to the heritage assessment. However, ESC remains of the view that the Landscape Viewpoints are also important, as they demonstrate that Hurts Hall is widely visible in the surrounding area, which is an aspect of its setting that	The disagreement on the degree of impact at Hurts Hall at Year 15 of operation and at Hill Farmhouse is a disagreement in professional judgment and it was acknowledged in ISH3 that an agreement is unlikely to be reached between the Applicant and ESC on these matters. Hurts Hall A representative view towards the Grade II listed Hurts Hall from the B1121 to the southwest of the asset was subject to summer and winter photography and photomontages were created to demonstrate the appearance of the view at different stages of the site development and to demonstrate different options under consideration for the bridge design. These are provided in **Application Document 6.4.2.1 ES (B) Figures Suffolk Landscape and Visual Part 1 of 7** submitted at Deadline 7 and **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**. These detail the summer and winter baseline situation, the situation following removal of vegetation and introduction of the Fromus Crossing bridge (two options), and the situation at Year 15 of operation when screening	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	Application Document 9.48 River Fromus Visualisations Part 1 of 3 [REP1-298; REP1-299; REP1-300] **Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [PRE4-086]**. **Application Document 6.2.2.3 (B) Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]** **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** **Application Document 6.4.2.3 ES Figures**		contributes to its significance and it would be misleading to attempt to downgrade the importance of these views. ESC has reviewed the Applicant's comments on its LIR [REP2-027] and strongly disagrees with the statement at Section 6.3.6.9 that "*views of the asset [Hill Farmhouse] in the surrounding landscape are not a feature of its setting that contributes to significance*". As a historic farmhouse, the rural agricultural setting of the listed building contributes to the historic interest of the building, and the development will, if permitted, undoubtedly detract from this setting. Plate A.1 in Appendix 1 to the Applicant's comments [REP2-027] demonstrates the issue clearly as it shows that the trees to the north of Hill Farmhouse are not a dense woodland, especially in winter. ESC notes that additional visualisations have been provided [REP4-086] which show illustrative models of the Saxmundham Converter Station within the maximum parameter blocks represented by the Rochdale Envelope. ESC has made its assessment of the impact on designated heritage assets on the basis of the maximum parameters (the worst-case scenario) of the converter station, as the visualisations are only illustrative and not definitive at this stage. If the height, footprint and layout of the converter station had been definitively agreed to be as shown on the illustrative model, then the visual impact on the setting of Hill Farmhouse could be assessed against these new details, which could lead to a lower assessment of harm.	planting has matured. These photomontages demonstrate that the proposed screening planting for the bridge, access and Saxmundham Converter Station does not obscure this view of the asset. Further visualisations have been provided during DCO Examination (**Application Document 9.48 River Fromus Visualisations Part 1 of 3 [REP1-298; REP1-299; REP1-300]**) that demonstrate different viewpoints in the vicinity of Hurts Hall and illustrative viewpoints of a design option for the Fromus bridge design and Saxmundham Converter Station design that show how with sensitive design and mitigation planting the impact of both features can be reduced. Cumulative visualisations towards Hurts Hall from the B1121 showing maximum extents and illustrative extents for Saxmundham Converter Station and LionLink Converter Station in combination have also been submitted at Deadline 4 in Appendix A to **Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [PRE4-086]**. The reduction in the residual significance of effect reported in Section 3.11 of **Application Document 6.2.2.3 (B) Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]** in relation to Hurts Hall as a result of the maturation of screening vegetation at Year 15 of Operation is mainly related to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the asset's setting. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in the residual minor adverse significance of effect assessed at Hurts Hall. Hill Farmhouse The assessment of Hill Farmhouse presented in Paragraph 3.9.117 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]** include robust consideration of the degree to which the surrounding agricultural landscape contributes to the significance of the asset and the degree to which it is sensitive to visual intrusion resulting from the Proposed Project. It highlights the enclosed nature of the asset's setting, being largely screened from view due to the boundary planting in its immediate curtilage. Views of the asset in the surrounding landscape are not a feature of its setting that contributes to significance. Viewpoint CH3 in **Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]** is taken from the south of the asset looking north towards the proposed Saxmundham Converter Station. This demonstrates both the asset's lack of visibly and the lack of	

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	Suffolk Cultural Heritage Part 2 of 2 [APP-230]			visibility of the Proposed Project which would sit behind it in the view. Cumulative illustrative visualisations at Viewpoint 5 have been produced in Appendix A of the **Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. These illustrate the maximum parameters of the Suffolk Onshore Scheme and LionLink in the vicinity of Hill Farmhouse. 'Viewpoint 5 Heritage' also extends the view in the formal visualisation west to include the farmhouse. The visualisations also show reasonable illustrative models of both schemes in the same view, which are significantly smaller than the maximum parameters. This demonstrates how the Saxmundham Converter Station, shown illustratively in dark green, can integrate into the view, appearing as further agricultural buildings of the same form as the existing modern units. The summer and winter photography provided also demonstrates how the farmhouse is entirely screened by vegetation in the view in the summer.	
3.3.3	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan- Suffolk** submitted at Deadline 7 **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** **Application Document 9.35.2**	Landscape planting	See Section 6.3.8 of ESC's LIR [REP1-128], and Agenda Item 9.5 of ESC's ISH2 post-hearing submission [REP4-117]. Particularly important will be the adoption of an adaptive landscape maintenance programme which will ensure that all new planting receives the full required programme of maintenance, regardless of how long it takes for the plants to successfully establish. ESC acknowledges that a commitment to adaptive management has been included in the Outline Landscape and Ecological Management Plan (OLEMP) [REP4-065], with further details to be approved in the final LEMP through a discharge of Requirement 6 of the dDCO. ESC will expect that, as part of this programme, where trees must be replaced due to failed establishment, the clock will reset and the committed maintenance period will also apply to the new planting. ESC acknowledges the addition of paragraph 7.3.5 to the OLEMP at Deadline 6 [REP6-078], which secures the 'pausing' of establishment maintenance periods to be agreed with the local planning authority. Whilst this is welcomed by ESC, ESC continues to request amendments to Requirement 6 of the draft DCO to secure this, which is the correct and appropriate way to resolve this issue, with proposed wording provided in Table 3.12 below.	Additional wording on Adaptive Management was provided at Deadline 6 as part of wider updates to the oLEMP (see **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan- Suffolk** submitted at Deadline 7 for the latest version). This reflects the potential for the management period to be 'paused' or 'accelerated' for particular planting as agreed with the local planning authority, potentially increasing the management period timeframe. The Applicant has amended Requirement 6 of the draft DCO as far as is considered appropriate.	Not agreed
			ESC will also expect the Applicant to undertake early planting around the converter station site at Saxmundham ahead of construction commencing. ESC notes that the Applicant has amended the OLEMP so that it no longer commits to advance planting prior to construction where planting areas do not conflict with construction compounds and activities, and instead only commits to this planting in advance of operation (Para 5.8.1 of	Advance planting as identified in the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan Suffolk** submitted at Deadline 7) will be undertaken during construction and in advance of operation. It is not a watering down by the Applicant of its previous commitments to advance planting, as the commitment remains that advance planting will be undertaken during construction where planting	Not agreed

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	Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]		[REP4-066]). ESC is extremely concerned by this as it appears to be a significant watering down by the Applicant of its previous commitments to advance planting. The Applicant's assertion that this is not a watering down of its previous commitments is clearly incorrect and rejected in that it states that *"the commitment remains that advance planting will be undertaken during construction where planting areas do not conflict with construction compounds and activities"* (see Applicant's response to ExQ3 3LVIA1 [REP6-111]); the commitment was previously made for advanced planting to take place '*prior to construction commencing'* and the Applicant has reneged on that commitment through amendments made to the OLEMP at Deadline 4. The Applicant's proposed approach is no longer in line with other projects in the District, and it fails to commit to the widely-accepted standard practice of pre-commencement planting where at all possible. ESC is not clear as to the Applicant's reasoning for its resistance to committing to pre-commencement planting. Whilst it originally stated in response to ISH2 supplementary agenda additional question ISH2.022 that *'undertaking early planting in the pre-commencement phase of the Proposed Project would not be appropriate as this could prevent essential surveys or activity that the contractor will need to carry out prior to construction'*, it has since stated in response to ExQ3 3LVIA1 that it is the criticality of the programme and the delays that would be created by an approval process that are the issue. If it is the former, ESC has previously stated that it considers that the caveat *'where planting areas do not conflict with construction compounds and activities'* should provide adequate safeguards against any instances of pre-commencement planting interfering with works (noting that the Applicant failed to adequately address this point, in ESC's view, in response to ExQ3 3LVIA1). If it is the latter, ESC does not accept this as an adequate justification, noting that, for East Anglia ONE North and East Anglia TWO, 'early planting of landscape works' was included in the list of pre-commencement 'onshore preparation works' for which approval of an onshore preparation works management plan was required prior to those preparation works commencing. ESC strongly supports the ExA's suggestion for advance mitigation planting to be added to pre-commencement operations in Article 2 of the dDCO, with a requirement that pre-commencement operations cannot be carried out until details of advance planting are approved with a timetable for their implementation. ESC has suggested the following Requirement wording: **Advanced planting**	areas do not conflict with construction compounds and activities. This will enable the early establishment of plants before remaining areas are planted once construction is complete. Advance planting cannot be added to the list of pre-commencement works because the Applicant cannot undertake advance planting during this period. Adding it to the list of pre-commencement works could be seen as deliberately misleading in this context. The reasons why advance planting cannot be undertaken as a pre-commencement activity are set out below. The criticality of the programme for the Proposed Project, means that the Applicant would aim for the pre-commencement period to be as short as possible. The purpose of pre-commencement works is to enable some initial, low impact operations to begin in advance of discharge of significant documents for approval, in particular, under Requirement 6. Introducing an approval into the pre-commencement period would work against a key purpose of pre-commencement works. The landscape proposals are intended to be developed holistically for each stage of the Proposed Project in the final LEMP to be discharged as part of Requirement 6. Any planting in advance of operation would be most appropriately set out and discharged as part of this document. The final LEMP will be developed and informed by detailed designs and additional survey; some of which would be carried out during the pre-commencement period.	

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			(1) No works, including pre-commencement operations, may commence until details of advanced planting have been submitted to and approved by the relevant planning authority, including a timetable for their implementation.		
			The Applicant states in its response to ESC's LIR [REP2-027] that additional planting in Area B shown on Figure 2 of ESC's LIR [REP1-128] *'would entirely enclose views along the existing Public Right of Way (PRoW) and restrict views to the wider landscape'*. ESC considers that enclosed views would be preferable to a PRoW user than a wide view of a landscape in which the converter station would be the focus, and so continues to request that the Applicant proposes additional planting in Area B. ESC notes the Applicant's proposal to plant tree belts along the B1119 to achieve enhanced screening. ESC previously advised in Paragraph 6.3.8.9 of its LIR [REP1-128] that such tree belts need to be at least 15m, if not 20m, wide to be fully effective. ESC understands from Figure 2 Saxmundham Converter Station Illustrative Cross Sections (Sheet 3 of 3) of the OLEMP submitted at Deadline 4 [REP4-065] that the tree belts are proposed to be 8.5m wide. ESC therefore considers that this is too narrow to be fully effective and remains of the view that the Applicant has missed an opportunity to increase the Order Limits south of the B1119 via Change 5 of its Change Request 1 to accommodate a wider tree belt. ESC notes that the Applicant has failed, and now missed the opportunity, to amend the Order Limits to address this, despite the obvious detrimental impact that will now be caused to the local community. This is another example of the Applicant's refusal to genuinely attempt to mitigate, and where not possible compensate, for the damage it will be causing if consent is granted.	The response regarding 'Area A' is acknowledged. The Applicant's position regarding these additional areas of mitigation planting is set out within AP39 contained in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. With regard to 'Area B', the Applicant disagrees that enclosed views would be preferable to wider views of the landscape. The Applicant queries whether ESC mean Fristonmoor Lane or another location as it is not considered that this location is related to 'Area B'. The Applicant maintains the position that additional planting along the B1119 is not necessary for essential mitigation as it is unlikely, in addition to the proposed landscape planting (hedgerow, tree planting and woodland planting), to reduce the magnitude and significance of effects on landscape and visual receptors. The widening of the Order Limits associated with Change Request 1 provided the opportunity to incorporate additional planting within the Order Limits along part of the B1119 following stakeholder requests. The 8.5 m depth of woodland planting is considered to represent an additional, strengthening of the layered vegetation network of the surrounding landscape and is comparable in width to other belts of planting in the local landscape.	Not agreed
			ESC disagrees with the Applicant's Year 15 assessment for Viewpoint 21. In Section 6.3.8.4 of its comments on ESC's LIR [REP2-027], the Applicant states that it is considered that the major adverse (significant) effect reported at Year 1 of operation would be reduced as a result of the landscape planting proposals maturing. As stated in Paragraph 7.1.4 of ESC's LIR [REP1-128], realistic anticipated growth rates for new planting in East Suffolk are an essential factor informing the Landscape and Visual Assessment. ESC maintains that erratic and unpredictable rain fall patterns can be a very limiting factor in successfully establishing new tree and shrub planting in this region. ESC considers that the Year 15 assessment for Viewpoint 21 would be major adverse, as unless the mitigation planting establishes very quickly, ESC does not consider that it will lessen the effect to moderate adverse by Year 15.	The Applicant's position remains as identified in the response to the Local Impact Report within **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]** that the Year 15 assessment would reduce to 'moderate adverse'. The matured proposed planting would screen parts and soften views towards the Proposed Project, as shown in the Illustrative Visualisation for Viewpoint 21 submitted at Deadline 6 in response to 3LVIA4. The position on this assessment was also reaffirmed within AP39 contained in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. Regarding additional mitigation planting, the Applicant's position on the provision of additional mitigation planting is set out with respect to specific viewpoints discussed within ISH2 including viewpoints 4, 5, 20 and 21 within **Application Document 9.90 (A) Applicant's**	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			For Viewpoints 4, 5, 20 and 21, ESC notes that there are limited opportunities for additional mitigation planting given the area of land available, but is strongly of the view that the Applicant could have included more land within the Order Limits to allow for planting closer to the receptor. This would have achieved enhanced screening compared to what is now proposed, namely only planting around the converter station itself. ESC notes, with regret, that the Applicant is unlikely to amend the Order Limits to address this at this stage.	**Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**.	
3.3.4	**Application Document 9.123.1 (B) Applicant's Responses to Second Written Questions [REP6-102]**	Impacts on woodland vegetation	Veteran trees along the River Fromus have been avoided. The veteran Horse Chestnut is being given a 40 m wide berth and other veteran trees near the Fromus crossing have been avoided and will be protected during construction. ESC raised concerns in response to ExQ2 2GEN14 [REP5-189] that Requirement 8 only applies to the construction phase and so would not provide any protections over the felling of veteran or ancient trees during pre-commencement. ESC understands that REAC measure A05 commits the undertaker to retain all veteran and ancient trees within or immediately adjacent to the Order Limits except where works are required due to trees posing a safety risk (noting that REAC commitment A02 commits to details being agreed in advance with the relevant local planning authority in such cases). Whilst ESC acknowledges these measures, for the avoidance of doubt, ESC would welcome changes to Article 51 of the draft DCO to make it clear that Article 51 powers do not apply to ancient and veteran trees.	The Applicant has responded to the concerns regarding Article 51 in **Application Document 9.123.1 (B) Applicant's Responses to Second Written Questions [REP6-102]**. See also **Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6** submitted at Deadline 7.	Not agreed
3.3.5	**N/A**	Design	As discussed in ESC's response to Question 1GEN47 of ExQ1 [REP3-085], ESC requires that comprehensive and detailed provision is included within the DCO, via a Requirement, to ensure that the proposed Fromus Bridge design is submitted to and approved by ESC's Design team (in consultation with relevant stakeholders such as the relevant Highways Authority) before any works on the bridge can commence. ESC, in collaboration with SCC, has proposed revised wording for Requirement 3 of the draft DCO which can be found in ESC's response to ExQ3 3GEN8 [REP6-261]. ESC notes that the Applicant has amended Requirement 3(3) (Detailed Design, Bridge over the River Fromus) of the draft DCO at Deadline 6 to read: *'Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the design of the bridge have been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency.'*	The Applicant has further amended Requirement 3(3) at Deadline 7 to specify that the 'design, layout, scale and external appearance' of the bridge are to be approved. The Applicant had intended the word 'design' to be a holistic term to mean these aspects of the bridge as the layout, scale and external appearance are part of the design. However, the wording has been amended to make this explicit in line with ESC's request in the hope this could now be agreed. The final wording of Requirement 3(3) submitted at Deadline 7 states: '*(3) Bridge over the River Fromus* *(a) Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the design, layout, scale and external appearance of the bridge have been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency and Suffolk County Council.*	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			This has removed the requirement that details of the layout and scale of the bridge have to be submitted to the relevant planning authority. Layout and scale should be reintroduced into Requirement 3(3). Given ESC's concerns (as set out in the first row of this table) that the 4m soffit height above the Q95 level is not secured as a maximum height in Requirement 3, and that ESC's control over layout and scale have been removed, whilst ESC acknowledges that the current drafting of Requirement 3 is a significant improvement on previous iterations, ESC is not wholly satisfied. ESC acknowledges that the Applicant has suggested that information submitted at Deadline 7 could address ESC's concerns but given this has not been formally submitted into the Examination at the time of writing and ESC have not been able to review it, this matter remains 'not agreed'.	*(b) The bridge over the River Fromus should be designed in accordance with the following parameters:* *(i) the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow level);* *(ii) abutments for the bridge shall be set back no less than 8m from the top of the bank; and* *(iii) the bridge shall not have a deck width greater than 6m.* *(c) The design details submitted under (a) must be accompanied by a technical statement demonstrating how, recognising the minimum size parameters in sub-paragraph (b)(i) and (ii), the Applicant has sought to reduce the scale of the bridge, having and achieve good design in accordance with paragraphs 4.7.1 to 4.7.8 of the Overarching National Policy Statement for Energy (EN-1, 2023). In achieving these aims, the Applicant will have regard to the relationship with the landscape mitigation proposals, the articulation of the spanning structure, the design of the abutment walls, and the design of the parapet railings. The technical statement will include a plan, elevation and section drawings, and 3D renders of the bridge design in key view VP02 and CH02.* *(d) Should the bridge design comprise a soffit height of less 12.49 m Above Ordnance Datum (approximately 6m above the Q95 flow level), then development of the bridge must not commence until a macro invertebrate monitoring and contingency plan has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency. The invertebrate monitoring and contingency plan must include:* *(i) The requirement to carry out Water Framework Directive compliant surveys twice yearly (spring and autumn), upstream and downstream of the Fromus crossing for a period of five years following completion of the construction of the Fromus crossing.* *(ii) Principles of the contingency monetary fund set out in (e) and criteria for when provision of the fund would be triggered.* *(e) Following receipt and review of the monitoring results under (d)(i), should the criteria in (d)(ii) be exceeded, then a contingency fund would be provided to fund measures to encourage the passage of macro invertebrates around the Fromus crossing and/or enhancement of Water Framework Directive invertebrate habitat upstream of the Fromus crossing. This would be secured via an appropriate legal agreement.* *(f) The development shall be carried out in accordance with the details approved by the relevant planning authority further to sub-paragraph (3)(a).*	

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
				The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	
3.3.6	**N/A**	Operational noise	See Section 6.3.7 of ESC's LIR [REP1-128] and Ref D5.3.06 in ESC's Deadline 5 PADSS [REP5-184] for further context. ESC requires appropriate noise rating levels to be agreed at representative noise sensitive receptors (NSRs), to form the basis of an operational noise limit requirement in the DCO. At least 5dB below background should be the target. If this is not possible then the Applicant needs to propose an operational noise rating level that is the lowest that can reasonably be achieved but with full justification as to why that is the case. ESC also requires demonstration that this limit satisfies relevant national policy in terms of significance of impact. For the avoidance of doubt, ESC considers NPS EN1 to be the relevant policy. With respect to significance of impact, a relevant LOAEL and SOAEL should be considered; all other currently consented and proposed comparable projects (EA1N, EA2, LionLink) have stated that LOAEL and SOAEL accord with BS4142 Significance criteria (>+5dB indicative of adverse effect and therefore the LOAEL, and >+10dB indicative of Significant Adverse and therefore the SOAEL). ESC considers this the appropriate test in this case, notwithstanding the aspiration for the -5dB rating level on background. Notwithstanding the above ESC require a firm and enforceable commitment to reduce the operational noise level further at detailed design stage if it is reasonably possible to do so. Furthermore, the project should demonstrate that this can or cannot be achieved with robust justification at the appropriate stage. All of the above should be provided in a suitable Operational Noise Requirement within the DCO which should also include a verification procedure and commitment to demonstrate upon operation that the operational noise limit is not being exceeded. ESC has provided its latest proposed wording for this DCO Requirement at Deadline 6 in response to ISH3 Action Point 1 [REP6-161]. ESC has reviewed the Applicant's 'Operational Noise Levels – Technical Note' [REP6-128]. Whilst ESC considers that the Applicant has considered a number of relevant matters, the technical note does not address all of ESCs concerns. ESC does not agree with the Applicant's assertion in Paragraph 1.1.2 of the Technical Note that the note *'encapsulate[s] the discussion between the parties present during the [tripartite] meeting before Deadline 6'*.	Noise limits, design principles, subsequent provision of noise assessments detailed mitigation during detailed design phases, and post construction monitoring programme were discussed during a tripartite meeting prior to Deadline 6, with measures introduced at Deadline 6 and further at Deadline 7 (given that the meeting occurred shortly before Deadline 6 so there was insufficient time for the governance required for all amendments at Deadline 6). The noise limits set out in the noise and vibration commitments in the Register of Environmental Commitments and Actions (**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7) are based on not only achieving operational noise levels below that where a significant effect would occur; this includes a noise level of 34dB at noise sensitive receptors for the converter stations (and Minster Substation) which is secured by commitment NV11; and formerly a commitment to 5dB below background noise levels. Following discussions with ESC, the Applicant has amended NV12 to provide maximum noise limits for noise sensitive receptors near Friston Substation, including 22dB for two properties and 21dB at another. The Applicant has also gone further by committing to achieving noise levels that are as 'low as reasonably possible' at noise sensitive receptors beyond the limits described above. The Applicant considers that these measures already achieve and exceeds what is necessary to mitigate adverse effects and provide secure commitments that will ensure the Applicant also reduces the noise level further at detailed design stage. Of course, the Applicant cannot reduce noise levels beyond what is reasonable possible so going further than the above is unnecessary. All commitments above are secured in Section 1 of the REAC, which is firmly secured by Requirement 5 on the draft DCO (**Application Document 3.1 (J) draft Development Consent Order (DCO)** submitted at Deadline 7), providing commitment that already meet ESC's requirements of being secure and enforceable. The Applicant disagrees that these commitments need to be in requirements to be firmly secured and considers the nature of the wording of the commitments is more appropriate for the REAC. However, to provide further reassurance to ESC that the commitments will be adhered to (although it is noted that it would be a criminal offence if they were not), the Applicant has added further wording to commitment NV07 in the **Application**	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			Firstly, the Applicant is proposing to secure operational noise controls using REAC measures, but ESC feels strongly that these should form part of a Requirement in the DCO. As previously noted, ESC has provided draft Requirement wording, most recently at Deadline 6 in response to ISH3 Action Point 1, and was under the impression following a tripartite meeting held with the Applicant and Thanet District Council on 9th April 2026 that not only was the principle of a Requirement accepted by the Applicant, but so was the substantive bulk of ESC's draft Requirement. It is therefore disappointing to see that no operational noise DCO Requirement has been forthcoming. In respect to the aim for the operational noise limit to be 5dB below background, the Applicant has up until this point, including at the tripartite meeting, maintained its intention to try to meet this aspiration. Whilst ESC accepts that, due to the low background sound levels in this area, achieving 5dB below background level is challenging, it is somewhat disheartening to see the change in language used by the Applicant in this Technical Note, where it states that a 5dB below background sound level is "far below what is reasonable to secure". The Applicant has failed to confirm and fully justify that the proposed 34 dB operational noise rating level is the lowest noise level that can currently be reasonably achieved based on the current generic design, as has been continually requested by ESC. ESC considers that the Applicant should use the method in note 1 of section 11 of BS4142 to justify its proposed operational noise limit, as has been the case for all other comparable projects – *"a) Typically, the greater this difference, the greater the magnitude of the impact.* *b) A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context.* *c) A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context.* *d) The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context."* This provides a clear and reasonable pathway to satisfy NPS EN-1 policy tests, but the Applicant in its technical note is relying	**Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 that states: *'Prior to the commencement of operation at Saxmundham Converter Station operational noise assessments shall be submitted to the local planning authority. This assessment shall demonstrate that noise levels arising from the operation of the proposed Saxmundham Converter Station have been mitigated to be as low as reasonably practicable. Should Friston Substation be constructed under the Sea Link DCO, an operational noise assessment shall also be submitted to the local planning authority prior to operation of the substation that demonstrates that noise levels arising from the operation of the substation have been mitigated to be as low as reasonably practicable. The assessments shall include details of all mitigation measures proposed.* *The proposed Saxmundham converter station shall not operate until a scheme for monitoring compliance with the noise rating levels set out in NV11 and NV12 above has been submitted to and approved by the relevant planning authority. The scheme must be based on principles set out in BS 4142:2014+A1:2019. The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142. reference method set out in Annex D to BS 4142:2014+A1:2019 shall be used in the assessment of whether tonal penalties apply.'*	

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			on other policy, such as the Planning Practice Guidance – Noise (which has mostly been withdrawn), rather than the recently updated specific National Policy Statements. The ExA and the Secretary of State should satisfy themselves that the relevant policy tests have been met and the ExA's schedule of changes to the draft DCO appears to indicate that the ExA is not satisfied with 34dB as an operational noise limit. Based on the BS4142 significance criteria which dictate that >+10dB is indicative of significant adverse effect and the fact that the worst affected receptor (R_5764) has been assessed to have a night-time background sound level of 22 dB (see Table 1.3 of [AS-119]), a 34 dB operational noise limit would be greater than the SOAEL. ESC's view is further supported by the ExA, which has stated in its schedule of changes to the draft DCO that it *'it considers that a noise limit of 32dB would be reasonable'* given the BS4142 significance criteria which dictate that >+10dB is indicative of significant adverse effect. ESC seeks only to ensure that, should the project be consented by the Secretary of State, the highest reasonable standards of protection for local residents are secured in what is accepted to be an area with very low background sound levels and a rural residential character. ESC therefore considers it essential for the Applicant to consider noise as a critical design requirement and do its absolute utmost to reduce the operational noise level further at detailed design stage, a commitment which ESC's proposed operational noise Requirement would secure. Noting, as set out above, that not all of ESC's concerns have been addressed in the Applicant's Deadline 6 Operational Noise Technical Note, ESC considers this matter is not agreed. ESC refutes the Applicant's suggestion in this SoCG (as drafted at the time of writing) that *'Noise limits, design principles, subsequent provision of noise assessments detailed mitigation during detailed design phases, and post construction monitoring programme has been agreed at Deadline 6'.*		
3.3.7 **N/A**		The use of Benhall Railway Bridge on the B1121 for access to the converter station site, including construction of an overbridge.	See Paragraph 6.3.11.12 of ESC's LIR [REP1-128]. ESC has concerns regarding the proposed use of Benhall Railway Bridge for access to the converter station site. The bridge has a weight restriction of approximately 46 tonnes, and so the Applicant has proposed to construct an overbridge for Abnormal Indivisible Load (AIL) movements. ESC defers to SCC but will expect to be fully consulted on this element on the Project considering the genuine concerns of the local community as well as the practicality.	The Applicant acknowledges that there is currently a 46 tonne (STGO 1) weight limit on the Benhall Railway Bridge, which therefore makes the bridge suitable for the vast majority of the Applicant's proposed construction traffic. The benefit of using this access for the majority of construction traffic is that it limits the impact of that traffic due to it representing the shortest distance to the primary highway network, reducing overall journey times. Only a limited number of vehicles over 46 tonnes will be required, with the contractors aware of the weight limit and able to plan the works with that access constraint in mind. There are a limited number of vehicles including piling rigs, cranes and transformer delivery vehicles that would be greater than 46 tonnes and would	Deferred to SCC's judgement

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
				need either mitigation at the Benhall Railway Bridge or use of an alternative access route. The Applicant agrees with SCC that the preferred option for access of the limited number of vehicles over 46 tonnes is to undertake remedial works to the bridge where those works are determined to be proportionate and practicable, considering the Proposed Project programme and any requirements of SCC and Network Rail that may emerge. To progress this preferred option the Applicant is working with SCC and Network Rail to undertake a structural survey of the bridge to inform the scope of the remediation works required. The survey works will now not be undertaken until post examination. An Approval In Principal (AIP) for the survey was submitted to SCC in November 2025 and the Applicant welcomes comments from SCC on the AIP received in March 2026. The above mentioned survey will also inform the mini bridge design which would be agreed with SCC should the preferred remedial option not be required. A working area plan of the mini bridge option has been provided at Deadline 6 to provide further details on this option. The Applicant has confirmed that should the mini bridge option be adopted, then a maximum of 15 separate installations over the construction period would be required. The Applicant's Traffic Co-ordinator will liaise with SCC, other developers and Suffolk Constabulary on the timing of these installations and the associated B1121 road closures to minimise impacts. The Applicant has also included an access route for vehicles over 46 tonnes that would leave the A12 at the Yoxford roundabout, and use the B1122 through Leiston to access the Applicant's proposed haul road from BM04. This route is part of the confirmed AIL access route to be used by SPR under the DCO consent for EA1N and EA2 windfarms. SCC have raised concerns over structures on the A12 and along the SPR proposed AIL route that require assessment. It is noted that SPR and SZC are undertaking structural surveys along their AIL routes post consent which is normal practice for NSIP projects. The Applicant plans to undertake these assessments post consent as well, when the loadings have been determined following detailed design and closer to the time of proposed use to allow for any changes in the structural condition of the structures which SCC have highlighted can change at any point.	

Table 3.4 Land for mitigation

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.4.1	**N/A**	Reductions applied to the proposed order limits over the pre-application stage	See Paragraph 6.3.8.9 of ESC's LIR [REP1-128]. ESC has raised concerns about the size of the Order Limits to the north of the converter station site and whether they are sufficiently sized to accommodate the necessary mitigation planting along the B1119. ESC previously noted in Paragraph 6.3.8.9 of its LIR [REP1-128] that tree belts need to be at least 15m, if not 20m, wide to be fully effective, but Figure 2 Saxmundham Converter Station Illustrative Cross Sections (Sheet 3 of 3) of the OLEMP submitted at Deadline 4 [REP4-065] shows that the tree belt along the B1119 is proposed to be only 8.5m wide. ESC considers this to be further evidence that the Applicant has missed an opportunity to expand the Order Limits in this area to accommodate enhanced tree planting. This is a point that has been raised on numerous occasions by ESC but has been ignored by the Applicant.	The Applicant maintains the position that the additional planting requested by ESC, along the B1119 is not necessary for essential mitigation as it is unlikely, in addition to the proposed landscape planting (hedgerow and trees along the B1119 and woodland around the Converter Station), to reduce the magnitude and significance of effects on landscape and visual receptors. The widening of the Order Limits associated with Change Request 1 provided the opportunity to incorporate additional planting within the Order Limits along part of the B1119 following stakeholder requests. The 8.5 m depth of woodland planting is considered to represent an additional strengthening of the layered vegetation network of the surrounding landscape and is comparable in width to other belts of planting in the local landscape.	Not agreed

Table 3.5 Construction Working Hours

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.5.1	**Application Document 7.5.3 (E) Outline Construction Environmental Management Plan** submitted at Deadline 7 **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Core working hours	See Section 7.4.2 of ESC's LIR [REP1-128]. The proposed 7 days a week working are considered unacceptable by ESC. This is due to significant concerns regarding the lack of respite impacting local residents' mental health and wellbeing (particularly given the number of projects in the District), impacts on socio-economic activity and East Suffolk's tourism industry, and noise and vibration impacts in a noise sensitive area. ESC rejects the Applicant's suggestion in its comments on ESC's LIR [REP2-027] that the identification of Sea Link as critical for the achievement of the Clean Power 2030 target justifies the unacceptable disruption and lack of respite for East Suffolk's communities that would be caused by the proposed working hours. ESC considers that the Applicant's core working hours, as currently proposed, fail to adequately *'mitigate and minimise'* the adverse health and wellbeing effects of project construction in line with national policy (NPS EN-1). Reduced core working hours are an exceptionally important mitigation measure in helping to satisfy Paragraph 5.12.17 of NPS EN-1.	The core working hours and the exceptions proposed are required in order to facilitate the delivery of this critical nationally important electricity transmission infrastructure. The Applicant have aligned working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation at Friston Kiln Lane and associated overhead line works) set out in **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7 with the working hours secured in the SPR East Anglia One (North) and East Anglia Two DCOs. There are robust controls in management documents including in **Application Document 7.5.3 (E) Outline Construction Environmental Management Plan** submitted at Deadline 7 and **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 that mitigate the effects of construction activity, and there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends in any case. These measures, combined with the removal of bank holiday weekends for work No 3B, support the position that the proposed core working hours	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			In addition, operations allowed outside the core working hours as proposed in the draft Requirements of the DCO are too wide in scope as they effectively allow working to continue outside core working hours, and could have impacts in terms of noise and vibration, dust, light and other environmental impacts. The Applicant suggests that the list of exceptions to working hours in the DCO is comparable to those for EA1N and EA2 [REP2-027]. ESC disagrees and maintains its view that the scope of exceptions to the core working hours is too broad in the Sea Link draft DCO. ESC has been consistently requesting further justification for each of the individual exceptions, but the Applicant has failed to provide this. Whilst ESC acknowledges that the Applicant has now excluded Bank Holidays from its core working hours for the Suffolk converter station (Work No. 3B), this does not go far enough. ESC requires Saturday afternoons, Sundays and Bank Holidays to be removed from the core working hours for all works other than those listed in Paragraph (4) of Requirement 7 (notwithstanding ESC's view that the scope of this paragraph is too wide). This would align with the working hours previously examined and agreed for other associated and consented NSIPs, namely SPR's EA1N/EA2 consents. Operations outside of core working hours must be restricted unless otherwise approved by ESC as responsible local planning authority. ESC notes that other NSIPs in East Suffolk have mechanisms to request working outside of permitted hours. ESC will support this where the need has been justified. ESC would suggest a similar mechanism be employed in the case of Sea Link. Justification of working in these circumstances is a vital step in determining Best Practicable Means, in that it should always be a case that intrusive works can only take place at that time and cannot reasonably be undertaken at a less sensitive time. ESC does not consider the Applicant's justification for not pursuing this approach in its comments on ESC's LIR [REP2-027] satisfactory. ESC has proposed, following discussions with the other Councils, revised wording for Requirement 7 in response to ISH3 Action Point 1 [REP6-161]. ESC is also requesting further justification for each of the individual exceptions, which it considers has not yet been adequately provided by the Applicant. Therefore, whilst the list of exceptions proposed by the Applicant has been retained in ESC's suggested Requirement wording below, ESC will require justification for the extent of these exceptions, and ESC reserves the right to amend its suggested wording in light of any justification which might be provided.	(including weekends where necessary) are reasonable and justified. Agreement has been reached with regards to provision of pre-construction noise and vibration assessments and Section 61 applications in accordance with the requirements of ESC. This was agreed at Deadline 6. The Applicant has provided justifications for the exceptions in the core working hours (see AP33 within **Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]**) and explained that in some cases there are more bullet points for exceptions than in SPR's applications only because the two Applicants have described exceptions differently, not because there are significantly more exceptions in the Proposed Project draft DCO. The Applicant would agree that there is disagreement between the parties here; the Applicant would note that the working patterns of teams on transmission projects are different to those on wind farm projects; the working hours in the Proposed Project DCO are consistent with those adopted in recently consented transmission DCOs.	
3.5.2 **N/A**		Working hours - coordination	See Section 7.4.2 of ESC's LIR [REP1-128] and ESC's ISH2 post-hearing submission [REP4-119]. The Applicant suggests that longer working hours will, in theory, result in the Project's construction being completed sooner. Whilst ESC appreciates that there is a balance to be struck, considering the		

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			construction impacts of other projects and the extended duration of works at the co-location site at Saxmundham and convergence of projects at Friston, the duration of associated disturbance to the local communities is expected to be significant if all are consented. Therefore, respite in these extended durations must be given full consideration. Given that all other comparable projects provide this respite (including projects promoted by SPR), ESC considers it entirely inappropriate to now start including these periods and creating impact at times where ESC and other projects have deliberately prevented it, particularly given the spatial relationship between SPR's projects and the proposed Sea Link project. Furthermore, ESC queries the Applicant's assertion in response to ExQ1 Question 1GEN49. [REP3-069] that restricting core working hours to exclude Saturday afternoons, Sundays and Bank Holidays *'would result in a delay of between 21 and 33 weeks'* and *'an additional cost would be borne by British energy bill payers of between £443m and £886m'*. To ESC's knowledge, no justification or evidence has been provided to explain how these figures were reached. Certainly, as far as ESC is concerned, little, or in reality no, weight can be afforded to them. The Applicant also states in its comments on ESC's LIR [REP2-027] that a shorter construction phase would allow for greater colocation and cooperation between projects. ESC would request further explanation of this assertion from the Applicant as it is unclear how this conclusion has been reached. The ExA and the Secretary of State should be aware that the proposed core working hours are a fundamental source of disagreement between ESC and the Applicant.		

Table 3.6 Friston Substation

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.6.1	**N/A**	Legacy benefits associated with reduction in flood risk	Section 6.5.5 of ESC's LIR [REP1-128]. The existing watercourse in proximity to Friston Substation and the village experiences well known and regular problems due to silting and lack of maintenance. This presents an opportunity for the Applicant and other project promoters to plan and implement a solution benefiting the local community over and above the needs of the NSIP projects within the area. ESC accepts that the wider watercourse maintenance issue extends beyond the order limits for the project. ESC has raised this matter more than once with the	The Applicant has embedded robust measures and controls within the design of the Proposed Project to ensure no contribution to flood risk in the village of Friston during construction of the Proposed Project and over its operational lifetime, inclusive of resilience to the predicted impacts of climate change. The Sustainable Drainage systems that will serve the Proposed Project will capture rainfall runoff, storing and treating it, prior to release back to the local water environment, with runoff during events inclusive of the 1% annual exceedance probability storm, with additional freeboard and climate change allowances.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			Applicant in project meetings (and with NGV regarding LionLink) as it presents a valuable opportunity for developers to implement a much-needed legacy benefit within the village of Friston. The Applicant had the opportunity to avail itself of this opportunity but has not done so and now relies on the Order Limits which it identified and selected. This of itself demonstrates the detached approach the Applicant has adopted to the impact its proposal will have on the local community and its refusal to consider areas within which this impact could be mitigated. ESC does not consider this to be acceptable.	The Applicant is not best placed to undertake desilting and maintenance of existing watercourses that the Proposed Project does not rely on for drainage. Such works would need secondary consent from the Lead Local Flood Authority in addition to the consent of the relevant riparian landowner(s) who hold maintenance responsibility. The Applicant has listened to the concerns raised by local stakeholders and has amended the drainage strategy for the permanent drainage solution for the Suffolk Substation. The permanent drainage has now been confirmed as an infiltration system that will no longer require an outfall to the drainage culvert at Church Lane. This removes an element of existing overland flow that currently discharges to the local watercourses, due to impermeable ground, and routes it to a new infiltration system located in preferential permeable ground.	
3.6.2	**N/A**	Operational noise	See Section 6.5.6 of ESC's LIR [REP1-128]. The Applicant has scoped operational noise of the proposed Friston Substation out from assessment. ESC does not agree as this substation is subject to a site rating level imposed by East Anglia ONE North and East Anglia TWO DCOs, therefore NGET needs to be very confident that the introduction of further or different equipment will not impact that constraint. At Deadline 4, the Applicant stated in response to actions arising from ISH2 [REP4-086] that the only noise at the Friston Substation would *be 'short-term noise from switchgear equipment operating a limited number of times a year'*. Whilst accepting the principle that very infrequent operation of switchgear is unlikely to pose a significant impact in isolation, ESC requested that the Applicant demonstrate that the additional number of operations associated with the inclusion of Sea Link at the site does not result in impacts that are not present with the current consented projects alone. Whilst this was accepted in terms of EA1N and EA2, additional "limited numbers of times a year" could cumulatively amount to a significant impact and ESC needs to be confident this is not the case with the additional operations created by Sea Link at this site. ESC is content with the wording of REAC commitment NV12, added at Deadline 5, which commits to an operational noise rating level of 5 dB below background. ESC would, however, prefer an operational noise limit to be secured via a DCO Requirement. ESC provided suggested wording for an operational noise DCO Requirement in response to ISH3 Action Point 1, and the ExA has since included this in its schedule of changes to the draft DCO. Therefore, whilst the proposed operational noise limit is agreed, the method of securing it remains 'not agreed'.	The Applicant welcomes ESC's agreement that noise levels are and the wording of commitments are agreed. As discussed extensively with ESC, it is not necessary for all commitments in the REAC to be also or alternatively secured in DCO requirements as the REAC is secured by Requirement 5 in the draft DCO (**Application Document 3.1**).	Not Agreed

Table 3.7 Project-wide: Socio-economics, leisure and tourism

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.7.1	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Baseline conditions and request for ongoing monitoring	See Section 7.8.3 of ESC's LIR [REP1-128] and Ref D5.7.01 in ESC's Deadline 5 PADSS [REP5-184] for further context. The impacts resulting from the many major infrastructure developments facing East Suffolk means that it is difficult to predict future baseline conditions out to 2031 with any degree of accuracy. Equally, it is difficult to disaggregate certain impacts of the proposed Sea Link project from other significant infrastructure projects locally. Without ongoing monitoring and evaluation, changes in baseline conditions cannot be assessed and the effects on socioeconomic, leisure and tourism receptors cannot be determined. ESC is firmly of the view that the desk-based methodology is insufficient for the conditions described, and has maintained throughout the Examination that it requires the Applicant to work with ESC and commit to the following: • To review and update their assessment of baseline conditions immediately prior to commencement of construction of the Suffolk Onshore Scheme, thereby ensuring that baseline conditions are current. • To discuss and agree the scope and frequency of ongoing monitoring and reporting of socioeconomic conditions and workforce projections during the construction phase of the project. This would also support proactive planning for worst-case scenarios, particularly those arising from the overlapping peak construction phases of Sea Link, Sizewell C, and other major developments that may collectively impact local socio-economic, recreational and tourism assets. With regards to the first of ESC's requests, the Applicant has stated in its comments on ESC's LIR [REP2-027] that Section 10.7 of Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005] defines a future baseline, incorporating projected demographic trends and planned development land. ESC considers that this future baseline cannot be relied upon. Given the number and scale of energy NSIPs and other major developments either being constructed or planned for construction in East Suffolk, ESC is strongly of the view that a review of the baseline conditions is	The Applicant has undertaken a comprehensive assessment and is not intending to review and update their assessment of baseline conditions immediately prior to commencement of construction of the Suffolk Onshore Scheme. Full details of commitments relevant to tourism are provided within **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7. Through its SE04 commitment, the Applicant has committed to further liaison with local planning authorities including SCC and ESC, and tourism organisations including the Local Destination Management Organisation ("DMO") and the Local Visitor Economy Partnership ("LVEP") during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. Additionally, through its SE05 commitment, this sets out the Applicant's proposed approach to both ongoing monitoring and the implementation of measures to address potential effects on the local tourism and accommodation sector to manage the extent to which contractors would use accommodation in areas highlighted as sensitive by ESC along the Suffolk Coast. The Applicant has provided a detailed response with regards to tourism monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2). Given there are no significant residual socio-economic effects as a result of the Suffolk Onshore Scheme, the Applicant does not consider it proportionate to commit to broader monitoring of socio-economic conditions during the construction phase.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			needed prior to construction commencing to ensure that the predicted 'future baseline' is accurate. With regards to the second of ESC's requests, ESC maintains that the monitoring and evaluation of prevailing socio-economic conditions throughout the construction period is essential if appropriate interventions that minimise the risks and maximise the benefits of the proposed project are to be developed and delivered. Whilst supportive of the broader commitment within REAC measure SE04 to liaise with key tourism stakeholders, ESC remains concerned as to how this commitment will work in practice. Following a meeting with the Applicant, ESC needs reassurance that the Applicant will agree to and support the discussed mechanism by which the Applicant could engage with established stakeholder groups in East Suffolk. An integrated, collaborative approach would benefit all parties, ensuring a forward looking, quantitative assessment of risk and opportunity, coupled with co-developed mitigation and benefit interventions. REAC SE05 commits the Applicant to monitor and mitigate the impacts of the proposed project on tourist accommodation locally. ESC provided comments on this commitment in Appendix A of its ISH3 post-hearing submission [REP6-160]. Whilst ESC welcomes the amendments made to this commitment at Deadline 6 in response to feedback provided by ESC, ESC maintains that the commitment should form part of a more detailed 'Workforce Accommodation Strategy'. ESC's suggested wording for a DCO Requirement in this regard is provided in response to ISH3 Action Point 1. Finally, ESC welcomes the Applicant's commitment to a Social Value Strategy in REAC measure SE06. However, there remains a continued lack of detail within the commitment. Notwithstanding ESC's concerns about the content of the Applicant's Skills, Supply Chain and Employment Plan (as set out in the 'Potential for beneficial socio-economic impacts' row below), ESC considers that, when approved, the Plan would be a useful addition in support of REAC commitment SE06. ESC is therefore not satisfied that the Applicant has adequately addressed its requests for an updated baseline assessment pre-commencement, and for ongoing monitoring of socio-economic receptors. These matters therefore remain 'not agreed'.		

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.7.2	**Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]**	Assessment methodology	See Section 7.8.7 of ESC's LIR [REP1-128]. ESC considers that the assessment methodology used is insufficient and fails to account for the complexities and interdependency of socioeconomic receptors in a successful visitor economy, and the evolving economic environment of East Suffolk. For example, limiting the Study Area to 500 m from the Onshore Scheme Boundary does not adequately assess the impacts of construction on a bed and breakfast receptor located beyond the Study Area, despite its dependence on its guests having unhindered access to local destinations. ESC has been requesting that the Applicant re-considers its assessment and the conclusions drawn. In the case of the visitor economy, the impacts of the Suffolk Onshore Scheme on individual receptors should not be measured in isolation, and without consideration of the wider effects on the visitor economy. The receptors, or factors, are interdependent and collectively contribute towards a successful visitor economy. These include a mix of tangible assets such as local infrastructure, attractions, accommodation, and amenities; as well as intangible assets such as the perception and reputation of a destination; all of which contribute to the overall visitor experience. Collectively, these factors are indicators of system health and should be measured and evaluated during the construction period, and into the operational period. ESC recommends a broader and more comprehensive approach to monitoring impacts on the visitor economy. One that extends research methodologies beyond desk-based assessments and draws on mixed methodologies such as surveys, interviews, and other primary data to understand the key strengths, vulnerabilities, and health of the visitor economy. ESC has demonstrated its willingness to work with the Applicant and develop appropriate assessment methodologies. ESC maintains its view that the Applicant has failed to recognise the visitor economy as a complex system, and ESC therefore remains concerned about the Applicant's assessment.	The Applicant has provided a 500 m buffer to capture tourism receptors but has also identified and assessed receptors beyond 500 m which have the potential to be impacted. The bed and breakfast receptor has been assessed as not significantly affected by the Suffolk Onshore Scheme. The Applicant's socio-economic, recreation and tourism assessment concludes that the Suffolk Onshore Scheme would not result in significant adverse residual effects on tourism or the visitor economy. Additional evidence was submitted at Deadline 3 through the Visitor and Tourism Assessment Technical Notes for Suffolk (**Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]**). The Applicant reviewed evidence from comparable NSIPs, including Sizewell C, Bramford to Twinstead and East Anglia ONE North and TWO Offshore Windfarms. These projects adopted comparable methodologies and the Technical Note concluded that material impacts on the tourism sector or on visitor numbers were unlikely. Monitoring evidence from other large energy infrastructure projects indicates that initial concerns about visitor perception do not typically translate into measurable impacts on tourism activity. For example, monitoring associated with Hinkley Point C Nuclear Power Station indicates that over 90% of visitors reported their experience was not affected by construction activity and tourism employment in Somerset increased during the construction period. Given there are no significant residual socio-economic effects as a result of the Suffolk Onshore Scheme, the Applicant does not consider it proportionate to commit to broader monitoring of socio-economic conditions during the construction phase.	Not agreed
3.7.3	**Application Document 9.120 Detailed Skills, Supply Change and Employment Plan [REP6-101]**	Potential for beneficial socio-economic impacts	The potential for beneficial socio-economic impacts are recognised by ESC, but these benefits can only be maximised through the design and delivery of appropriate initiatives that support skills, employment, and supply chain opportunities. Throughout the Examination, ESC has been requesting that the Applicant prepares an Employment and Skills Plan to support outreach to schools, apprenticeships and local employment either directly or indirectly on the Suffolk Onshore Scheme, and a Supply Chain Plan to help local businesses identify opportunities for gaining contracts within the supply chain during the construction,	The Applicant has prepared **Application Document 9.120 Detailed Skills, Supply Change and Employment Plan [REP6-101].** In addition, the response to 3SERT1 (within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]**) provides the Applicant's response to SCC's suggested DCO requirement for a Skills and Employment Plan, The Applicant presented the plan to ESC and subsequent comments on 8 April 2026 were received. These were reviewed and where possible incorporated into the plan.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			operation, and decommissioning phases of the Suffolk Onshore Scheme. ESC notes that the Applicant has prepared a Skills, Supply Chain, and Employment Plan (SSCEP) [REP6-101]. ESC provided comments on the Applicant's draft SSCEP in response to ISH3 Action Point 27 [REP6-161]. From ESC's reading of the SSCEP submitted into the Examination at Deadline 6, it appears to be largely unchanged from the draft sent to ESC and SCC ('the Councils') on 19th March, despite the Councils providing feedback on 8th April. The SSCEP falls significantly short of the Councils' expectations. Unless the Plan is amended to the Councils' satisfaction such that it can be secured under the DCO as an outline plan, with a detailed plan to be approved post-consent through a requirement discharge, it is suggested that a Requirement such as that proposed by Suffolk County Council in its response to ExQ2 2CEInter1 (page 64 of [REP5-204]) should be added to the draft DCO.	The plan does not represent mitigation of any effects and is a plan to help maximise the positive gain for the local community. Therefore, it is felt that a detailed plan, presenting how the Proposed Project will integrate with existing programmes, rather than create new standalone initiatives is appropriate. The actions have been developed to reflect the likely economic impacts and are proportionate to the scale of employment anticipated to be created and aligned with wider regional activity. The Applicant has numerous existing activities across skills, employment and the supply chain so demonstrate the strong social value initiatives and impacts. There are opportunities to deploy these existing activities locally, for the benefit of local businesses, employees, communities and residents. To support this the Applicant has included the commitment on social value (SE06) (see **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7) stating the Applicant (including the contractors) will develop and implement a Social Value strategy. As the Proposed Project develops, this will be shared with ESC.	
3.7.4	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Impacts on the visitor economy, particularly for coastal communities at the landfall	See Sections 7.8.4-7.8.7 of ESC's LIR [REP1-128] and Section 4 of ESC's comments on the Applicant's Deadline 3 submissions [REP4-184]. ESC considers that the combination of impacts resulting from the Suffolk Onshore Scheme and other developments in East Suffolk would have significant effects on visitor perception and experience, resulting in a reduction in repeat tourism, long-term reputational damage, and economic decline. ESC is concerned that the Applicant has failed to adequately recognise these cumulative impacts. ESC is also seriously concerned that the available visitor accommodation within a 60-minute drive of the Suffolk Onshore Scheme may not be sufficient to accommodate the non-home-based workforce without causing potential harm to the visitor economy. It is ESC's view that non-home-based workers could compete with visitors for accommodation, and in a worst-case scenario, there is a very strong potential for the in-combination cumulative demand effects of multiple NSIP Resolution developments to exceed the supply of visitor accommodation. ESC would expect to see that impacts on individual receptors across the District of East Suffolk, including holiday rentals, tourist accommodation, farms and businesses directly affected by the changes resulting from the cumulative impacts of the Project with other proposed/consented projects in the area, be appropriately mitigated and compensated. Impacts on the visitor economy are dynamic and likely to change throughout the construction period. This requires ongoing dialogue and engagement between local	The Applicant's socio-economic, recreation and tourism assessment concludes that the Suffolk Onshore Scheme would not result in significant inter-project cumulative effects on tourism or the visitor economy. Additional evidence was submitted at Deadline 3 through the Visitor and Tourism Assessment Technical Notes for Suffolk (**Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]**). The Applicant reviewed evidence from comparable NSIPs, including Sizewell C, Bramford to Twinstead and East Anglia ONE North and TWO Offshore Windfarms. These projects adopted comparable methodologies and the Technical Note concluded that material impacts on the tourism sector or on visitor numbers were unlikely. Monitoring evidence from other large energy infrastructure projects indicates that initial concerns about visitor perception do not typically translate into measurable impacts on tourism activity. For example, monitoring associated with Hinkley Point C Nuclear Power Station indicates that over 90% of visitors reported their experience was not affected by construction activity and tourism employment in Somerset increased during the construction period. Given there are no significant adverse residual socio-economic effects as a result of the Suffolk Onshore Scheme, the Applicant does not consider it proportionate to commit to broader monitoring of socio-economic conditions during the construction phase. Notwithstanding this, the Applicant has committed to further liaison with local planning authorities including SCC and ESC, and tourism organisations including the Local Destination Management	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			stakeholders and the Applicant to ensure that the impacts are understood and addressed. ESC therefore requests that these mitigation and compensation measures be developed in collaboration with ESC and the businesses themselves to maximise the effectiveness of the proposed strategies. ESC acknowledges and welcomes the Applicant's commitment SE04 within the updated REAC in this regard, and looks forward to working with the Applicant to develop the means to understand and resolve impacts on both the visitor and wider economy. However, as previously noted, ESC does maintain concerns regarding how this REAC commitment will work in practice. Following review of the Applicant's submitted commentary on ESC's LIR [REP2-027], it is apparent that the Applicant and ESC will not be able to agree on the magnitude of anticipated impacts due to be introduced on the coastal communities at the landfall (Thorpeness and Aldeburgh). ESC's position remains unchanged. As explained in the LIR [REP1-128], the coastal communities in this region have limited access routes in and out and they rely on the visitor/tourism economy. There is no doubt that there will be residual impacts felt on the tourism economy. The Applicant has stated in its comments on ESC's LIR [REP2-027] that there is *'limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on touurism'.* ESC has previously stated that the number and scope of multiple NSIP developments in East Suffolk is without precedent, and to its knowledge, without compare. This unique circumstance means that reference to the methodologies and findings of other NSIP application documents cannot be viewed as being applicable or transferable to East Suffolk, despite the Applicant's attempts to demonstrate otherwise. ESC is concerned that the perception of the area is already changing as evidenced in the open floor hearings, and each successive NSIP consented in this region will add to this impact. Even before consent is granted, perception of a once popular tourist destination can be altered as visitors don't want to have their fond memories of these locations tainted. The findings of ESC's recently commissioned Visitor Perception Research can be found in Appendices E and F of ESC's comments on the Applicant's Deadline 3 submissions [REP4-184]. The Applicant's view that there will be 'no residual significant effects' is therefore not supported by ESC or the local communities it represents.	Organisation ("DMO") and the Local Visitor Economy Partnership ("LVEP") during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. The Applicant has provided a detailed response regarding tourism impact monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2), and full details of commitments relevant to tourism are provided within **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7. This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026.	

Table 3.8 Project-wide: Health and Wellbeing

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.8.1	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Mitigation	The Applicant states, at Paragraph 11.8.1 of the Health and Wellbeing ES Chapter [APP-058] that *'the Proposed Project has been designed, as far as possible, following the mitigation hierarchy'*. ESC does not accept this assertion and considers that the Applicant has not *'as far as possible'* avoided or reduced the mental health and wellbeing impacts of the Proposed Project. Most notably, as discussed below, the Applicant has failed to propose reasonable core working hours to provide the local community with respite from construction activity. This is an extremely important mitigation measure that the Applicant has failed to implement for the sake of its own project programme and costs. This is unacceptable to ESC and the local communities it represents. Managing appropriate working hours is a critically important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities. ESC is therefore concerned that the proposed Sea Link project has the potential to give rise to an unacceptable risk to human health, and ESC does not consider that the Applicant has made a genuine attempt to propose adequate measures to avoid and mitigate mental health and wellbeing effects in particular. Given ESC's significant concerns regarding the mental health and wellbeing impacts of the project, ESC noted in response to ExQ3 3GEN2 its view that the presumption for consent for this 'Critical National Priority' infrastructure may not apply.	The Applicant met with SCC and ESC on 7 April 2026 to further discuss health and wellbeing. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions [REP6-111]** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 which address the management of potential impacts on health and wellbeing. Notwithstanding the absence of significant effects and taking into account the existing embedded mitigation commitments, the Applicant has identified further proportionate measures within the REAC in recognition of SCC, ESC and the community's concerns regarding health and wellbeing. These are intended to provide reassurance and support where feasible, while acknowledging that no significant residual effects are anticipated. These proposed measures are included as measure HW02 and comprise the following commitments: • Provision of a Community Liaison Officer (CLO) trained in mental health awareness. • Meet the Project events in Saxmundham and Aldeburgh – one-to-one surgeries where people can meet National Grid's community liaison officer in a neutral space to ask questions and make suggestions without having to travel to the main construction compound - which may be intimidating and not practicable for safety reasons. • Providing a community contact phone line and email address where people can go with any queries which we will aim to respond to personally rather than generically. Ensuring that these contact details are widely displayed and included on all community updates. • Ensuring contractors follow mental health-aware community behaviour standards. • Attend and contribute to the Sizewell Health and Wellbeing Working Group meetings, if the existing attendees are in agreement. Specifically in regard to construction working hours, the Applicant has provided a detailed response in Table 3.5 above.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.8.2	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]**	Assessment conclusions	ESC cannot agree with the Applicant's findings of 'no likely significant adverse effects' on health and wellbeing as a result of the Proposed Project, and when considered cumulatively with other projects in the locality. As discussed in further detail below, East Suffolk's residents are experiencing significant disruption from other major infrastructure projects in the District, including those currently under construction, such as Sizewell C and SPR's EA1N and EA2 projects, and those at earlier stages of the consenting process, including LionLink. Sea Link is exacerbating, and will continue to exacerbate, these effects. ESC already has concerns for the mental health and wellbeing of its local communities, and therefore rejects the Applicant's conclusion that the cumulative effects of Sea Link in combination with other projects in the area will not have significant adverse effects on mental health and wellbeing.	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** presents the assessment conclusions. No significant residual effects were identified from a health and wellbeing perspective. In addition, no significant inter-project cumulative effects were identified from a health and wellbeing perspective (**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]**).	Not agreed
3.8.3	**N/A**	Cumulative impacts on mental health and wellbeing	It is essential that NGET genuinely engages with the local communities and parish and town councils. The issue of the impact on wellbeing will be felt across this area of the District but will be intensified in communities which have been subject to previous NSIP proposals. ESC already has concerns for the mental health and wellbeing of communities already subject to a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the Sea Link proposals are likely to further exacerbate these existing issues. A recent survey by Suffolk Mind, commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area. It is important to stress that increases in working hours can have significant adverse effects on people's health and wellbeing. ESC has continually stressed throughout the pre-submission engagement with the Applicant that the District is home to multiple consented, planned and operational NSIPs, and that there will be temporal and spatial overlap in the construction phases of these projects, which can compound the effects on people's health and wellbeing. Many areas within the Suffolk Onshore Scheme Order Limits are highly sensitive and residents are already experiencing significant disruption from other major infrastructure projects. It is not enough for the Applicant to merely 'recognise' the adverse mental health impacts of the Proposed Project and the local community's concerns, including, but not limited to, the extensive proposed working hours. Instead, these concerns must be taken on board by the Applicant to inform its proposed works and mitigation. ESC is far from convinced that this has been the case to date. For example, the Applicant continues to justify prolonged, significant disruption to the local community (and the subsequent mental health impacts) caused by its proposed core working hours by citing the identification of the project as 'Critical National Priority'. ESC considers that the Applicant has unacceptably failed to grasp the magnitude of impact or adequately	The Applicant recognises the potential for future environmental changes associated with the Proposed Project, and specifically, that increases in construction working hours particularly during weekends and bank holidays are of considerable concern to residents and the Council with regards to the health and wellbeing of its communities. The Applicant has provided a detailed response regarding construction working hours in Table 3.5 above. The Applicant recognises that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. Throughout the development phase of the Proposed Project, the Applicant has therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. Additionally, the Applicant has provided a full response to matters regarding measures to reduce effects on mental health and wellbeing above under Ref 3.8.1.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			consider the health and wellbeing of the local community in formulating its proposals.		
3.8.4	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**	Impacts on local communities (mental health and wellbeing)	Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities.	The Applicant has provided a full response to this matter regarding the position on construction working hours (see Table 3.5), and measures to mitigate effects on mental health and wellbeing (see Ref 3.8.1).	Not agreed

Table 3.9 Project-wide: Ecology

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.9.1	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Hazel dormice	See Section 7.2.2 of ESC's LIR [REP1-128] and Agenda Item 3.4 of ESC's ISH2 post-hearing submission [REP4 117]. ESC notes and welcomes the additional commitments to pre-construction surveys for hazel dormouse and potential construction mitigation measures included in sections 3.4 and 7.1 and in Appendix B of the OLEMP [REP6-078]. ESC also welcomes the sharing of the pre-commencement survey methodology separately to the OLEMP. ESC considers that this has addressed its comments on pre-commencement survey methods, but maintains that the results of the pre-construction surveys should then be used to inform the preparation of the LEMP to be approved under Requirement 6. ESC welcomes the Applicant's commitment to updated baseline surveys in Area D in 2026 using the survey methodology from the latest best practice guidance and also understands that the Applicant will slightly extend the survey radius in this area. However, the commitment to this being carried out "if possible, prior to vegetation clearance" is of significant concern. The survey methods rely on vegetation being present and therefore the updated baseline surveys must be undertaken before any vegetation clearance works are undertaken. Otherwise, accurate survey results will not be obtained, and it will not be possible to determine the full extent of the site clearance mitigation measures, including any need for a mitigation licence from	The ExA had asked for a schedule of surveys to be included in the Suffolk oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7). This was subsequently added at D6. It is noted that ESC welcomes the Applicant's commitment to updated baseline surveys. As requested by ESC, the words "if possible" have been removed from the dormouse survey row of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7. It should be noted that the words "if possible" were not a reference to possibly doing a survey after vegetation clearance, but to the possibility the landowner might decline access prior to grant of the DCO. In practice sufficient access has been obtained. The Applicant maintains its position regarding the remainder of East Suffolk Council's comment, as expressed in the Applicant's Response to East Suffolk Council's LIR.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			Natural England. Following further correspondence with the Applicant, ESC understands that this part of the sentence will be removed from the version of the OLEMP to be submitted at Deadline 7. However, on the basis of the OLEMP as currently drafted, this matter remains outstanding. ESC requests that the ExA satisfy themselves that this OLEMP amendment has been made at Deadline 7.		
			Notwithstanding the commitment to pre-commencement surveys and construction mitigation, ESC maintains its position that the surveys undertaken to date fall below the standard set by the best practice guidance in place at the time that they were carried out. The Applicant's assertion that this deficiency is immaterial because it was only minor ignores the point of there being minimum survey effort levels included in best practice guidance – if dropping slightly below the minimum effort wasn't important, then the minimum effort level wouldn't be set where it is. Also, the Applicant's statement that the survey effort in Zone D was only below the minimum amount due to landowner activity is considered to be incorrect. As set out in Paragraph 7.2.2.4 of ESC's LIR [REP1-128], ESC consider that the month in which the nest tubes were put out (October 2023) is also included in the calculation even though they were not installed until the end of the month and therefore were not available for animals to locate and use in that month.	See Applicant's response to 7.2.1.3-7.2.1.4 within **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]**. The Applicant's position remains, and the requested updated baseline surveys are to be undertaken as noted in the above row (Ref 3.9.1).	Not agreed
			Notwithstanding the discussion on this matter as part of ISH2, ESC also maintains its position that the Applicant's assertion at Paragraph 2.9.192 of the Ecology and Biodiversity ES Chapter [REP4-025] that there would be a moderate beneficial long-term (significant) impact on dormice due to habitat creation is contrary to their claim elsewhere that dormice are absent from the Order Limits. ESC considers that the proposed landscape planting cannot be of benefit to a species which is claimed by the Applicant to be absent. Additionally, the bulk of the proposed new planting is at the converter station location, whereas the potential dormouse nest was found during surveys for the project further east along the proposed cable route. ESC considers that this benefit should be downgraded to 'negligible' (i.e. 'not significant') if the project maintains that the species is absent from these sites. The corresponding row of Table 2.11 should also be updated to reflect this.	The Applicant maintains its position regarding the remainder of ESC's comment, as expressed in the Applicant's Response to East Suffolk Council's LIR (**Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027])** and as expressed at ISH2 - see 3.4 within **Application Document 9.89 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 (ISH2) [REP4-085]**.	Not agreed
3.9.2	**Application Document 7.5.7.1 (E) Outline Landscape and**	Bats	See Section 7.2.5 of ESC's LIR [REP1-128], Agenda Item 3.4 of ESC's ISH2 post-hearing submission [REP4-117] and Agenda Item 13.3 of ESC's ISH3 post-hearing submission [REP6-160]. The Applicant's acknowledgement in Section 7.2.5.3 of [REP2-027] of bat detector equipment failure is noted. However, ESC	The ExA had asked for a schedule of surveys to be included in the Suffolk oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7). This was subsequently added at Deadline 6 and it also includes updated tree surveys for roosting bats.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	Ecological Management Plan – Suffolk submitted at Deadline 7		maintains that, as set out in Paragraph 7.2.5.7 of its LIR [REP1-128], survey effort above the minimum requirement in one part of the Order Limits is not a proxy for understanding bat activity in another part of the Order Limits. All it does is add to the amount of bat activity recorded across the whole Order Limits when the results are pooled. The Applicant states in [REP2-027] that the redeployment of detectors in the same month that they failed was often not possible due to notice periods agreed with landowners, however if this was the case then additional months of survey to make up the deficit would have resolved the issue. ESC notes that the Applicant has updated Section 7.1 and Appendix B of the OLEMP [REP6-078] at Deadline 6 such that it now provides further detail regarding the surveys that will be undertaken for bats pre-construction. ESC welcomes the commitment to bat activity surveys but maintains that pre-commencement bat activity surveys need to be carried out at all baseline static detector survey locations, not just at those locations that experienced equipment failure in the months that they failed. Only undertaking surveys at some locations during some months in 2026 and then combining them with the DCO survey results will not give an accurate picture of bat activity through the year across the Order Limits. ESC notes and welcomes the inclusion of pre-construction tree roost surveys in the D6 OLEMP.	The Applicant's position on the remainder of ESC's comment remains as expressed in the response to ESC's LIR (**Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027])** and as discussed at ISH2 and ISH3.	
			Notwithstanding the above, ESC maintains its concern set out in Paragraph 7.2.5.6 of its LIR [REP1-128] regarding the practicality and technical feasibility of mitigating every hedgerow crossing as though the hedgerow was important for bats. ESC has provided further detail of its concerns with the Applicant's proposed approach in its ISH2 post-hearing submission [REP4-117]. ESC also notes the Applicant's comment in [REP2-027] Section 7.2.5.4 and at ISH3 in relation to consideration of the use of techniques other than open cut for crossing hedgerows. Whilst the rationale for the approach proposed is understood, ESC maintains that it is primarily programme rather than ecological considerations that have driven the choice of construction technique. ESC would welcome working further with the Applicant during the detailed design phase to further minimise hedgerow crossing widths wherever possible.	The Applicant's position remains as expressed in the response to East Suffolk Council's LIR (**Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027])** and as discussed at ISH2 and ISH3 (see **Application Document 9.133 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3 [REP6-108]**). As discussed at ISH3, in deciding whether a trenchless crossing methodology should be used to install the cables the following was considered: 1. Temporary land take – for high voltage cables, trenchless methods need much more land than open cut trenching due to the need for drive and receptor compounds and laydown areas. The Suffolk HDD compound provides an example of approximate size. 2. Larger permanent easement - trenchless methods need to be installed at greater depths than open cut, which requires cables to be separated further from each other to avoid affecting electrical capacity. A wider easement is also needed to allow for any variation in the alignment during the installation process. 3. Longer programme – generally takes much longer to HDD. Open cut might take days; HDD may take a month or more in each case (including set up).	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
				4. Increased need for lighting - once an HDD drill starts it must continue until it is finished, meaning greater potential for night working than open trenching. 5. Greater vehicle movements – trenchless construction requires additional vehicle movements due to the specialist plant and need to service the drilling. These factors were all considered by the Proposed Project ecologists. It was decided that the shorter disruption provided by open trenching was preferable and less disturbing overall to wildlife including bats. Regarding additional measures to be implemented to further reduce hedgerow crossing removal widths, these cannot be identified as part of the DCO but will be done by the contractor as part of detailed cable design. As a general principle, the Applicant will work with the contractor to ensure all hedgerow gaps are as small as practicable for the works required.	
3.9.3	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Reptiles	ESC welcomes the amendments made to the OLEMP and REAC at D6, including the recognition that reptile translocation may be required and that reptile mitigation measures will be agreed with ESC prior to vegetation clearance commencing.	The potential use of trapping and translocation was added to the oLEMP at Deadline 6 (refer to **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]** submitted at Deadline 7).	Agreed
3.9.4	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**	Hedgehog	ESC welcomes the commitment to mitigation measures in relation to hedgehog and vegetation clearance contained in REAC Action B72.	The measure was added to the REAC (see **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7). The oLEMP was also updated at Deadline 6 to reflect this commitment in the REAC (refer to **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7).	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	submitted at Deadline 7				
3.9.5	**Application Document Appendix K5 Natural England's comments on the Examining Authority's Written Questions 2 [PD-021]**	Red deer	ESC welcomes the Applicant's commitment to include construction deer fencing as a matter for approval in the LEMP.	The ExA's third written questions (3ECOL9) asks the Applicant, regarding deer fencing, to include a commitment to detailed construction fencing plans being submitted for approval as part of the LEMP, or through a separate DCO requirement as suggested in ESC's response to ExQ2 question 2LVIA8 (**Application Document Appendix K5 Natural England's comments on the Examining Authority's Written Questions 2 [PD-021]**) or explain why this is not necessary. The Applicant has therefore included explicit reference to providing deer fencing plans to the local planning authorities for approval, into the LEMP.	Agreed
3.9.6	**N/A**	Biodiversity Net Gain (BNG)	ESC notes the Applicant's response in [REP6-110], particularly Appendix A, in relation to the proposed National Grid BNG procurement procedure. ESC welcomes the commitment made in the procedure to adding additional weight to offsite BNG proposals that are within East Suffolk, in order to ensure that biodiversity gains are kept as close as possible to where impacts from the project will be felt. ESC remains concerned that whilst the proposed Section 106 unilateral undertaking would commit the Applicant to delivering BNG, it does not identify and secure BNG units, nor would it enable ESC to secure the necessary monitoring provisions for onsite BNG units or offsite units if these are not already secured under an existing legal agreement. Whilst the UU refers to monitoring of BNG being undertaken in accordance with the LEMP, there is no reference to this requirement in the D6 OLEMP [REP6-078] and therefore it is unclear how it will be picked up in the final version of the LEMP. ESC therefore maintains that further information on the Applicant's proposals for achieving BNG and how this will be monitored are required before it can be determined that they are likely to be successful. ESC fundamentally disagrees with the Applicant's position that the commitment to BNG should be made via a one-sided unilateral undertaking. It should be a formal agreement to enable ESC to properly ensure delivery (at satisfactory locations), performance and monitoring. For this reason, and given ESC's concerns regarding the lack of detail provided on the delivery of BNG, ESC considers this matter 'not agreed'.	There is not yet in force a statutory legal requirement for the Proposed Project to deliver BNG, and it is seen as entirely beneficial that it will be delivered. The section 106 unilateral undertaking (UU) will commit the Applicant to deliver BNG in line with its corporate commitments. This UU will have the same enforceability as a bilateral section 106 agreement and so is considered entirely appropriate and enforceable in these circumstances. The s106 UU only addresses on-site BNG units, mitigation landscape planting that is included within the BNG on-site delivery is detailed further within the LEMP and covers monitoring requirements. This is addressed in the LEMP in section 7.1.3 where it notes - *A post-construction monitoring programme and reporting procedures will be formalised, agreed with the relevant planning authority and included within the detailed LEMP, prior to construction works commencing*. The detailed LEMP is controlled by Requirement 6 of the DCO and will be produced and approved by the relevant LPAs before construction commences. Any off-site BNG delivered will have the monitoring requirements transferred over to stakeholder who delivers the work and who will be subject to its own legal agreement in relation to the ongoing maintenance of BNG.	Not agreed

Table 3.10 Project-wide: Environmental Protection

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.10.1	**Application Document 7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan - Suffolk [REP6-082]**	Construction noise Lowest Observable Adverse Effect Level (LOAEL)	See Paragraph 7.4.4.2 of ESC's LIR [REP1-128]. ESC considers that the LOAEL has been set too high. The LOAEL is the point where the Applicant is required to "mitigate and minimise" noise and vibration, and this should be based on the baseline noise environment of the area. The project should be mitigating and minimising their impacts on any level above that which is currently experienced. The current LOAEL would suggest that there is no/low impact below this level that is not worthy of mitigation, and this is disingenuous. ESC requires the LOAEL to be amended to accurately reflect the baseline noise environment of the area. In response to concerns raised by ESC in its LIR, the Applicant has stated in [REP2-027] that it agrees that 'construction noise may still be audible below this level and may therefore constitute an adverse effect', but that 'the contractor is required to employ best practicable means (BPM) to reduce construction noise and vibration levels for all works irrespective of this threshold'. ESC does not consider that the requirement on contractors to implement BPM should be used as an alternative to determining a meaningful and realistic LOAEL. Setting an appropriate LOAEL is crucial for identifying the point where noise levels may start to have a detrimental impact on people's quality of life. The use of BPM cannot be used as a substitute for setting the LOAEL, but is of course a welcomed mechanism for reducing impacts as far as practicably possible.	See the Applicant's response within **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]**. The requirement for BPM is irrespective of the LOAEL. The Applicant has an agreement with regards to provision of pre-construction noise and vibration assessments and Section 61 applications in accordance with the requirements of ESC and as such the final noise impacts and the detailed specification of appropriate mitigation has oversight by ESC. This was agreed at Deadline 6.	Not Agreed
3.10.2	**Application Document 7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan - Suffolk [REP6-082]**	Temporal restrictions	See Section 7.4.4 of ESC's LIR [REP1-128] and Ref D5.9.02 of in ESC's Deadline 5 PADSS [REP5-184] for further context. The BS5228-1 'ABC' methodology should be the only assessment of significance for construction noise that is practically used for the project. Notwithstanding the use of other guidance to give wider context at this stage, its use should be supported by the complete adoption of the wider principles of the BS5228-1 standard and Best Practicable Means, and supplemented by S.61 Control of Pollution Act applications where deviation is required to ensure that such deviation is necessary, justified and the smallest it can justifiably reasonably be. ESC notes that the Applicant states in [REP2-027] that '*temporal restrictions are…a 'catch-all' for potential situations where, despite the use of best practicable means, noise levels may not be able to be kept below the noise level threshold'* and '*temporal restrictions would form part of [the] strategy'* to '*mitigate and minimise'* the potential adverse effect. ESC acknowledges that temporal restrictions can help reduce impacts, however it should be noted that simply stating the noise will not occur all the time does not constitute robust mitigation as adverse impacts may still be encountered during phases of the construction.	The Applicant has set out the position on this in **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027].** In addition, the Applicant has agreement with regards to provision of pre-construction noise and vibration assessments and Section 61 applications in accordance with the requirements of ESC and as such the final noise impacts and the detailed specification of appropriate mitigation has oversight by ESC. This was agreed at Deadline 6.	Not Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			The temporal restriction argument should therefore not be relied upon to remove predicted significant adverse and adverse effects, as is currently the case in the Applicant's assessment. Temporal restriction is not a "catch all" to avoid significant adverse effects without the support of significant justification. It is noted that exceedance of the significant adverse effect level will be unavoidable at times and this should at least be quantified before being justified given the policy tests in NPS EN-1 regarding significant adverse effects. The Applicant's response to Section 7.4.4.10 of ESC's LIR [REP2-027] suggests that the application of the lower 'ABC' weekend thresholds will increase the likelihood of exceedances and therefore the potential for significant effects that the Applicant is then proposing to mitigate through temporal restrictions. Effectively this means the requested longer working hours will trigger the need for temporal restrictions to avoid significant impact. ESC therefore finds the Applicant's reliance on temporal restrictions puzzling. It appears that the Applicant wants to be able to work for the maximum amount of time, but to then restrict working time as their primary source of mitigation to avoid significant adverse effects. ESC considers that these two positions are in direct conflict with one another. The Applicant may suggest that the increased core working hours allow for the inclusion of temporal restrictions, but given many of the predicted significant effects that occur are as a result of the extended working hours, ESC would consider such a justification inadequate and unacceptable. This is particularly pertinent here as the project specific factor that is relied significantly upon to prevent the potential significant adverse effect of a threshold exceedance caused by the extended hours is temporal restrictions, again demonstrating the conflict between requesting longer core hours and then mitigating their effect by restricting working time. Paragraph 5.12.17 of NPS EN-1 must also therefore be considered in respect to the viability of granting consent for the project, as the Secretary of State must consider whether the proposals adequately "avoid significant adverse impacts on health and quality of life from noise". Whilst much of this discussion considers exceedance of the construction noise threshold and SOAEL in the extended core hours period, it must also be considered for any exceedance of the thresholds where temporal restrictions are used to mitigate a significant adverse effect. The Applicant must be very confident that significant adverse effects can be avoided. ESC currently does not think this has been demonstrated given the reliance on temporal restrictions, particularly given the lack of detail and wide scope of the definition of temporal restrictions provided by the Applicant in its response to the ExA's s89(3) letter of 5 September 2025 [AS-106].		

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.10.3	**N/A**	S61 consents	The Applicant stated at Paragraph 4.4.2 of the Outline Construction Noise and Vibration Management Plan (CNVMP) – Suffolk [AS-131]: "Where the results of the contractor's assessment indicates the potential for significant effects at NSR, or for working outside of core hours, a Section 61 application may be required." ESC has repeatedly stated throughout Examination that this statement should be clear and state that Section 61 'will' be required, rather than 'may' be required. ESC has reviewed the amended Outline Construction Noise and Vibration Management Plan – Suffolk [REP6-082] submitted at Deadline 6 and is content with the wording in Section 4.4 relating to applications for prior consent under Section 61 of the Control of Pollution Act 1974. This wording allows ESC to determine how it wishes S.61 to be applied to this project and also allows for changes to that application in future should it be necessary. For avoidance of doubt, ESC will require S.61 applications for all work associated with the project, as is the approach taken by SPR for its EA1N and EA2 projects, to ensure regular engagement with the project and to allow for regular review of Best Practicable Means. The appropriate application intervals will be determined at a later date and could be subject to change if influenced by matters such as substantiated complaints. S.61 for all works also covers the gap in the current suggested monitoring procedure for the project, which does not propose routine noise and vibration monitoring; this can be dealt with as part of the relevant S.61 application to ensure that proposed noise levels are met. It should be noted by the project that ESC considers the general site noise thresholds should align with BS5228-1 'ABC' Methodology and that deviation from this in a S.61 will need to be robustly justified with all noise and vibration reduced to the lowest reasonable levels, regardless of threshold in line with the principles and requirements of Best Practicable Means and BS5228-1 and 2.	Noted and agreed	Agreed
3.10.4	**Application Document 7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan - Suffolk [REP6-082]**	Noise and vibration mitigation	See Section 7.4.8 of ESC's LIR [REP1-128]. Along with the selection and adoption of clear noise and vibration limits for construction, mitigation measures are key for the reduction and prevention of impact. BPM standard expected, and this has been committed to, which is welcomed. However, ESC notes that the Applicant has identified that a number of significant impacts are likely to arise without mitigation, but with the application of non-specific 'mitigation', all of these significant impacts are resolved. ESC will need to see robust evidence for this in all cases along with the specific details of what mitigation will be available, considered and used, and when delivered, to ensure that not only are significant adverse impacts avoided as required by policy, but that adverse impacts are mitigated and minimised as far as reasonably possible, or preferably avoided entirely. ESC will need more detail in respect to mitigation including likely attenuation performance in order to be confident that works can be controlled so as to avoid significant adverse effects and minimise	The Applicant has set out the position on this in **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027].** In addition, the Applicant has agreement with regards to provision of pre-construction noise and vibration assessments and Section 61 applications in accordance with the requirements of ESC and as such the final noise impacts and the detailed specification of appropriate noise mitigation has oversight by ESC. This was agreed at Deadline 6.	Not Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			adverse effects. The Applicant has stated in [REP2-027] that it is 'confident that significant adverse effects can be avoided at these locations with the implantation of BPM'. They go on to state that 'specific mitigation measures can only be determined by the contractor, informed by their detailed assessments'. Whilst ESC acknowledges that greater detail would be provided by the contractor pre-construction, should the project be consented, ESC considers that further detail is required at this stage. In any case, non-specific mitigation, and temporal restrictions, as discussed above, cannot be relied upon to remove predicted significant adverse effects. This further detail has not been forthcoming over the course of the Examination, so this matter is 'not agreed'.		

Table 3.11 Project-wide: Lack of coordination

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.11.1	**Application Document 7.10 Coordination Document [APP-363]**	Lack of coordination and introduction of cumulative and/or in combination effects	See concerns raised throughout ESC's LIR [REP1-128], including in Sections 3.0, 5.3, 6.3.2, and 6.4.2. ESC is disappointed by the lack of meaningful engagement by the Applicant with other NSIP promoters locally. This has resulted in opportunities for coordination, including with the proposed LionLink project, being missed, limiting opportunities to minimise and avoid cumulative and in-combination impacts. It is ESC's view that the Project as currently proposed does not pay sufficient regard to the environmental and local community benefits of genuine collaboration and coordination between schemes. Opportunities for genuine collaboration and coordination with other subsea cable projects proposing to make landfall in the East Suffolk region over the next decade have been missed. This has resulted in different damaging landfall locations and onshore cable routes being selected by separate projects with little regard being paid to the consequential long-lasting damage that so much onshore infrastructure proposed within the East Suffolk District is causing and will continue to cause to its local communities and the environment. This demonstrates a serious lack of oversight and vision from Government and the commercial promoters of such schemes. No holistic planning has taken place, nor has any thought been given to mitigating the impacts of delivery of future energy infrastructure in this region. Instead, East Suffolk's local communities are being faced with a sporadic succession of different projects, working primarily in isolation to one another whilst being in close proximity, and resulting in cumulative and in-combination	Close and meaningful coordination discussions with other projects and other promoters has been ongoing for several years and have had a profound influence on the development of the Proposed Project. The approach to coordination is set out in **Application Document 7.10 Coordination Document [APP-363]**, including robust positions on all matters raised by ESC on this.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			impacts that are being forced upon the District. This is unsustainable. ESC is of the view that an opportunity for coordination has been missed by both the Applicant and NGV. If the Applicant laid cable ducts for the other project (such as those for HVAC cables running between the Saxmundham converter station site and the Friston substations site) at the same time as laying the ducts for the Sea Link project, this would meaningfully reduce the significant environmental impacts of both projects. The Applicant dismisses ESC's concerns in its response to ESC's LIR [REP2-027], and asserts that coordination has indeed taken place and has 'had a profound influence' on the development of the Sea Link project. This is simply incorrect. ESC maintains the points previously raised on this matter. There is virtually no real coordination being proposed between Sea Link and the proposed LionLink project other than colocation at Saxmundham (which in itself is not coordination). This is evident by the missed opportunity for NGET to install cable ducts for LionLink's proposed HVAC links to Friston Kiln Lane. This means that each project, if consented, will need to install its own HVAC cables in isolation, successively, and in the same area. This unnecessarily elongates the construction works period for host and neighbouring local communities and the environment. ESC requires the Applicant to include the ability within their DCO to provide the ducting for the LionLink project. Leaving space within the same area of land (i.e. HVAC routing options) is not sufficient and does not amount to meaningful coordination between projects as it still requires two consents and two lots of cable installation disruption in the same area. The benefits of coordination, to significantly reduce environmental impacts, have therefore been missed. Given the likely close alignment of the two projects' HVAC cable swathes in this area, coordination has not been built into the project, and this demonstrates that opportunities for real coordination have been missed.		
			ESC has had to face and deal with numerous nationally significant energy infrastructure projects in recent years, all delivered in a piecemeal fashion with little or no regard for the cumulative and in-combination impacts that these projects have forced upon the District. It is imperative, given the pressures this area of East Suffolk is facing from these projects, that the cumulative and in-combination effects of the Project with other proposed and consented projects are fully taken into account, considered and all opportunities for coordination identified and maximised. This is necessary and essential so as to reduce the adverse impacts of the developments on East Suffolk's sensitive and valued environments and the local communities, who have been hit by a constant barrage of energy infrastructure projects and will be subject to years of disruption from	The Applicant has made a commitment to work with NGV and SPR to coordinate PRoW diversions, though noting that the main PRoW that crosses the Friston Substation Site has already been diverted, which means it is unlikely that much in the way of further coordination will be required. The Applicant has committed to working with SZC with regards to Mental Health and Wellbeing through attending and contributing to the Sizewell Health and Wellbeing Working Group meetings, if the existing attendees are in agreement.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			associated construction works, if they are consented and implemented. On the basis of information available at Deadline 7, this matter currently remains 'not agreed'. However, ESC expects the Applicant to engage in discussions, including with ESC and the promoters of other projects in East Suffolk, beyond the Examination, and subject to the progress of these discussions, there is potential for agreement to be reached on this matter.	The Applicant has committed to coordinating with the traffic coordinators for other developments including Sizewell C, EA1N and EA2 and LionLink. Regarding impacts on tourism accommodation, the Applicant has committed to measure SE05, which includes for monitoring where workers are staying and confirming that *"steps will be taken to encourage more workers to stay in accommodation less commonly used by tourists to the coast. This could include discussions with other developers in the Suffolk area about shared use of specialist accommodation"*	
3.11.2	**N/A**	Construction Compounds	See Paragraph 6.6.1.2 of ESC's LIR [REP1-128]. ESC requests that the Applicant engages with NGV to consult and agree coordination of construction compounds with NGV's LionLink project during construction to reduce otherwise unnecessary and entirely avoidable impacts. ESC notes and supports the Applicant's commitment at 6.6.1.2 within [REP2-027]: '*The Applicant will continue to liaise with NGV and should both projects gain consent, opportunities for cooperation throughout construction will be identified and enacted where practicable.*' ESC requires this to be included as a commitment in the REAC [REP4-235]. On the basis of information available at Deadline 7, this matter currently remains 'not agreed'. However, ESC expects the Applicant to engage in discussions, including with ESC and the promoters of other projects in East Suffolk, beyond the Examination, and subject to the progress of these discussions, there is potential for agreement to be reached on this matter.	The Applicant has provided in the plans submitted in the DCO a number of locations for the construction compounds at the Saxmundham converter station site, the purpose of these locations is to provide the Applicant flexibility in the location of the compound to coordinate with the delivery of the NGV Lionlink project, opportunities to minimise the size of the construction compound or share locations are continuing to be discussed between the Applicant and NGV.	Not agreed
3.11.3	**Application Document 7.10 Coordination Document [APP-363]**	Masterplan for Saxmundham Converter Station site	See Section 6.3.3 of ESC's LIR [REP1-128]. Good design can help to lessen the visual impacts of the development which is vital given the scale of infrastructure proposed for the Sea Link project alone, and in a coordinated scenario. The visual impact of the development will be hard to mitigate during construction or in the early years after construction, due to the open nature of the landscape. In order to ensure the delivery of good design in tandem with appropriate mitigation, it is imperative that the converter station site is genuinely master planned. Without the strategic oversight of a master plan, it will be impossible to understand whether the site can accommodate multiple projects and still achieve long term good design. The masterplan should be developed collaboratively with not only the other affected NSIP promoters, but also with statutory consultees, which includes the relevant town and parish councils. ESC notes and supports the Applicant's commitments set out at 6.3.3.4 within [REP2-027]. ESC requests that the Applicant continues to work in collaboration with other NSIP promoters and other stakeholders to ensure the converter station site continues to	The Applicant agrees with the principles of good design, and of the benefits of a masterplanned approach. As extensive masterplan exercise was undertaken in consultation with stakeholders (including NGV, ESC, SCC and the Suffolk Design Review Panel (DRP)). The masterplan has influenced the development of the Proposed Project and represents a key part of the Applicant's ongoing coordination with National Grid Ventures (NGV), **Application Document 7.10 Coordination Document [APP-363]** sets out the role and function of the masterplan, noting that the masterplan exercise covers a greater area than the Proposed Project Order Limits, and consent is not being sought for it.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			be genuinely master-planned in order to achieve long-term good design. ESC welcomes the update noting that 'The Sea Link project team has been consulted by the LionLink team on the updated version of the masterplan which will form part of the LionLink Statutory Consultation. This will demonstrate that coordination is ongoing and there will be further consultation on the masterplan via the LionLink project.' On the basis of information available at Deadline 7, this matter currently remains 'not agreed'. However, ESC expects the Applicant to engage in discussions, including with ESC and the promoters of other projects in East Suffolk, beyond the Examination, and subject to the progress of these discussions, there is potential for agreement to be reached on this matter.		
3.11.4	**Application Document 9.73.1 Applicant's responses to First Written Questions [REP3-069]**	Friston Substation – impact on landscape planting	See Section 6.4.3 of ESC's LIR [REP1-128]. ESC requires the Applicant to use HDD to minimise impacts on SPR's landscape mitigation around the Friston Kiln Lane substation. Cutting a swathe of land for HVAC cable corridors through the previously consented landscape mitigation areas surrounding the substations would result in detriment to the previously approved landscape mitigation efforts for the SPR projects, which must be avoided at all costs. ESC does however acknowledge the positive engagement efforts between NGET, NGV and SPR undertaken to date on early discussions related to how HVAC cables will transit consented SPR mitigation areas at Friston Kiln Lane. ESC maintains that HDD is the favourable option for HVAC cable transit in these areas, noting Sea Link's preference is open cut and fill trenching. However, ESC is aware of the ongoing dialogue between parties currently and appreciates that all options are being explored to minimise future disruption at this early stage. ESC acknowledges and strongly supports the Applicant's comments at 6.4.3.1 within [REP2-027], confirming that 'ongoing collaboration between the various developers, so that the evolving designs can be developed in compatible ways which retain the functionality of the original SPR mitigation planting, while allowing other projects to progress' and at 6.4.3.2 'The Applicant is confident that detailed landscaping designs that accord with the EA1N/EA2 outline masterplan can be developed which retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables.' ESC also notes the Applicant's commitments in 6.4.3.4 which state 'it is not considered to be necessary to install using HDD, as the Applicant is confident that detailed landscaping designs that accord with the EA1N/EA2 outline masterplan can be developed which	The currently consented detailed landscaping design was approved pursuant to Requirement 14(1) of the East Anglia TWO DCO by East Suffolk Council in February 2026. The currently approved landscape design includes a greater degree of planting than required by Requirement 14 (noting that the Outline Landscape and Ecology Strategy, OLEMS, secured on the face of the SPR DCO is not itself incompatible with the Proposed Project). The recently approved design will need to be updated to effectively coordinate with the Proposed Project. A coordinated landscape design has been developed by SPR and the Applicant. The means by which the detailed landscape design will be updated to accommodate the Proposed Project is via a resubmitted landscape design pursuant to Requirement 40 of the SPR DCO, as per the confirmation from ESC. The Applicant continues to engage with SPR to agree the approach to updating the landscaping design. An HDD solution under the landscaping would be unnecessary and unfeasible, including for reasons set out in **Application Document 9.73.1 Applicant's responses to First Written Questions [REP3-069]**.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			retain the effectiveness of the EA1N and EA2 mitigation, while accommodating the Proposed Project cables.' At Deadline 3, ESC was encouraged by recent efforts by the project promoters in order to avoid future disruption to consented landscape mitigation at Friston Kiln Lane. This is a positive step. Whichever method of HVAC installation is taken forwards on the advice of the ExA should consent be granted for the Sea Link project, ESC's primary concern remains the effectiveness of the consented SPR mitigation at Friston Kiln Lane. ESC is encouraged by the Applicant's responses expressed in [REP2-027] and will continue to closely monitor and engage on this matter over the remainder of the DCO examination period, working proactively with all parties as required. ESC notes the Applicant's comments at Deadline 3 to the first Written Questions [REP3-069] and [REP3-070] regarding the proposed project's HVAC interaction with the SPR EA1N and EA2 projects' landscaping proposals at the substations site in Friston. This has also been raised by NGET in the updated draft SoCG between ESC and NGET submitted at Deadline 5. ESC can advise the ExA that the SPR EA1N and EA2 discharges for the Landscape Management Plan (LMP) relating to the Friston substations site (SPR DCOs Requirement 14(1)) have now been discharged (ESC reference DC/25/4821/DRR for EA1N and DC/25/4826/DRR for EA2). In summary, advanced discussions were held between SPR and NGET pre-submission of the substations stage LMPs for EA1N and EA2 in connection with the discharge of R14(1) for the SPR projects' substations stage of works. The discussions focussed on how the landscaping proposals consented under the SPR DCOs might interact with the proposed Sea Link project should consent be granted by the Secretary of State later. SPR delayed the submission of the EA1N and EA2 LMPs with a view to agreeing sections of text to be included within their submission materials in light of ESC's expressed wish that all parties genuinely endeavour to co-ordinate their respective schemes at all stages of the process so as to avoid or minimise detrimental impacts that would otherwise be imposed on local communities set to host or neighbour the onshore infrastructure. At the time of the LMP materials being submitted by SPR to ESC for consideration in order to discharge R14(1), ESC understood that the approach to future coordination between SPR and NGET had been agreed prior to the submission of R14(1) for discharge, which had been reflected within the submitted documents. However, subsequently, NGET submitted an objection to the discharges which elaborated upon the points NGET had raised in [REP3-069] and [REP3-070] at Deadline 3. NGET's objection was therefore in stark contrast to their agreed pre-submission position		

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			with SPR which had been reflected in the agreed text within SPR's submitted LMP's. Given the conflicting nature of the objection received from NGET, ESC sought legal advice on the issues introduced by NGET. This concluded with the LMPs being discharged as originally submitted within the 56 day timeframe. In addition, NGET advised ESC that they are of the view that the identified issues are easily rectifiable given that only minor changes to the submitted SPR plan (affecting vegetation types and phasing in discrete areas) would be required to address them, being very minor alterations to vegetation species and phasing. NGET advised that 'These adjustments are primarily related to which species of vegetation are planted where, in discrete areas of a wider masterplan that would remain largely unchanged, and how advanced planting in these areas is phased'. NGET acknowledged that 'the changes required would not be material or conflict with the landscaping principles shared and discussed with ESC or neighbours to date' Should Sea Link gain consent from the Secretary of State, given the minor non-material nature of any such changes to SPR's proposed landscaping, ESC concluded that Requirement 40 of the SPR EA1N and EA2 DCOs would appear to provide the correct mechanism to address any such changes that may be brought forward by SPR to accommodate future projects, such as Sea Link. ESC understands that SPR is prepared to continue to engage with NGET in relation to Sea Link and NGV in relation to the LionLink project. ESC fully endorses and encourages proactive collaborative working to avoid and or minimize any associated impacts on local communities. ESC did not however accept NGET's R14(1) objection statement that if ESC were to discharge R14(1) in its current form, that this 'would involve ESC frustrating the coordinated approach which ESC itself has specifically advocated for.' ESC made it clear to NGET that such a statement is both patently incorrect and in the context of ESC's wish that the parties adopt a co-ordinated and collaborative approach, extremely unhelpful. On the basis of information available at Deadline 7, this matter currently remains 'not agreed'. However, ESC expects the Applicant to engage in discussions, including with ESC and the promoters of other projects in East Suffolk, beyond the Examination, and subject to the progress of these discussions, there is potential for agreement to be reached on this matter.		

Table 3.12 Draft Development Consent Order

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.12.1	**N/A**	Schedule 1	ESC previously advised that wording is required in the dDCO to remove National Grid's right to carry out works, "without the prior approval of the relevant planning authority", where SPR has already carried out the works. ESC is satisfied that Requirement 15 provides adequate controls in this regard.	The Applicant notes that Requirement 15 already imposes a restriction on carrying out works to Work 1B where the works are completed pursuant to another DCO. Therefore, additional wording is not necessary.	Agreed
3.12.2	**N/A**	Article 1 definitions	The current definition of maintain is unnecessarily broad and if it is to remain, the given activities must be further defined otherwise the Applicant will effectively have been given carte blanche. In addition, ESC requires wording to be inserted in the dDCO so as to require the Applicant to serve written notice on the relevant planning authority prior to the commencement any "material" maintenance works (i.e. those that are likely to cause disturbance etc.). **Article 2 (1) (Interpretation)** To be amended as follows – "maintain" includes inspect, upkeep, repair, adjust, alter, dismantle, clear, refurbish, ~~paint~~, surface treat, decommission, reconstruct or replace (but only in relation to any of the ancillary works in Part 2 of Schedule 1 (ancillary works) to the extent assessed in the environmental statement) and "maintenance" must be construed accordingly; The amended text in the above definition is based on the precedent established by the East Anglia TWO Order (2022/433) which it is considered has particular relevance to the Sea Link application bearing in mind also the Applicant's consistent reference to established precedent in other Orders. In addition, the words "remove", "improve" and "paint" have been deleted in that the works involved need first to be approved by the relevant planning authority. It is in order to accommodate this exigency that ESC also proposes an amendment to Article 4 as highlighted in the 'Art. 4 row' below.	The definition includes the ability to inspect, repair, adjust, alter, dismantle, remove, clear, refurbish, paint, surface treat, decommission, improve, reconstruct or replace any part of the authorised project but does not allow for the removal, reconstruction or replacement of the whole of the authorised project. The Applicant requires the flexibility to maintain the assets and all the activities listed within the definition are conventional and have been assessed within the Environmental Statement. The definition is well-precedented across other nationally significant infrastructure projects and takes into account the range of works that the Applicant may reasonably need to carry out over the lifetime of the authorised development to ensure a safe and efficient connection. The Order restricts this definition such that the ability to maintain does not vary the scheme beyond the definition of the authorised development. The Applicant disagrees that the proposed amendments are proportionate or necessary or that the definition is too broad as set out in **Application Document 9.150 Applicant's Comments on Other Submissions Received at Deadline 6** submitted at Deadline 7. In terms of whether written notice should be served on the planning authority prior to the commencement of any 'material maintenance works', the Applicant does not consider that this is necessary. The context in which the Applicant can (or is required to) maintain is set out in the relevant article and would already be authorised by the powers under the Order.	Not agreed
3.12.3	**N/A**	Art.2(1) "pre-commencement operations"	ESC notes that 'pre-commencement operations' are described in the Explanatory Memorandum as operations that are "either de minimis or [having] minimal potential for adverse impacts". The current list in the DCO is substantial and includes activities that may have more than minimal effects and do not appear to be de minimis. Further clarification is required and ESC is certainly not prepared to rely, going forward, on the general wording offered in the Explanatory Memorandum.	The Applicant notes that the pre-commencement operations will be controlled by the outline management plans which are listed within Requirement 6. The Applicant recognises that there is a natural tension between discharging the requirements to 'commence' under the Order and the programme constraints which require pre-commencement. The Applicant has reviewed the list of pre-commencement operations and considers that the right balance has been struck.	Not agreed

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			Additionally, ESC queries whether demolition of buildings should be included as a pre-commencement activity. ESC also raises the question if this should include the erection of temporary buildings and structures. ESC questions what is meant by 'site clearance' and if this means the removal of trees, hedgerows and scrubs, or ground works and should this also include site preparation works. ESC questions what 'set up works associated with the establishment of construction compounds' includes. ESC requests that 'environmental mitigation measures' should be defined within article 2. ESC raises concern over the construction of compounds without any LPA involvement as a pre-commencement condition, as construction compounds can be significant and potentially requiring elements like drainage. ESC requests that further discussion on temporary accesses is needed. A new temporary construction access can be significant and can require associated elements like drainage. ESC requests that 'early planting of landscaping works' is added to the list of pre-commencement operations and that a requirement be added to Schedule 3 that requires that 'pre-commencement operations' cannot be carried out until details of advance planting are approved with a timetable for their implementation.	Site setup works for construction compounds would involve the removal and storage of top soil and sub soil to create the level area for the compound. This would be followed by the import of stone to provide a suitable laydown area, including the installation of any services required and drainage. Following the completion of the stone layer , there may be the installation of tarmac for permanent areas of vehicle movements and parking, the installation of cabins and welfare facilities , any fencing , lighting and security requirements.	
3.12.4	**N/A**	Art 2	ESC notes that "temporary construction works" is defined as meaning "any of the temporary construction works described in Schedule 1 (authorised development) to the Order". However, Schedule 1 does not appear to identify clearly which works are in fact only "temporary". ESC suggests that the definition of "temporary construction works" in Art 2(1) of the dDCO is amended as follows (changes shown in bold): "temporary construction works" means any of the temporary construction works described as "temporary" in Schedule 1 (authorised development) to the Order". Schedule 1 should be reviewed to ensure that it sufficiently identifies all such "temporary" works. ESC notes that, as currently drafted, Schedule 1 identifies the following works (in East Suffolk only) as temporary: • Work No 4 – Suffolk temporary work compounds; - - - - • 'temporary work areas and laydown areas' - in Work Nos. 1B (c), 2(b), 3A(c), 3B(b), 5(b), 6(a); • 'utility service connections for electricity, telecommunications and potable water and/or	The definition of 'temporary construction works' is used in the Order in the context of Article 8 only, which refers to the application of the 1990 Act. An amendment to a definition is only relevant to the extent that it is used operationally within the Order. On that basis, an amendment to the definition is not necessary. The Applicant does not believe that this temporal separation is necessary, nor is it clear as to what it would achieve. The DCO authorises the works set out in Schedule 1, to meet the Proposed Project need. The principal works (e.g. substation, converter station, cables, OHL) would be permanent (for the lifetime of the Proposed Project), but facilitated by temporary activities (such as construction, maintenance). All activities have been assessed and are mitigated and controlled as appropriate	Not agreed

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			connection of power supply made from temporary generators' in Work Nos. 1B (y), 2(l), 3B(u); • 'trenchless crossing(s) including an entry/exit pit and associated temporary construction compounds' - in Work Nos. 5(g), 6(c) and (d); and 'temporary work areas for vessels to carry out intrusive and non-intrusive activities' - in Work Nos. 6(e). The Applicant's response in this SoCG fails to answer ESC's concern and questions. The wording of the DCO should be clarified as requested by ESC; the DCO is not meant to provide a promoter with inherent flexibility to do what it wants.		
3.12.5	**N/A**	Art 4	ESC also proposes the following amendments to Article 4: **Article 4 (Maintenance of authorised project)** 4.—(1) The undertaker may at any time maintain the authorised project, except to the extent that this Order, or an agreement made under this Order, provides otherwise. (2) The power to maintain conferred under paragraph (1) does not relieve the undertaker of any requirement to obtain any further licence under Part 4 of the 2009 Act (marine licensing) for offshore works not covered by the deemed marine licence. (3) The undertaker must give 28 days' notice in writing to the relevant planning authority prior to the commencement of any maintenance works which may give rise to effects or impacts not assessed in the Environmental Statement and those works must not be undertaken unless the relevant planning authority has confirmed in writing that it has no objection to such works.	The Applicant does not consider that the additional proposed wording requiring written notice to be served on the planning authority prior to the commencement of any maintenance works is necessary. The context in which the Applicant can (or is required to) maintain is set out in the relevant article and such powers would already be authorised by the powers under the Order.	Not agreed
3.12.6	**N/A**	Art 5	ESC queries the acceptability of a 6 m limit of deviation for pylons, and requests that clarification should be made and justification for this figure provided, and this deviation reduced. ESC recommends that the wording of Article 5 is amended to provide for the addition of the following wording within the 'Table of Parameters' at Paragraph (3)(b) – • Work: '3A (a)' • Type of structure: 'Access bridge over River Fromus' • Height: '[X]m above finished ground level' ESC acknowledges that Article 5 (Limits of Deviation) includes maximum height parameters, and the Works Plans show non-linear limits of deviation. However, ESC considers that other aspects, such as maximum footprints, must be controlled under the DCO; the requirement in Article 5(3)(a) for works 'to be carried	The Applicant notes that the 6 m limit of deviation relates to the standard 3 m panel typically used to construct a tower. The Applicant does not agree that this deviation should be reduced as the flexibility to use either one or two panels is intended to provide a necessary but proportionate degree of flexibility in the construction of the authorised development and to reduce risk. The Applicant has included the footprint of the operational fenced compound related to the substation under Work No. 1B into Article 5 of the draft DCO. The Applicant considers that securing the limits of deviation pursuant to the Works Plans, which are certified documents, is appropriate, and is the approach taken on other nationally significant infrastructure projects granted by the Secretary of State. Further reductions in flexibility would not meet the tests for requirements to be imposed under paragraph 4.1.16 of NPS EN-1 as it would not be necessary or reasonable; the full limits of deviation have been assessed in the Environmental Statement and reductions in horizontal flexibility would not reduce significant effects.	Not agreed

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			out within any applicable non-linear limits of deviation shown on the Works Plans' is not sufficient.		
3.12.7	**N/A**	Art 7	ESC requests a requirement for the relevant planning authority to be given 56 days to make representations in relation to any transfer or grant made under Article 7 (Consent to transfer benefit of order). ESC suggests that a new paragraph (7) is inserted in Article 7 as follows – (6) The undertaker must give the relevant planning authority not less than 56 days' notice of its intention to transfer or grant to another person any or all of the benefit of the provisions of the Order.	Article 7 requires the undertaker to seek the consent of the Secretary of State to transfer the benefit of the Order. Therefore, this is a matter for the Secretary of State to determine and it will be for the Secretary of State to consult the relevant planning authority if felt appropriate.	Not agreed
3.12.8	**N/A**	Art 10	ESC notes that discussions are ongoing with the Applicant regarding the wording of Article 10. ESC reserves its position as to both the need for Article 10 and whether it is acceptable in law. ESC notes that, following discussions between the Councils, SCC submitted proposed updated Article 10 wording in response to ExQ3 3GEN17 at Deadline 6 [REP6-276]. ESC is supportive of this proposed wording.	The Applicant notes this comment and welcomes the provision of wording by the authorities. The Applicant has provided its comments in respect of this article within **Document 9.153 Applicant's Response to Rule 17 Letter** submitted at Deadline 7.	Not agreed
3.12.9	**N/A**	Art 21	ESC is of the view that in circumstances where notice must be given, 14 days is too short a period of time. It is entirely reasonable for the Applicant to be required to provide 28 days' notice.	Article 21 sets out the circumstances in which protective works can be carried out to land, buildings, structures, apparatus or equipment, within the Order limits or which may be affected by the authorised project. If there is a need to prevent damage to a building, there will be a clear need to carry out the works relatively quickly. The Applicant considers that 14 days is an appropriate timescale and is proportionate in the context of preventing damage or remedying damage. In any event, the Applicant would typically seek to carry out works by voluntary agreement. The article provides that the undertaker must compensate the owners and occupiers of any land, building, structure, apparatus or equipment, in relation to which rights under the article have been exercised, for any loss or damage arising to them by reason of the exercise of those rights.	Not agreed
3.12.10	**N/A**	Art 27	ESC questions why Article 27(2) prescribes a 14-day notice period for the temporary use of land for carrying out the authorised project, whilst Article 28(3) prescribes a 28-day notice period for the temporary use of land for maintaining the authorised project. These should be made consistent by increasing the 14-day notice period for Article 27(2) to a more appropriate 28-day notice period. The Applicant's response in this SoCG is not accepted. There is no justification for two different periods of time.	Article 27 (Temporary use of land for carrying out the authorised project) allows the Order land and the land set out in Schedule 11 to be occupied temporarily by the undertaker in connection with the carrying out of the authorised project. Article 27(2) requires 14 days' notice to be given before entering on and taking temporary possession of land under this article, the undertaker must serve notice of the intended entry on the owners and occupiers of the land. Article 28(3) (Temporary use of land for maintaining authorised project) requires that no less than 28 days before entering upon	Not agreed

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			In addition, the fact that the provision may have been precedented elsewhere is of no relevance to the current projects and the issues that ESC face. Comments on Article 27 are also provided in the 'Schedule 3: Requirement 9, and Article 27 (Temporary use of land for carrying out the authorised project)' row below	and taking temporary possession of land under this article the undertaker must serve notice of the intended entry on the owners and occupiers of the land and that notice must explain the purpose for which entry is taken, except as provided in paragraph (11). The time periods are necessarily different as the articles serve different purposes. Article 28 relates to the maintenance period and at this stage, the Applicant should have secured the ability to carry out maintenance by virtue of land rights using its compulsory acquisition powers, outside of the DCO powers. Therefore, the Order power is intended as a fall-back position to carry out any maintenance within the first 5 years. In the context of maintenance, 28 days in an appropriate timescale. However, Article 27 is a crucial power that will be exercised in the construction of the authorised project. It operates within an entirely different context to article 28 and the 14-day timeframe is considered to be necessary, appropriate and proportionate given the need for the Applicant to construct the authorised project to meet the needs case. In reality, the Applicant will be liable for compensation under this Article where compensation would be payable and so landowners will be given as much notice as is possible. However, it is essential that the programme can be adhered to. It is not correct that precedent is not relevant. Whilst clearly every project is different and turns on its own issues and local context, there is considerable value in understanding the approach taken by the Secretary of State on nationally significant infrastructure projects and critical national priority projects, particularly around established standard order drafting points which stem from the model provisions.	
3.12.11	**N/A**	Art 49	ESC requests that Art 49(1)(a)(iii), 49(1)(a)(iv) and 49(1)(b)(ii) are amended to provide that the demonstration that the nuisance cannot 'reasonably be avoided' be demonstrated to 'the relevant planning authority's reasonable satisfaction'. There is precedent for this in the Sizewell C DCO, which provides that the no enforcement action may be taken in relation to statutory nuisance where this 'is a consequence of the construction, maintenance or operation of the authorised development and that it cannot, to the reasonable satisfaction of East Suffolk Council reasonably be avoided'. This is particularly important in light of ESC's concerns regarding the broad scope of the definition of "maintenance" in the draft DCO. ESC also queries the inclusion of Art 49(1)(a)(iv) and considers that it may provide the undertaker with great scope for the application of Article 49. ESC requests that the Applicant provides justification for this inclusion, including examples of instances where this provision would apply.	Article 49 relates to civil claims for statutory nuisance claims under the Environmental Protection Act 1990 which can be brought against the undertaker in respect of noise or light effects. The Applicant does not consider that the suggested wording for inclusion is appropriate. The suggested wording would require that in a case brought for statutory nuisance by a third party, any defence in front of a tribunal or court would have to seek input from ESC for some kind of approval that it cannot be reasonably be avoided. The wording suggested by ESC is entirely inappropriate in this case and is not well-precedented beyond their sole example of Sizewell C, which is a very different project.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			The Applicant's response is not accepted. ESC's proposed wording is entirely appropriate and the fact that the Applicant is attempting to avoid such a provision merely endorses ESC's view. ESC has also requested that Article 49(1)(b)(i) be amended to refer to an operational noise limit DCO Requirement (proposed wording for which has most recently been provided by ESC at Deadline 6 in response to ISH3 Action Point 1 [REP6-161]), rather than the Construction Noise and Vibration Management Plan, as this contains no operational noise controls and so is not relevant to the use of the authorised development. Despite the ExA querying this in its ExQ2 Question 2GEN13, ESC notes that no amendments were made to Article 49 at Deadline 5. Amendments were subsequently made at Deadline 6 [REP6-004] such that Article 49(1)(b)(i) makes reference *'measures contained within the Register of Environmental Actions and Commitments'*, in light of operational noise limits being inserted into the REAC. As ESC has stated, the Applicant must propose an operational noise limit DCO Requirement, rather than securing operational noise controls in the REAC, and then make reference to this Requirement in Article 49.		
3.12.12	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7	Art 51	In regard to felling and lopping, ESC has stated that clarification on the definition of 'near' is necessary. ESC considers it appropriate for a consent mechanism to be included here for felling trees outside the order limits. The response provided to date is insufficient. The word "*near*" should be defined in Article 51 – "*near*" means within X metres of the authorised development". ESC requests amendments to Article 51 such that it does not apply to veteran trees that have been identified and understood to be preserved in situ for the project. The Applicant's reference to earlier DCOs is inappropriate; every DCO must be drafted based on what is being proposed for that particular project.	The Applicant has re-considered this point and still does not consider that it would be appropriate to include a distance, which would be an arbitrary number. Whilst there is no precise definition of 'near' in the draft Order, the power in Article 51 (1) (felling or lopping) is limited and may only be exercised for the specific statutory purpose(s) set out, namely to prevent an obstruction or interference with the construction, maintenance or operation of the 'authorised development' (as defined) or any apparatus used in connection with it, or to remove or prevent a danger to persons constructing, operating or maintaining the same. The Applicant recognises these concerns and has discussed these with ESC. However, the Applicant maintains that the drafting is necessary and appropriate for the reasons previously set out within **Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**. The current drafting is based on established wording with considerable precedent at Article 47 of the (Bramford to Twinstead Reinforcement) Order 2024, Article 81 (1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 35 (1) of the Norfolk Boreas Offshore Wind Farm Order 2021, and Article 32 (1) of the Cleve Hill Solar Park Order 2022. None of these Orders included a definition of 'near'. It is not correct to suggest that precedent is not relevant. Whilst clearly every project is different and turns on its own issues and local context, there is considerable value in understanding the approach taken by the Secretary of State on nationally significant infrastructure projects and critical national priority projects, particularly around established standard order drafting points	Not agreed

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				which stem from the model provisions. It is noted that ESC frequently insists that the Applicant should accept all parameters, approaches, commitments and requirements imposed on two offshore wind farms, EA1N and EA2, even where the measures are wholly irrelevant or unnecessary for the Proposed Project. It is appropriate that the Applicant sets out its precedents in response.	
3.12.13	**Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**	Art 55	Notwithstanding and subject to ESC's outstanding objections to the deeming provisions in the dDCO, ESC considers that such provisions address any instances of decisions being 'unreasonably delayed'. ESC also considers that the wording 'unreasonably withheld' is inappropriate and unnecessary and would not provide the Applicant with any additional protections, as an arbiter would be needed to determine whether a decision has indeed been 'unreasonably withheld', and such provisions are already made in Article 62 (Arbitration), and in the case of requirements, via the appeals process in Article 54(4). ESC therefore considers that the wording 'unreasonably withheld or delayed' should be deleted.	The Applicant has accepted the recommendation of the ExA in its Schedule of Changes to the draft Development Consent Order [PD-024] and has amended the draft DCO to remove this wording. The Applicant considers that this should resolve this matter.	Not agreed
3.12.14	**N/A**	Art 56	Safeguarding: ESC considers that the appropriate mechanism is for the Applicant to set up notifications for planning applications using the Council's Public Access planning service, freely available. ESC does not provide a "private" service for any other developer and is not prepared to create an administrative precedent in so doing. Notwithstanding this, the ESC requires the wording "sent the notice to the undertaker by first class post" be deleted as notice is sent via email, and not by post. National Grid should also supply details of who the notice should be sent to. ESC requires clarification on what is meant by 'alteration' in 56(8)(a)(i) and what constitutes an alteration. ESC queries Article 56(6), which states that 'the requirement to consult under this article is a local land charge'.	The Applicant considers that the safeguarding provision is an important one in the context of a project for which there is a critical national priority. Article 56(3)(b) states that the notification may be provided "by such other means of service as may be agreed with the relevant planning authority". This makes clear that details can be dealt with by agreeing to use email. Paragraph (6) makes the requirement to consult a local land charge. The result is that in the ordinary course of the early stages of handling an application for planning permission the existence of this provision will become readily apparent to all concerned. It is standard practice for Safeguarding Directions to be revealed in response to Optional Enquiries sent with requisitions for searches of the local land charges register; the approach taken in this Order takes advantage of the Order's status as a statutory provision for the purpose of section 1(1)(e) of the Local Land Charges Act 1975 (see the definition in section 14(1)). This should avoid any undue administrative burden.	Not agreed
3.12.15	**N/A**	Schedule 3: Requirements - General	ESC is content to be the discharging authority for all discharge of requirements for the Suffolk Onshore Scheme, save for Requirement 7(3), and Requirement 12, for which SCC as the relevant highway authority is the discharging authority. Appendix B to the Explanatory Memorandum provides clarity in relation to who the discharging authority will be for the approval of the management plans listed in Requirement 6. This states that ESC would be the discharging authority for all Suffolk plans, other than the Construction Traffic Management Plan – Suffolk, the Public Rights of Way Management Plan – Suffolk, the Drainage Management Plan – Suffolk, and the Flood Management Plan, for	The Applicant is including a schedule within the DCO to be submitted at Deadline 7 to set out the discharging authorities for the requirements and management plans. When discharging final management plans the Applicant is able to do so in stages, with those stages defined by the programme submitted under Requirement 4. This enables the efficient delivery of infrastructure projects as it means construction can start on one element of the project whilst detailed design is completed in another; but also provides an effective mechanism for the Applicant to manage discharge of management plans on cross	Not agreed

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			which SCC would be the discharging authority. ESC considers that SCC should also be the discharging authority for the Materials and Waste Management Plan, noting that SCC requested this itself in Paragraph 15.45 of its LIR [REP1-130]. ESC considers that further clarification as to the relevant discharging authorities should also be provided in the wording of Requirement 6 of the draft DCO itself. ESC would also welcome the provision of further clarification regarding who the discharging authorities would be for all other Requirements of the draft DCO. Additionally, ESC queries how the discharge of Requirement 6 process will operate where there are multiple discharging authorities for a single plan (for example, the Onshore CEMP, Code of Construction Practice, and Material and Waste Management Plan, for which ESC is one of three discharging authorities), and would welcome clarification from the Applicant. ESC acknowledges that the Applicant has suggested that information submitted at Deadline 7 could address ESC's concerns but given this has not been formally submitted into the Examination at the time of writing and ESC have not been able to review it, this matter remains 'not agreed'.	boundary projects. Whilst the Applicant has not yet developed the stages for the Proposed Project, it is highly likely that stages would be split by discharging authority such that, for example, the final plans would comprise an Onshore CEMP: Suffolk and an Onshore CEMP: Kent. This is currently the Applicant's intended approach. An alternative mechanism available on projects that span local authority areas is to develop a single document and have that document approved by all relevant discharging authorities. This can become complex if relevant discharging authorities disagree on final measures, but can work well for plans that are unlikely to vary significantly across areas. It should be noted that the Code of Construction Practice is no longer a document that is part of the Application, with measures formerly within it split between other documents, particularly the CEMPs and the REAC. On 23 April 2026, the Applicant also shared with ESC a document issued to the Planning Inspectorate as a response to the Fingleton Review that proposed the introduction of a change of wording that would enable requirements to be discharged by a new department in DESNZ, following consultation with relevant planning authorities. The Applicant also left messages with ESC officers to discuss this change and offered the same by email, but the offer was not accepted due to resourcing challenges in the lead up to Deadline 7. The Applicant hopes this addresses ESC's concerns.The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	
3.12.16	**N/A**	Schedule 3: Requirements - General	Management Plans to be Approved ESC previously noted that the list of management plans does not include a lighting management plan. ESC considers it necessary for an outline lighting management plan to be prepared, and for a detailed Lighting Management Plan to be approved by the relevant planning authority post-consent, which it suggested could be through a discharge of Requirement 6. This would ensure that the operational lighting is able to respond to any site-specific technical requirements and reflect the most up-to-date best practice. Such requirements are commonplace. For example, Requirement 25 ('Control of artificial light emissions during operational phase') of The East Anglia ONE North Offshore Wind Farm Order 2022 and The East Anglia TWO Offshore Wind Farm Order 2022 allows the relevant planning authority to approve details of artificial light emissions, including measures to minimise lighting pollution and the hours of lighting. ESC therefore welcomes the addition of paragraphs (4) and (5) to Requirement 3 of the draft DCO submitted at Deadline 6 [REP6-	The Applicant has amended the DCO to include provision for an operational lighting plan to be submitted to and approved by the relevant planning authority and has submitted an outline operational lighting plan into the Examination.	Agreed

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			004], which requires that operational lighting for Work Nos. 3B, 9B and 11 (and 1B where the substation is constructed under the Sea Link DCO) must not be installed until an operational lighting plan is submitted to and approved by the relevant planning authority. ESC is currently reviewing the outline operational lighting management plan and will comment on this at Deadline 7.		
3.12.17	**N/A**	Schedule 3: Req 1 definitions	ESC is of the view that sub-para. (f) – "general site maintenance" is unhelpfully broad and could as a consequence include a range of activities that would create a disturbance before the working hours. This definition needs revision and further discussion.	The Applicant considers that the robust controls in the management documents are sufficient and a noise limit will apply at the nearest noise-sensitive receptor for start up and close down activities, which includes general site maintenance. The Applicant's position is as set out in the draft DCO at Deadline 7.	Not agreed
3.12.18	**N/A**	Schedule 3: Req 3	Detailed Design ESC, in collaboration with SCC, has proposed revised wording for Requirement 3 of the draft DCO which can be found in ESC's response to ExQ3 3GEN8 [REP6-261]. ESC notes that the Applicant has amended Requirement 3(3) (Detailed Design, Bridge over the River Fromus) of the draft DCO at Deadline 6 to read: *'Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the design of the bridge have been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency.'* This has removed the requirement that details of the layout and scale of the bridge have to be submitted to the relevant planning authority. Layout and scale should be reintroduced into Requirement 3(3). Given ESC's concerns (as set out in the Table 3.3) that the 4m soffit height above the Q95 level is not secured as a maximum height in Requirement 3 and that ESC's control over layout and scale have been removed, whilst ESC acknowledges that the current drafting of Requirement 3 is a significant improvement on previous iterations, ESC is not wholly satisfied. ESC acknowledges that the Applicant has suggested that information submitted at Deadline 7 could address ESC's concerns but given this has not been formally submitted into the Examination at the time of writing and ESC have not been able to review it, this matter remains 'not agreed'.	The Applicant further amended Requirement 3(3) at Deadline 7 to specify that the 'design, layout, scale and external appearance' of the bridge are to be approved. The Applicant had intended the word 'design' to be a holistic term to mean these aspects of the bridge as the layout, scale and external appearance are part of the design. However, the wording has been amended to make this explicit in line with ESC's request in the hope this could now be agreed. The final wording of Requirement 3(3) submitted at Deadline 7 states: '*(3) Bridge over the River Fromus* *(a) Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the design, layout, scale and external appearance of the bridge have been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency and Suffolk County Council.* *(b) The bridge over the River Fromus should be designed in accordance with the following parameters:* *(i) the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow level);* *(ii) abutments for the bridge shall be set back no less than 8m from the top of the bank; and* *(iii) the bridge shall not have a deck width greater than 6m.* *(c) The design details submitted under (a) must be accompanied by a technical statement demonstrating how, recognising the minimum size parameters in sub-paragraph (b)(i) and (ii), the Applicant has sought to reduce the scale of the bridge, having and achieve good design in accordance with paragraphs 4.7.1 to 4.7.8 of the Overarching National Policy Statement for Energy (EN-1, 2023). In achieving these aims, the Applicant will have regard to*	Not agreed

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				the relationship with the landscape mitigation proposals, the articulation of the spanning structure, the design of the abutment walls, and the design of the parapet railings. The technical statement will include a plan, elevation and section drawings, and 3D renders of the bridge design in key view VP02 and CH02. *(d) Should the bridge design comprise a soffit height of less 12.49 m Above Ordnance Datum (approximately 6m above the Q95 flow level), then development of the bridge must not commence until a macro invertebrate monitoring and contingency plan has been submitted to and approved by the relevant planning authority, following consultation with the Environment Agency. The invertebrate monitoring and contingency plan must include:* *(i) The requirement to carry out Water Framework Directive compliant surveys twice yearly (spring and autumn), upstream and downstream of the Fromus crossing for a period of five years following completion of the construction of the Fromus crossing.* *(ii) Principles of the contingency monetary fund set out in (e) and criteria for when provision of the fund would be triggered.* *(e) Following receipt and review of the monitoring results under (d)(i), should the criteria in (d)(ii) be exceeded, then a contingency fund would be provided to fund measures to encourage the passage of macro invertebrates around the Fromus crossing and/or enhancement of Water Framework Directive invertebrate habitat upstream of the Fromus crossing. This would be secured via an appropriate legal agreement.* *(f) The development shall be carried out in accordance with the details approved by the relevant planning authority further to sub-paragraph (3)(a).* The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	
3.12.19	**N/A**	Schedule 3: Req 4	Stages of the Authorised Development Part (4) of Sub-paragraph 4 of Requirement 4 states that notification of completion of construction of each stage of the authorised development must be provided within 28 days of the event completing. ESC considers that a 28-day notice period should also be required for the service on ESC of written notice setting out the anticipated programme for the carrying out of pre-commencement operations. The 7-day notice period prescribed in in paragraph 1 of Requirement 4 is not adequate. ESC acknowledges that the Applicant has suggested that information submitted at Deadline 7 could address ESC's concerns but given this has not been formally submitted into the	The Applicant has agreed to this change, Requirement 4(1) now states that 28 days notice should be provided in the draft DCO submitted at Deadline 7. The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	Not agreed

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			Examination at the time of writing and ESC have not been able to review it, this matter remains 'not agreed'.		
3.12.20	**N/A**	Schedule 3: Req 4	Stages of the Authorised Development ESC asks that sub-paragraphs (3) and (4) be amended so as to require the Applicant to secure the prior written approval by the relevant planning authority of all written schemes, and any revisions to these. There is precedent for this in the EA1N and EA2 DCOs.	The scheme setting out the stages of the authorised development is informed by the Contractor and construction programme. The Applicant does not consider that it is appropriate for such a document to be approved by the local planning authority.	Not agreed
3.12.21	**N/A**	Schedule 3: Req 5 and 6 management plans	ESC has previously raised concerns regarding whether the management plans etc. secured by Requirement 5 of the draft DCO will bite on the pre commencement operations, given there was no reference to commencement in the wording in Requirement 5. ESC welcomes the clarity provided by the Applicant in this regard in Requirement 5. ESC also welcomes the Applicant's amendments to Requirements 5 and 6 to confirm that they cover not only the construction phase, but also the operational and maintenance periods. ESC is now content with the wording of Requirements 5 and 6 in this regard.	Requirement 5(3) confirms that for the avoidance of doubt, the pre-commencement operations must be carried out in accordance with the plans in listed in Requirement 5 and the outline plans within Requirement 6. The Applicant has amended the draft DCO to refer to 'the authorised development' rather than works forming part of the authorised development to provide further clarity.	Agreed
3.12.22	**N/A**	Schedule 3: Req 5 and 6 management plans	There is no requirement relevant to fencing and other means of enclosure, ESC considers it appropriate for one to be included. For reference see Requirement 17 of the ScottishPower Renewables East Anglia One North and East Anglia Two DCOs. ESC has provided its suggested wording for a fencing requirement in response to ExQ2 Question 2LVIA8, and more recently in response to ISH3 Action Point 1 [REP6-161].	The Applicant does not agree that a requirement relevant to fencing is necessary. It is noteworthy on this point that the Applicant must deliver fencing around substations and converter stations in line with strict requirements on height, materials and design; and the Applicant themselves has no ability to vary these parameters. Therefore, any input from relevant planning authorities could not be considered, rendering any approvals process unnecessary and without merit. This has been discussed on a large number of occasions with ESC.	Not agreed
3.12.23	**Application Document 9.84 (E) Register of Environmental Actions and Commitments** submitted at Deadline 7	Schedule 3: Req 5 and 6 management plans	There is no requirement for emergency planning arrangements (other DCOs have secured this – Requirement 6 of the Sizewell C DCO, Requirement 33 of the East Anglia One North and East Anglia Two DCOs). ESC acknowledges that the Applicant has suggested that information submitted at Deadline 7 could address ESC's concerns but given this has not been formally submitted into the Examination at the time of writing and ESC have not been able to review it, this matter remains 'not agreed'.	The Applicant has provided a commitment (GG41) within **Application Document 9.84 (E) Register of Environmental Actions and Commitments** submitted at Deadline 7, to submit an Emergency Radiation Plan. The Applicant has included a new requirement in the DCO to be submitted at Deadline 7 to cover emergency planning arrangements. The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	Not agreed
3.12.24	**N/A**	Schedule 3: Req 5 and 6 management plans	There is no requirement controlling operational noise. Requirement 27 of the East Anglia One North and East Anglia Two DCOs secures this, and these limits and controls should be replicated by the Proposed Project's DCO for the Friston substation. ESC has provided its suggested wording for an operational noise DCO requirement, most recently at Deadline 6	As discussed above, operational noise is controlled by enforceable mechanisms in the REAC, secured by Requirement 5; the exact content of SPR's requirements cannot be replicated (as they apply to noise levels at two substations over which the Applicant has no control and will create more noise than Friston	Not agreed

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			in response to ISH3 Action Point 1 [REP6-161]). Further detail of this request is provided in Table 3.3 above.	Substation), but the Applicant has incorporated strict noise limits in REAC commitments that enable SPR's commitments to be met.	
3.12.25	**N/A**	Schedule 3: Req 6	ESC acknowledges the additional paragraphs (3) and (4) of Requirement 6 concerning landscaping works. ESC welcomes these additions, noting that the wording is comparable to Requirement 15 of the East Anglia ONE North and East Anglia TWO DCOs. However, ESC requests that additional wording is included in paragraph (4) to confirm that any replacement planting will also be subject to the same monitoring and maintenance period as the original planting. ESC suggests that the following amendments to paragraph (4) of Requirement 6 are adopted (amendments shown in red): *'(4) Any tree or shrub planted as part of an approved Landscape and Ecological Management Plans that, within a period of five years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted unless alternative timing or a different specimen is otherwise approved by the relevant planning authority. Any replacement planting will be subject to the same management and monitoring arrangements (including management periods) as agreed for original planting through the approval of the Landscape and Ecological Management Plans under sub-paragraph (1).'*	The Applicant does not consider this addition to the requirement to be necessary because the oLEMPs have been updated specifically to address the issue of adaptive management in the establishment period.	Not agreed
3.12.26	**N/A**	Schedule 3: Req 7	Construction Hours Detailed comments on the proposed working hours are included in ESC's Local Impact Report and other Examination submissions, and also in Table 3.5 of this SoCG, and so are not repeated here. Furthermore, the items listed in sub-paragraph (4) are too wide in scope and effectively allow the applicant to continue working outside core hours in most situations, with the exception of emergency works where risk to life or property exist and a few other exceptions, such as security operations, that may be discussed with the applicant in due course, works must be restricted to the core hours unless approved by the RPA. Following this the Applicant has included 1 hour start up and close down either side of core hours, this does not appear to have been factored into assessments or mitigation and is not accepted, it is effectively extending core hours by 2 hours a day and with the current inclusion of Saturday afternoons, Sundays and Bank Holidays is unacceptable. Whilst ESC maintains its concerns regarding the inclusion of 'general site maintenance' in the definition of 'start-up and close down activities' as noted above, ESC welcomes, in principle, a	The Applicant disagrees that the list of exceptions are too wide, they are exceptions that are all necessary and proportionate; it is simply incorrect that exceptions apply to 'most situations'. Start up and close activities are tightly defined in the draft DCO Schedule 3(1) and do not involve main construction activities. They do not represent an extension of core hours. However, these periods do enable the Applicant to bring personnel onto site outside core hours, which is beneficial for further reducing traffic during periods of higher traffic. It also enables, for example, a manager to attend site and carry out safety checks before personnel arrive on site, which is beneficial from a safety perspective and to enable works to start efficiently during core working hours. Requirement 7(5) also incorporates a noise limit for close down and start up activities as previously requested by ESC and recognised in the response. The Applicant does not consider a lower noise level to be necessary, although given the description of activities, in all likelihood noise levels would be much lower than this. On the Bramford to Twinstead application the local planning authorities requested reduced working hours as they are on the	Not agreed

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			noise limit for the start up and close down hours. However, Requirement 7 as currently drafted defines the 50dB noise 'limit' as a LOAEL. A LOAEL is not a noise limit, as it is the point at which impact must be mitigated and minimised. The LOAEL for construction should be the baseline noise level, whilst a noise limit should be expressed as a SOAEL, but it would be more appropriate to refer to the agreed standard (BS5228-1) rather than a policy term. ESC suggests the following wording for paragraph (5) of Requirement 7: (5) The core working hours referred to in sub-paragraph (1) exclude start-up and close down activities up to 1 hour either side of the core working hours. Start up and close down activities will be inaudible at the nearest noise sensitive receptor during these times. Where this cannot be reasonably met, justification must be provided to the relevant local planning authority, and as a fall back in accordance with the relevant BS5228-1 Category Threshold (Table E.1), a 50dBA noise limit (where Category B) and a 45dBA noise limit (where Category A) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours. The Bramford to Twinstead DCO contained a list of properties that had been identified as excluded from the working hours. This needs further discussion. Whilst ESC acknowledges that the Applicant has now excluded Bank Holidays from its core working hours for the Suffolk converter station (Work No. 3B), this simply does not go far enough. ESC requires Saturday afternoons, Sundays and Bank Holidays to be removed from the core working hours for all works other than those listed in Paragraph (4) of Requirement 7 (notwithstanding ESC's view that the scope of this paragraph is too wide). This is of critical importance to ESC and the communities it represents. The local community will only benefit from the respite afforded to it by other consented projects in the District (including EA1N and EA2) if all future projects also include these periods of respite.	Proposed Project. The team gave the response that this flexibility should not be limited without a good reason and asked the local planning authorities to suggest any areas of the project where reduced hours may be necessary because, for example, the noise levels would be high at a residential property. The exceptions in the Bramford and Twinstead Order were jointly arrived upon through close working with the local planning authorities, although there remained core disagreement over the working hours. On the Proposed Project the Applicant took exactly the same approach as it did on Bramford to Twinstead and has adopted the same working hours. However, on the Proposed Project ESC and SCC have not identified any areas of the Proposed Project where reduced hours should be required due to an environmental effect and has instead objected to the core hours on principle and using the somewhat imprecise term of 'respite' without defining who would be receiving respite from what. This is important particularly given that HGV movements and the noisiest activities that can be restricted (piling) are already limited to lesser working hours. Imposing a requirement such as reduced working hours must meet the tests in paragraph 4.1.6 of NPS EN-1; and a requirement cannot be necessary or reasonable where there is no clear rationale for it to be upheld. This is particularly in the context of a draft DCO that has adopted working hours that are standard on transmission projects and have been accepted on other DCOs led by the Applicant.	
3.12.27	**N/A**	Schedule 3: Requirement 9, and Article 27 (Temporary use of land for carrying out the authorised project)	ESC notes that the Applicant has amended Requirement 9(2) so that it no longer refers to the exclusion of the requirement to reinstate land for land 'above or within 10 metres of underground cables installed as part of the authorised development'. Article 27 was amended to include this exclusion for reinstatement of land where the undertaker would otherwise need to replant 'trees, shrubs, shrubberies or any other deep-rooted organism' above or within 10 metres of underground cables. ESC considered that this did not alleviate its concerns regarding habitat fragmentation due to leave large gaps being left in hedgerows where in proximity to buried cables, as 'shrubs' and 'shrubberies' are essentially hedgerows. ESC suggested that Article 27 should only refer to 'trees' in this respect, unless the Applicant can also	The Applicant amended the wording in Article 27 at Deadline 5 to remove reference to 'shrubs' and 'shrubberies'. Therefore, the Applicant considered that that amendment dealt with the outstanding concern raised by ESC but welcomes further discussion with ESC to resolve this issue (including the potential to restrict to trees).	Agreed

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			justify what 'deep-rooted organism' other than trees they may otherwise need to replant. ESC therefore welcomes the removal of 'shrubs', 'shrubberies' and 'any other deep-rooted organism' from Article 27(5).		
3.12.28	**N/A**	Schedule 3: Requirement 11	ESC requests that the Applicant provides justification for the 18-month timescale placed on the removal of any temporary bridge or culvert, from that part of the development being first brought into operational use. ESC considers that the Applicant should be required to remove within 6 months, or such longer period as may be agreed in writing by the relevant planning authority.	The 18-month period is to allow for any unforeseen environmental or landowner constraints on the removal works, enabling the works to be complete should seasonal restrictions apply. For example, within a recent survey project undertaken by the Applicant birds nested in a temporary bridge structure (whilst in use) resulting in delays to the removal works to wait for the birds to fledge and to suit the landowner in terms of undertaking the works in a break between harvests. 18 months is considered the worst-case scenario over which these constraints may apply.	Not agreed
3.12.29	**N/A**	Schedule 3: Requirement 13	ESC considers that the dDCO must include a substation decommissioning requirement to cover a scenario in which the Friston/Kiln Lane substation (Work No. 1B) is delivered under the Sea Link DCO, and to cover decommissioning of the Kent substation (Work No. 11). If the Friston/Kiln Lane substation is delivered under the Sea Link DCO, its decommissioning must be correspondingly authorised under the Sea Link DCO. The Applicant has stated, in response to ExQ1 1GEN54 [REP3-069] that it is appropriate to exclude the substations from this Requirement as they *'form part of the wider Transmission Network and therefore would be required to remain in operation even if the Proposed Project were to be decommissioned'*. The DCO application seeks the Secretary of State's approval for the "authorised development" as defined by Article 3 of the draft Order. The application does not contemplate or authorise a scenario where the substations could be used for a "wider transmission network" which at the present time is, therefore, purely speculative. To exclude the substations from the written scheme of decommissioning would be to pre-empt what should be a formal future process designed to protect the interests of the local community. For that reason, the substations must, in law, be included in the required written scheme of decommissioning and if at some time in the future the operator wishes to retain the substation, then it will have every opportunity to seek the relevant planning authority's approval for so doing. ESC considers this to be an entirely reasonable requirement. This requirement should have a 'bite' at cessation of operation which it currently does not. Wording should be introduced here to require notification be made to the local planning authority of cessation of operation, within 6 (or otherwise agreed) months of cessation occurring. ESC notes that it is necessary for the Proposed Project's DCO to make provision for decommissioning of landfall and subsequent monitoring. Similar provision is made in the East Anglia One North and East Anglia Two DCOs.	The Applicant's final position on decommissioning is set out in Reference 1.5 of **Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter** submitted at Deadline 7.	Not agreed

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			Requirement 37 of those DCOs requires 25 years of monitoring following decommissioning of relevant landfall works. Further discussion with ESC and the coastal management team is required. ESC understands that the Environment Agency are proposing a specific landfall decommissioning requirement. ESC supports the EA's concerns and will has provided the EA with feedback on its proposed wording submitted at Deadline 4 [REP4-185].		
3.12.30	**N/A**	Schedule 3: Additional requirement	ESC requests that a requirement comparable to Requirement 44 (Control of development during operational phase) of the EA1N and EA2 DCOs be added to the Sea Link draft DCO. This would ensure that Permitted Development rights are not used by the Applicant in a way that would undermine consented landscape and drainage mitigation. ESC proposes the following wording: *"Control of development during operational phase 16.-(1) During the operation of and within operational land related to Work Nos. 1B, 2, and 3B in the District of East Suffolk and Work Nos. 9A, 9B,10 and 11 in the District of Thanet and Dover, any development in addition to that authorised in this Order that is permitted under Schedule 2 Part 15 Class B (d), (e), or (f) of the General Permitted Development Order 2015 ("electricity undertakings permitted development) or any equivalent successor provision is subject to the following conditions - (2) In respect of operational drainage – (a) No electricity undertakings permitted development may commence until an amendment to the Drainage Management Plan approved pursuant to requirement 6 (o) in relation to Suffolk and requirement 6 (p) in relation to Kent that includes provision for the replacement of any existing drainage measures to be removed and maintenance of any new drainage measures to be provided as part of the permitted development, has been submitted to and approved by the relevant lead local flood authority, in consultation with the relevant planning authority and the Environment Agency; (b) The measures in the amendment to the operational drainage management plan in respect of the permitted development must be implemented as approved. (3) In respect of the provision, implementation and maintenance of landscaping – a) No electricity undertakings permitted development may commence until an amendment to the written Landscape and Ecological Management Plan and associated work programme approved pursuant to requirement 6 (f) in relation to Suffolk and requirement 6 (g) in relation to Kent that includes provision for the replacement of any existing landscape measures to be removed and maintenance of any landscape measures to be provided as part of the*	The Applicant remains of the view that there is no justification for a requirement based on Requirement 44 of EA1N and EA2 to be included in the Sea Link DCO that would interfere with National Grid's permitted development rights. The Applicant set out a detailed response to this suggested requirement in **Application Document 9.136 Applicant's Responses to Third Written Questions [REP6-111]** and **Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109].**	Not agreed

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			permitted development, has been submitted to and approved by the relevant planning authority; and (b) The measures in the amendment to the written landscape management plan and associated work programme plan in respect of the permitted development must be implemented as approved."		
3.12.31	**Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**	Schedule 4, para 1(1)	ESC strongly objects to the proposed 35-day determination period for the discharge of requirements and requests that Paragraph 1(1) is amended to prescribe a period of 56 days. ESC has given its detailed reasoning in several of its Examination submissions so will not repeat this exhaustively here. In summary, the EA1N and EA2 DCOs prescribe a 56 day determination period, and for the Sizewell C DCO prescribes a 56-day determination period where the discharging authority must consult with any other body (excluding SCC/ESC), and a 42-day determination period where there is no such requirement to consult. 35 days is therefore an unacceptably short determination period for ESC (as the discharging authority for the majority of the DCO requirements for the Suffolk Onshore Scheme) to rigorously scrutinise any discharge of requirement applications, many of which may be received by ESC simultaneously or in quick succession.	The Applicant recognises these concerns and has discussed these with ESC. However, the Applicant maintains that the timescales set out within the DCO are necessary and appropriate for the reasons previously set out within **Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**.	Not agreed
3.12.32	**Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**	Schedule 4, 1 (2)	ESC strongly objects to the deeming provisions in Paragraph 1(2) of Schedule 4, particularly given the short timescale of 35 days for determination. ESC has given its detailed reasoning in several of its Examination submissions so will not repeat this exhaustively here. DCO Requirements are a key mechanism for controlling the development, and deeming provisions for the discharge of requirements are not included in other DCOs within the East Suffolk District, with an appeals process prescribed instead for instances of non-determination within the decision period. ESC considers that the provision of an appeals mechanism would be more suitable. ESC notes that the Applicant has stated on numerous occasions, including in its comments on ESC's response to Question 1GEN28. of ExQ1 [REP4-083], that 'the deemed approvals provisions will only have effect where the application for consent, agreement and/or approval includes a clear statement that consent etc. must be provided within 35 days or else the consenting authority is deemed to have granted consent'. ESC cannot see how the draft DCO, as currently worded, allows for this implied 'waiving' of the deeming provisions at the Applicant's discretion. Schedule 4(1) clearly applies deemed approval provisions to all consents, agreements or approvals required by a Requirement (subject to sub paragraph (3) of Schedule 4(1)), with no requirement for this to be identified in the application itself. ESC rejects the Applicant's assertion that this provides any reassurance, noting that there is nothing to stop the Applicant applying deemed approval provisions to all	The Applicant recognises these concerns and has discussed these with ESC. However, the Applicant maintains that the timescales set out within the DCO are necessary and appropriate for the reasons previously set out within **Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**.	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			applications for consents, agreements or approvals required by a Requirement, ESC does not consider that the draft DCO in its current form provides for such a procedure.		
3.12.33	**Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085]**	Schedule 4: Paragraph 2	ESC considers that Paragraph 2(2) provides an unreasonably short timeframe (7 days) for requesting further information. In order to allow ESC to thoroughly scrutinise any discharge of requirement application it receives and ensure a robust determination process is conducted, ESC consults internal technical specialist officers on these applications. They are afforded the same 21-day consultation period as an external consultee, and this is essential to allow them sufficient time to scrutinise the proposals. This is particularly important given the number of NSIPs for which ESC is likely to be discharging requirements at the same time as Sea Link. ESC therefore suggests that Paragraph 2 of Schedule 4 should not differentiate between applications for which there is a requirement for external bodies to be consulted and those for which there is not. In either case, the relevant authority should be able to request further information up to 5 working days after the close of the 21-day consultation period. Paragraph 2(3) requires that the relevant authority notifies the undertaker where further information requested by a Requirement consultee 'within 5 days of receipt of such a request and in any event within 21 days of receipt of the application'. Standard consultations are 21 days, and so if a consultee requests further information on the 21st day of consultations, for example, the discharging authority should be able to notify the undertaker of this request later than 21 days after receipt of the application (noting also that it is not practicable for consultations to be sent out on the day of receipt of an application in all cases). Sub-paragraph (5) should be deleted. ESC does not consider it acceptable that where further information is requested in relation to part only of an application that it should be treated as separate from the remainder of the application. This is not practicable nor feasible. ESC therefore suggests that Paragraph 2 of Schedule 4 is amended as follows: 2.—(1) Where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application. (2) If the Requirement specifies that consultation with a Requirement consultee is required, the relevant authority must issue the consultation to the Requirement consultee within 5 days of receipt of the application. (3) If the relevant authority, or a Requirement consultee, considers further information is necessary, the relevant authority must, within 26 days of consultation being issued where applicable,	The Applicant recognises these concerns and has discussed these with ESC. However, the Applicant maintains that the timescales set out within the DCO are necessary and appropriate for the reasons previously set out within **Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085].**	Not agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
			notify the undertaker in writing specifying the further information required. (4) If the relevant authority does not give the notification mentioned in sub-paragraph (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.		
3.12.34	**Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Schedule 4	Provision should be made for the discharging authority to consult SCC/ESC as appropriate – where ESC is discharging body, there should be a requirement to consult SCC, when SCC is not named in a specific requirement. This should apply in the reverse when SCC is the discharging body. In the case of requirements in respect of which East Suffolk Council is the discharging authority under Schedule 3 of this Order, ESCI must consult SCC. In the case of requirements in respect of which SCC is the discharging authority under Schedule 3 of this Order, SCC must consult with ESC. Whilst ESC acknowledges that this provision is included for Requirement 6, it is not for other DCO Requirements.	Requirement 6 states that the management plans must be submitted to and approved by the relevant plan, scheme or strategy in consultation with the relevant district or county council. Therefore, the Applicant considers that the drafting within the DCO already deals with this concern.	Not agreed
3.12.35	**N/A**	Schedule 4 (3) - Fees	ESC considers that further discussion on the fee for discharge of requirements is necessary. One option is to have a charging schedule to set out clear fees for each discharge of requirement. Part (2) is not accepted by ESC. It is not appropriate for a refund to be provided under (a) or (b).	The Applicant notes that Schedule 4 does not provide for any refund to be given under (a) or (b). The Applicant's view is that there is not a substantial difference between ESC and the Applicant on this issue, but agreement could not be reached before Deadline 7.	Not agreed
3.12.36	**N/A**	Schedule 4 (para 4(2)(e))	ESC considers 14 days too short a period and suggests 28 days would be more appropriate.	The Applicant considers that the 14-day period for counter-submissions in an appeal process is appropriate and proportionate. 14 days aligns with the 14 days set out within Paragraph 4(2)(d). Given that if the appeals process has started there will have already likely been delays to the Proposed Project as a result of the requirements discharge process, it is imperative that appeals are settled efficiently, and this timescale is considered to be reasonable in this context.	Not agreed

3.3 Matters that have been agreed prior to Deadline 5

Table 3.13 Matters that have been agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.13.1	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**	Health and Wellbeing – Study Area	ESC raised no concerns with the study area during statutory consultation, so agreement is confirmed.	The Study Area was set out within the PEIR and has been used for the ES. This study area was also shown at the meeting in October 2023. The study area has been set out within the ES chapter (**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**).	Agreed
3.13.2	**Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 7 **Application Document 9.84 (E) Register of Environmental Actions and Commitments** submitted at Deadline 7	Ecology and Biodiversity - Trenchless techniques	ESC has agreed to the trenchless techniques as set out in the REAC and oCEMP. Noting that strict timings for the setup of the compound on land south of North Warren are required to address potential adverse impacts on statutory designated nature conservation sites.	The Applicant has confirmed trenchless techniques will be used for crossing the SSSI/RSPB reserve and will be a commitment in the DCO. This is secured in the Offshore Outline CEMP (**Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 7) and the Register of Environmental Actions and Commitments (**Application Document 9.84 (E) Register of Environmental Actions and Commitments** submitted at Deadline 7).	Agreed
3.13.3	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Ecology and Biodiversity - Skylark nesting	The survey findings are consistent with ESC's understanding of skylark presence in the local area. Proposed mitigation land for this species within the DOL is noted.	Bird surveys have recorded many nesting skylarks in fields across the survey area. Mitigation is included within the DCO Order Limits in the form of a field for delivery of skylark plots at twice the rate required by Countryside Stewardship. This is secured within Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7, within the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7)	Agreed
3.13.4	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**	Ecology and Biodiversity - Hedgerow survey	It was requested that when undertaking hedgerow surveys, National Grid should not simply report 'units' but quantify extents e.g. in square metres. It was noted that in addition to the standard botanical and historical criteria for defining 'Important Hedgerows' Suffolk has developed some additional criteria. These were subsequently confirmed to be '200 (or more) bat passes, or 5 (or more)	Approach to hedgerow survey confirmed and data shared with ESC. Each specific important hedgerow has been identified in DCO documentation (**Application Document 6.3.2.2.A ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]**) including using the additional criteria identified by ESC. Impacts are quantified in extent (i.e. metres). In order to enable gaps to be closed for bats, crossing methods suggested by ESC including hurdles to be placed	Agreed

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	submitted at Deadline 7 **Application Document 6.3.2.2.A ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]**		barbastelle passes, in a single survey'. This is used to identify hedgerows that would justify additional mitigation measures (e.g. further narrowing of the corridor width and use of temporary features like hazel hurdles or similar to fill gaps overnight). It should be noted there is also a criterion in the latest Bat Conservation Trust survey guidance. These criteria are used as part of the assessment presented in the ES.	at night have been included in the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7).	
3.13.5	**N/A**	Agriculture and Soils - Data from other projects	ESC requested that data from other projects is sought to reduce impacts on landowners associated with surveys and that data from the Proposed Project is also shared.	The predictive mapping has drawn on publicly available data and has used soil survey data from previous surveys available from the National Soil Resources Institute (NSRI). The Applicant will share survey data with other projects and landowners. The data obtained for the Proposed Project is either publicly available or has been purchased from NSRI. This data has been set out in the Agricultural Land Classification (ALC) report and will be publicly available once the DCO application has been submitted.	Agreed
3.13.6	**Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** and **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment - Suffolk**	Landscape and Seascape Character baseline	ESC raised no concerns on the baseline of the landscape assessment as set out in the PEIR and acknowledged that the ES will provide further information. ESC agreed the baseline landscape receptors as set out in the PEIR in an email sent on 7 June 2024.	The Landscape Character Areas (LCAs) and Seascape Character Areas (SCAs) were set out in the baseline section of the PEIR. The Statutory Consultation responses required further detail of the key characteristics of the LCAs and SCAs which is included within **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** and **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]**.	Agreed
3.13.7	**N/A**	Visual Amenity baseline – Representative Viewpoints	Within the 22 April 2024 meeting, it was set out that viewpoint locations have been updated following stakeholder requests and include two new viewpoints at Friston to ensure a robust approach as set out by National Grid. Representative viewpoints agreed via email on 23 January 2025.	The representative viewpoints were set out in the baseline section of the PEIR. Following the production of the PEIR, five additional representative viewpoints were added following Statutory Consultation comments, additional site work and design development.	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.13.8	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	Approach to PEIR assessment of effects	ESC acknowledged and agreed the approach to the PEIR assessment of effects within 27 February 2024 meeting.	The assessment of effects on landscape character (including the AONB) and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment. The detailed assessment of effects on landscape character and visual amenity is presented within **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** in line with the methodology and professional judgement.	Agreed
3.13.9	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	Study Area	Following discussions and correspondence ESC agreed the study area in email sent on 7 June 2024.	The Study Area is set out within **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**. The study area comprises an area of 3 km from the Order Limits surrounding the proposed Saxmundham Converter Station and Friston Substation and 1 km from the Order Limits around the proposed landfall and HVDC and HVAC cable corridors.	Agreed
3.13.10	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	Mitigation - Planting heights for mitigation planting within year 15 photomontages	Following discussions and correspondence which included sharing relevant information regarding planting heights ESC agreed, in correspondence dated 13 August 2024, to the planting heights provided by National Grid on 2 August 2024 as a basis for presenting the visualisations.	The planting heights for year 15 visualisations have been discussed with and agreed with ESC.	Agreed
3.13.11	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	LVIA methodology	ESC agreed to the approach to the LVIA methodology set out in the PEIR in an email sent on 7 June 2024.	The LVIA methodology was set out within the PEIR and is presented in the ES in **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**, with minor updates following the publication of the GLVIA3 Notes and Clarifications Technical Guidance Note by the Landscape Institute since the PEIR was prepared. The LVIA methodology was circulated again after the 27 February 2024 meeting. The 27 February 2024 thematic meeting discussed several points raised by ESC at Statutory Consultation regarding the LVIA methodology and concluded that more detail will be provided within the ES. The LVIA methodology presented in the ES is considered to be appropriate with guidance and typical approaches and referred to descriptive text in accompanying appendices.	Agreed
3.13.12	**Application Document 6.3.2.1.A ES Appendix 2.1.A**	Photomontage methodology	ESC agreed the methodology in email sent on 7 June 2024.	The photomontage methodology was updated following the PEIR and used for photomontages which have been prepared for the ES (**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage**	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]			**Methodology [APP-095]**). This methodology has been agreed by the Parties.	
3.13.13	**Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]** **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Design principles and landscape strategy	ESC has been involved in the development of design principles and the landscape strategy. This has been covered in thematic meetings, including the 27 February 2024, 22 April 2024 meetings and 8 January 2025 meetings. ESC has reviewed and is satisfied with the design principles and landscape strategy set out in the design documents, landscape and visual ES chapter and Outline LEMP.	Design principles and landscape strategy, including reference to 'good design', have been in development for both the Proposed Project and an illustrative masterplan for co-location in parallel as set out in **Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]** and **Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**. The Applicant submitted the design documents and landscape and visual ES chapter and Outline LEMP with the submission of the DCO Application.	Agreed
3.13.14	**N/A**	Approach to assessment of Sequential Cumulative Effects	ESC agreed to the approach for assessing sequential visual effects in relation to cumulative effects via email sent on 7 June 2024.	It was discussed in the 27 February 2024 meeting that the ES chapter will assess sequential visual effects in relation to cumulative effects, as requested by stakeholders at Statutory Consultation. This is proportionate based on the information available at the time of writing. A list of key routes in the area was put forward to ESC for comment and was agreed. It was also explained that landscape cumulative assessment covers indirect and direct effects on perceptual qualities, so it is considered that landscape sequential effects have been covered.	Agreed
3.13.15	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1**	Scope out Year 15 effects for cable routes and landfall	ESC agreed the approach to Year 15 effects for cable route and landfall in an email sent on 7 June 2024 (based on assumption that all landscape restoration works have been wholly successful).	It was queried in the 27 February 2024 meeting as to why ESC felt that year 15 effects on cable routes and the landfall are required as significant effects are not expected at year 1 and full reinstatement will occur after construction with reasoning given in the circulated meeting minutes. ESC requested that year 15 effects are still reported on, which the Applicant agreed to and is included in the ES	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	Landscape and Visual [REP4-023]			(**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**). The Applicant agreed to include this reinstatement commitment in the ES at the request of ESC. Land used temporarily will be reinstated where practicable to its pre-construction condition and use, unless agreed otherwise.	
3.13.16	**N/A**	Visual Amenity baseline – Representative vs Illustrative Viewpoints	Approach agreed in the 27 February 2024 meeting.	The 27 February 2024 meeting discussed whether illustrative viewpoints would be considered. It was set out that representative viewpoints are felt to be appropriate with reasoning given in the circulated meeting minutes.	Agreed
3.13.17	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Visualisation from diverted PRoW	ESC requested at Statutory Consultation for a visualisation from diverted PRoW. This was discussed at the meeting held on 25 June 2024 including challenges around taking summer photography due to access into cropped, working land and that the diverted PRoW information was not available during winter photography. Cross-sections or an artist impression for illustrative purposes were discussed. National Grid landscape explained that an illustrative cross-section of diverted PRoW would be provided within the ES. ESC has reviewed this and is satisfied.	The 27 February 2024 meeting discussed a request at Statutory Consultation for a visualisation from diverted PRoW and challenges around this with reasoning given in the circulated meeting minutes. The Applicant has prepared an illustrative cross-section of diverted PRoW, which is shown in Figure 2 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7.	Agreed
3.13.18	**N/A**	Photomontage presentation	ESC agreed to the photomontage presentation approach in email sent on 7 June 2024.	Following a request in the 27 February 2024 meeting, the presentation template for photomontages was issued by The Applicant following the meeting for comment.	Agreed
3.13.19	**N/A**	Separate assessment of the Heritage Coast	ESC agreed to the approach to having a separate assessment of the Heritage Coast in email sent on 7 June 2024.	The 27 February 2024 meeting discussed the approach that the Heritage Coast should be assessed separately to the AONB with reasoning given in the circulated meeting minutes.	Agreed
3.13.20	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Indicative Species Mix	ESC agreed in an email on 13 August 2024 for National Grid to proceed on the basis of the current mix with final agreement to be agreed at the detailed design stage. This was reiterated again in an email sent on 23 January 2025.	The Applicant sought to agree the indicative species mix. This includes the proposed mix % distribution and range of heights to be used in the year 15 visualisations (where relevant). This includes a variable distribution across the species to increase future resilience. The proposed indicative species mix was issued to ESC on 14 October 2024. The Applicant agree that the species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO (**Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7).	Agreed

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3.13.21	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	Landscape and Visual value judgements made in the ES	ESC agreed to these landscape and visual value judgements in an email on 23 January 2025.	In an email on 16 September 2024 The Applicant requested agreement of the landscape and visual value judgements that are made within the ES (**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**).	Agreed
3.13.22	**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**	Landscape and visual sensitivity ratings made in the ES	ESC agreed to these landscape and visual sensitivity ratings via email on 23 January 2025.	In an email on 16 September 2024 The Applicant requested agreement of the sensitivity ratings in the landscape and visual methodology which are presented in the ES (**Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]**).	Agreed
3.13.23	**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**	Presentation of the Visual Assessment Appendix of the ES	ESC agreed to the presentation of the visual assessment appendix of the ES in an email on 23 January 2025.	In response to SCC's request to present the visual appendix in the style that was used for the Bramford to Twinstead DCO, which presents the baseline and assessment along with photography, the Applicant presented this to ESC at the thematic meeting held on 19 November 2024. This is set out in the **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098].**	Agreed
3.13.24	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7	Hedgerow restoration	With regard to hedgerow restoration, it was advised that 'heavy standards' should not be included as they are not worthwhile. It is better to go for 'light standards' or feathered trees. The key whatever is used is good ground preparation e.g. a tined subsoiler to rip the ground.	The approach to hedgerow restoration was discussed at thematic meetings. Light standards and feathered trees will be used beyond the cable corridor. This is set out in the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7). The Applicant confirm that the comment from ESC came from the ESC landscape team but confirm that the ESC ecology team were present for this conversation.	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.13.25	**Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**	Photomontage locations	Locations for photomontages to support cultural heritage assessments agreed January 2024. It was agreed in subsequent emails and a meeting on 3 July 2024 that if winter photography cannot be submitted as part of the application submission ES, then an addendum should later be submitted.	Discussions via meetings and emails in late 2023 and early 2024 have agreed heritage photomontage locations.	Agreed
3.13.26	**N/A**	Assessment of effects at statutory consultation	Acknowledged and agreed the approach to the assessment of effects at statutory consultation within their response to the PEIR.	The assessment of effects on Cultural Heritage were presented within the PEIR. The PEIR is a preliminary assessment, and effects have been further assessed with more detail within the ES chapter in line with the methodology and professional judgement.	Agreed
3.13.27	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk** submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Archaeological Evaluation Trenching	ESC agrees that the archaeological trial trenching will be approved by SCC via a Written Scheme of Investigation to be produced by the archaeological subcontractor.	Works associated with undertaking the archaeological trenching to be fully agreed by a Written Scheme of Investigation (**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk** submitted at Deadline 7) as secured by Requirement 14 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7**.** This is to be produced by the archaeological subcontractor and sent to SCC for approval.	Agreed
3.13.28	**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk** submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Construction Monitoring	ESC wants the Applicant to commit to using continuous monitors or sensors, and these should be agreed with ESC prior to installation as part of the Air Quality Management Plan to be approved through discharge of Requirement 6. ESC confirms that the proposed air quality monitoring locations have been agreed with the Applicant. The Air Quality Management Plan to be approved through discharge of Requirement 6 must include agreement on monitoring locations and allow for review when required by either party. The monitoring location at Stratford St Andrew will not be required once the new bypass is operational. As such, the ability to review all locations and to agree a new monitoring location for this site will need to be available.	The Applicant confirms that continuous air quality monitors or sensors will be used, with the specific technology to be agreed with ESC prior to installation as detailed in the Outline Air Quality Management Plan (**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7**)**. **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk** submitted at Deadline 7 states that monitoring locations will be reviewed and moved if required. The Air Quality Management Plan includes the agreed monitoring locations and provides the mechanism for review and amendment where requested by either party.	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.13.29	**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk** submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Emissions from generators and HGVs	There must be consideration of generators and control of emissions from these. There is no recognition of the agreed commitment to the use of Euro VI HGV, use of the CTOMP providing for GPS monitoring of HGVs and the use of authorised construction routes. There will be a need for some form of checking and logging that all HGVs meet the Euro VI standard.	The Applicant confirms that the Air Quality Chapter of the ES (**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**) considers generator emissions. The outcome of the assessment has been discussed and agreed. Measure GG12 stipulates that HGVs should be Euro VI and measure AQ09 stipulates that all equipment complies with the appropriate NRMM standards, using stage 4 NRMM as a minimum and stage 5 where possible. Further to this, AQ04 requires the Applicant to avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable. These measures have been discussed and agreed. A Traffic Management and Monitoring System is proposed as set out in the Outline Construction Traffic and Management and Travel Plan (CTMTP) for Suffolk (**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7) to monitor HGVs and the use of authorised construction routes. As detailed in the Outline Air Quality Management Plan (**Application Document 7.5.6.1 (C) Outline Air Quality Management Plan – Suffolk** submitted at Deadline 7), all HGVs will be checked to ensure they meet the Euro VI Standard, and a log will be made as part of the monitoring requirements. All management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7).	Agreed
3.13.30	**Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]**	Noise survey data	Agreed approach in April 2023 and background noise levels agreed in February 2024. National Grid has discussed with ESC the noise and vibration assessment methodology in April 2023, with subsequent liaison occurring regarding the noise survey methodology and locations. The operational noise baseline assessment has been shared by National Grid with ESC, with the details, as presented in the ES, being agreed by ESC. ESC accepts the use of nighttime background sound levels as the appropriate criteria to work from in terms of setting an appropriate noise rating level.	Agreement on baseline noise survey methodology and resultant typical background noise levels for use in the operational noise assessment, which has been set out in the ES chapter (**Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]**).	Agreed
3.13.31	**Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise**	Construction traffic noise assessment methodology	ESC agreed the approach to the construction traffic noise assessment methodology in April 2023 and then in a follow up in February 2024, where the matter was discussed twice and all elements agreed.	Agreement on assessment methodology for construction traffic noise assessment based on guidance from the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration and Calculation of Road Traffic Noise (CRTN).	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
	& Vibration [AS-109]		Road Traffic Noise is a Highways Authority matter and will need to be considered by and agreed with Suffolk County Council Highways in this instance. Construction site traffic should be adequately considered in the site noise management plan under the agreed BS5228 methodology for noise and vibration.	Cumulative impacts from other projects are considered in the assessment. This has been set out in the ES Chapter **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109].** The Applicant confirm that noise from construction site traffic has been assessed in accordance with the agreed methodology, which is in accordance with BS 5228 guidance and the noise data and presented in the ES chapter as referenced above.	
3.13.32	**Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**	Cumulative Schemes – methodology	A meeting was held with ESC on 20 November 2024, where the cumulative assessment methodology was presented. The Consultee agreed to the methodology presented in the meeting. ESC reviewed the methodology set out in **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**, following submission of the DCO application. ESC is satisfied with the methodologies used in the intra-project and inter-project cumulative assessments.	The Applicant presented the cumulative assessment methodology on 20 November 2024, and this was agreed with ESC. The Applicant provided the cumulative effects assessment methodology in **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091].**	Agreed
3.13.33	**N/A**	Status of National Policy Statements for Energy	The status of the National Policy Statements (NPSs) was agreed by ESC as per the statutory consultation (statutory consultation response paragraph 3.1: *"The Energy NPSs were updated in November 2023 with the publication of revised NPSs EN-1 to EN-5"*)	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5). The relevant Energy NPSs form the primary decision-making framework for the DCO application.	Agreed
3.13.34	**N/A**	Status of Local Development Plan policy	The currently adopted development plan policy relevant to the Proposed Project's location in East Suffolk is the Suffolk Coastal Local Plan (adopted 23 September 2020) and the Saxmundham Neighbourhood Plan (made 26 July 2023).	Whilst the DCO application is required to be determined in accordance with the relevant NPSs, the SoS may consider Local Plans to be important and relevant to their decision making. The Local Plans for ESC and SCC are set out in their respective positions. In accordance with paragraph 4.1.15 of NPS EN-1, in the event of a conflict between NPS policy and local planning policy, the NPS will prevail for the purpose of Secretary of State (SoS's) decision making.	
3.13.35	**N/A**	Local Plan allocations	The following Local Plan allocations shown on the Suffolk Coastal Local Plan (adopted 23 September 2020) policy map are located in the draft Order Limits: SCLP9.3 Coastal Change Management Area (below ground DC cable and landfall) SCLP11.8 Parks and Gardens of Historic or Landscape Interest (northern access option to Converter Station site). [AONB/National Landscape Area (below ground DC cable and landfall)]	The Development Plan allocations identified in ESC and SCC's position columns are located within the draft Order Limits.	Agreed

Ref	Relevant Application Documents	Description of Matter	ESC's Current Position	The Applicant Current Position	Status
3.13.36	**Application Document 8.3 Strategic Options Report (October 2023) [APP-370]**	Strategic Options	ESC has reviewed the strategic options appraisal presented in the Strategic Option Report, Version A (**Application Document 8.3 Strategic Options Report (October 2023)** and agree with the approach and conclusions.	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, version A, October 2023, (**Application Document 8.3 Strategic Options Report (October 2023) [APP-370]** included as part of Statutory Consultation, is agreed.	Agreed
3.13.37	**Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**	Site selection	ESC has reviewed the Option Selection and Design Evolution report (**Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**) and agree with the methodology and conclusions of the site and route selection.	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023, included as part of Statutory Consultation (**Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]**) is agreed.	Agreed
3.13.38	**Application Document 5.1 Consultation Report [APP-301]**	Consultation Strategy	Agreed	The Consultation Strategy has been prepared taking account of input from ESC. The final version was issued to ESC on 20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	Agreed
3.13.39	**Application Document 5.1 Consultation Report [APP-301]**	Consultation Zones	Agreed	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory.	Agreed
3.13.40	**Application Document 5.1 Consultation Report [APP-301]**	Statement of Community Consultation	Agreed	ESC were consulted by The Applicant on the Statement of Community Consultation and The Applicant had regard to those comments.	Agreed

4. Approvals

Signed	
On Behalf of	ESC
Name	[redacted]
Position	Head of Energy Planning and Coastal Management
Date	29.04.2026

Signed	
On Behalf of	National Grid
Name	Sebastian Stevens
Position	Senior Project Manager (Consents)
Date	29.04.2026

5. References

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Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects

The Planning Inspectorate. (2015). *Advice Note two: The role of local authorities in the development consent process.* Retrieved from https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice_note_2_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20.

Appendix A Record of Engagement

Date	Topic/Engagement type/Attendees	Discussion points
21 and 26 August 2020	*National Grid, SCC and ESC, Essex County Council and Mid Suffolk and & Babergh District Council – Sea Link and Bramford to Twinstead Introductory Briefing.*	*Meeting to introduce the work National Grid needs to take forward to develop and consult on two electricity reinforcements – Bramford to Twinstead and the HDVC subsea link between East Anglia and Kent (the Proposed Project). The Proposed Project background was introduced, regional context and reinforcement, approach to developing proposals, Proposed Project – how studies identified potential landfall, cable routes and connection points-communications, questions/AOB.*
20 October 2021	*SCC, ESC and National Grid - Project Introduction Meeting*	*Project introduction and update, need case, project programme, consenting strategy, emerging option areas and preferences, routing and siting, consultation strategy.*
11 November 2021	*SCC, ESC and National Grid - Project Update Meeting*	*Project update, consultation strategy and locations, need case and coordination with other projects, routing and siting, community benefits.*
09 December 2021	*SCC, ESC, National Grid - Update Meeting.*	*Project update, consenting route and S.35 request, environmental surveys, coordination with other projects, routing and siting, convertor station overview.*
13 January 2022	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update, environmental surveys, coordination with other projects, routing and siting options appraisal and constraints, project programme.*
10 March 2022	*SCC, ESC and National Grid – Project Update Meeting*	*Project update, environmental surveys, consultation and*

Date	Topic/Engagement type/Attendees	Discussion points
		engagement, coordination with other projects, project programme.
08 April 2022	*SCC, ESC, National Grid and NGV meeting*	*Joint meeting with ESC, SCC, National Grid Ventures (NGV) and National Grid to discuss potential for coordination between the Proposed Project (National Grid) and Nautilus (NGV) projects. Discussion of each project converter station and landfall potential locations. Business separation between NGV and National Grid was also discussed and explained.* *Proposed Project update discussed following joint element of the meeting.*
28 April 2022	*SCC & ESC, National Grid and NGV meeting*	*Joint meeting with SCC and ESC, National Grid Ventures (NGV) and National Grid to discuss scope, process and sites in relation to onshore coordination between the Proposed Project (National Grid) and Nautilus projects. Business separation between NGV and National Grid was also discussed and explained.* *Proposed Project update discussed following joint element of the meeting.*
12 May 2022	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update, environmental surveys, coordination with other projects, project programme.*
09 June 2022	*SCC, ESC and National Grid – Project Update Meeting*	*Project update, environmental surveys, consultation strategy, sites to be included in non-statutory consultation, project programme.*
18 July 2022	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, environnemental survey, Project programme.*
11 August 2022	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update, environmental surveys, EIA Scoping, consultation strategy, EIA scoping, Council Member engagement*

Date	Topic/Engagement type/Attendees	Discussion points
08 September 2022	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update, environmental surveys, non-statutory consultation, consultation strategy, Council Member engagement dates, site visits, project programme.*
17 October 2022	*ESC Internal Drainage Board (IDB) and National Grid Meeting – Water Environment*	*Initial review meeting Agenda: identify all IDB watercourses affected by the proposed works options, confirm that the crossing locations are acceptable, identify any concerns or requirements regarding cable crossing methodology and confirm design criteria to determine discharge flow rate into an IDB watercourse.*
20 October 2022	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, non-stat consultation and consultation strategy, environmental surveys, electromagnetic fields, project programme.*
10 November 2022	*Site visit National Grid, SCC and ESC*	*Joint site visit with National Grid, SCC and ESC visiting emerging preference landfall location and convertor station option Site 1.*
08 December 2022	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, non-statutory consultation, scoping opinion, upcoming site visit, environmental surveys, project programme.*
13 December 2022	*Site visit with National Grid, SCC, ESC, Suffolk Wildlife Trust, RSPB, Natural England (NE), Environment Agency (EA)*	*Discussion of trenchless cable installation under RSPB reserve, exit pit, compound locations, convertor station design*
16 January 2023	*Email to SCC & ESC from National Grid*	*Email from National Grid to SCC and ESC providing update on options in Suffolk*
09 February 2023	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, non-statutory consultation feedback, scoping opinion, specialist thematic meetings to be arranged, Planning Performance Agreement (PPA) and engagement plan, coordination with other projects, project programme.*

Date	Topic/Engagement type/Attendees	Discussion points
09 March 2023	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, PPA, Host Authority Engagement Plan (HAEP), Communication Strategy, options consideration and communication.*
20 April 2023	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, Great Grid Upgrade, Co-location and coordination with other developers' projects, PPA*
11 May 2023	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, ground investigation, PPA, Statement of Common Ground (SoCG), Non-statutory consultation outcomes*
24 May 2023	*SCC, ESC, NE and National Grid Meeting – Landscape and Visual*	*Project update and timeline, viewpoints, study area and photomontages, approach to LVIA, landscape mitigation strategy and AOB / questions*
08 June 2023	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update, ground investigation, PPA, Landscape design, Statement of Community Consultation, Friston Substation design development*
13 July 2023	*SCC, ESC and National Grid – Project Update Meeting*	*Project update, Statement of Community Consultation, ground investigation, Engagement Plan/PPA, Site notices for statutory consultation, Converter Station design*
09 August 2023	*SCC, ESC and National Grid - Socioeconomics, Recreation and Tourism Meeting.*	*High-level project overview, scope, methodology, baseline sources, sensitive receptors.*
28 April 2023	*ESC, SCC and National Grid - Noise and Vibration Meeting*	*Engagement relating to the noise and vibration assessment methodology, and baseline noise surveys.*
14 September 2023	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update, NE meeting, Biodiversity Net Gain, RSPB meeting, surveys, Statement of Community Consultation, PPA*
16 October 2023	*SCC, ESC and National Grid – Health and Wellbeing Meeting*	*Engagement relating to the PEIR – covered a high-level project*

Date	Topic/Engagement type/Attendees	Discussion points
		overview, scope, methodology, baseline sources, sensitive receptors in relation to health and wellbeing.
08 December 2023	*SCC, HE and National Grid - Archaeology Meeting*	*Virtual Thematic Group Meeting with HE and Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on results of the geophysical survey and proposals around archaeological evaluation trenching.*
18 December 2023	*ESC Statutory Consultation Response Letter.*	*This letter was in response to the 2023 Statutory Consultation. ESC raised concerns over the need for the Proposed Project, impact on coastal processes, operational noise and vibration, construction noise and vibration and interproject cumulative effects, air quality, landscape, design and heritage, ecology, tourism and economy and community compensation. ESC also confirmed that they objected to the Proposed Project due to harm to communities, environment and economy of Suffolk.*
04 January 2024	*SCC Highways information issued*	*National Grid issued additional plans as requested by SCC, including visibility splays.*
08 January 2024	*SCC, ESC and National Grid – Water Environment Meeting*	*Project program, engagement to date, FRA approach*
18 January 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Project update, ground investigation, geophysical surveys, statutory consultation feedback overview, thematic meetings, PPA*
05 February 2024	*SCC, ESC and National Grid - Noise and Vibration Meeting*	*Engagement relating to the PEIR outcomes for noise and vibration and next steps.*
06 February 2024	*ESC, SCC and National Grid - Air Quality Meeting*	*Engagement relating to the air quality assessment methodology and statutory consultation feedback responses*

Date	Topic/Engagement type/Attendees	Discussion points
08 February 2024	*SCC, ESC and National Grid – Project Update Meeting.*	*Current activity and surveys update, thematic meetings update, PPA, SoCG, Converter Station design,*
09 February 2024	*SCC, ESC and National Grid – Socioeconomics, Recreation and Tourism Meeting*	*Project update and timeline, socio-economic statutory consultation feedback and responses (tourism economy, PRoW, study area, surveys) discussion, next steps.*
14 February 2024	*SCC and National Grid - Geology and Hydrogeology for Minerals Meeting*	*Project update and timeline, statutory consultation overview, minerals update,*
15 February 2024	*SCC, ESC and National Grid – Geology and Hydrogeology Meeting*	*Project update and timeline, statutory consultation, geology and hydrogeology updates, thematic meetings and AOB/questions.*
15 February 2024	*SCC, ESC Ecology and National Grid - Terrestrial Ecology Thematic Meeting*	*Ecology including horizontal direct drilling, skylark nesting, survey coverage, dormouse damaged tubes, biodiversity net gain, hedgerow restoration, temporary access roads, important hedgerow standards to include bats.*
19 February 2024	*SCC, ESC and National – Health and Wellbeing Thematic meeting*	*Project update and timeline, health and wellbeing update and timeline, statutory consultation feedback (assessment guidance, additional planning guidance, and employment and income assessment), discussion, next steps*
27 February 2024	*SCC, ESC, Natural England, National Landscape and National Grid – Landscape and Visual Meeting*	*Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, effects on the National Landscape / Heritage Coast, design principles and landscape strategy, outline landscape and ecology management plan and questions*

Date	Topic/Engagement type/Attendees	Discussion points
28 February 2024	*SCC, ESC and National Grid - Transport Meeting*	*Transport meeting to provide a project update and to review statutory consultation (PEIR) feedback*
04 March 2024	*SCC, ESC, EA and National Grid – Water Environment Meeting*	*Previous meeting action progress, Sequential Test update, baseline flood risk data, River Fromus crossing, drainage design updates*
14 March 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Current activity and surveys update, thematic meetings update, PPA, community benefits, ESO East Anglia Network Study findings*
21 March 2024	*SCC, ESC and National Grid – Agriculture and Soils Meeting*	*Presentation of approach to Agricultural Land Classification (ALC) surveys and assessment. Discussion included details on gap filling using predictive ALC approach, mitigation and soil management plans.*
11 April 2024	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*
24 April 2024	*SCC, ESC, Natural England, National Landscape and National Grid – Landscape and Visual Meeting*	*Project update and timeline, confirm agreement on aspects of the LVIA, long-distance cycling/walking routes that National Grid should consider in the assessment, mitigation design concepts, co-location illustrative masterplanning update.*
April 2024	*National Grid, ESC and SCC – Ecology Information Shared*	*The First season (2022-23) Breeding and Wintering bird reports for Suffolk were shared with ESC and SCC by National Grid for information.*
09 May 2024	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*
28 May 2024	*National Grid, ESC and SCC – Landscape and Visual Information Shared (via email)*	*The Landscape and Visual Study area, Landscape Character receptors – District, Seascape Character receptors, representative*

Date	Topic/Engagement type/Attendees	Discussion points
		viewpoint locations, LVIA approach and methodology, photomontage methodology, sequential cumulative visual assessment, scope out year 15 for Landfall and Cable Route and the Heritage Coast Assessment were all shared with SCC and ESC by National Grid for agreement.
28 May 2024	*SCC, ESC and National Grid Meeting – Landscape and Visual*	*Project update and timeline, LVIA and agreements, long distance cycling/walking routes, Design Mitigation, Co-location Illustrative Masterplanning update*
May 2024	*National Grid, ESC and SCC – Ecology Information Shared*	*A preliminary noise assessment – contour maps only – for Suffolk (not part of the DCO documentation) was shared with both ESC and SCC by National Grid for information.*
06 June 2024	*National Grid, ESC and SCC – Landscape and Visual Information Shared (via email)*	*The Provisional Growth Rates, Suffolk Indicative Species Mix and oLEMP Draft Structure were all shared with ESC and SCC by National Grid for agreement.*
07 June 2024	*SCC, ESC, NE, National Grid - Terrestrial Ecology Thematic Meeting*	*Summary of terrestrial ecology survey and assessment work since last meeting / confirmation of use of trenchless techniques, depth of drill and risk of frac out / noise modelling results regarding disturbance of adjacent SSSI and SPA from HDD and associated works / temporary loss of woodlark and nightjar foraging habitat outside SPA / proposals for offsetting loss of skylark nesting habitat / proposals for creation/enhancement of acid grassland / Biodiversity Net Gain opportunities*
13 June 2024	*SCC, ESC and National Grid – Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*

Date	Topic/Engagement type/Attendees	Discussion points
19 June 2024	*SCC and ESC Joint Letter to National Grid regarding Masterplanning*	*This is a joint letter received from SCC and ESC and raises concerns related to masterplanning and access at the proposed converter station location near Saxmundham as well as questions on coordination opportunities with other projects.*
19 June 2024	*SCC, ESC and National Grid - Socioeconomics, Recreation and Tourism Meeting*	*Project update and timeline, socio-economic statutory consultation feedback and responses (tourism economy, PRoW, study area, surveys) discussion, next steps.*
25 June 2024	*SCC, ESC, Natural England, National Landscape and National Grid - Landscape and Visual Meeting*	*Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, effects on the National Landscape / Heritage Coast, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB*
July 2024	*National Grid, ESC and SCC – Documents Shared (via email)*	*The draft DCO, short Project Description, example works plans, explanatory memorandum and HRA report were shared with ESC and SCC for comment by National Grid.*
02 July 2024	*ESC, SCC and National Grid - Air Quality Meeting*	*Engagement relating to project updates, the Air Quality Management Plan, proposed construction phase air quality monitoring locations and statutory consultation feedback responses.*
11 July 2024	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*
12 July 2024	*National Grid, ESC and SCC - Landscape and Visual Information shared (via email)*	*The Landscape and Visual Draft Photosheet was shared with ESC and SCC by National Grid for agreement.*

Date	Topic/Engagement type/Attendees	Discussion points
15 July 2024	*National Grid, ESC and SCC - Landscape and Visual Information shared (via email)*	*The Suffolk VP locations were shared with ESC and SCC by National Grid for agreement.*
16 July 2024	*SCC, ESC and National Grid – Transport/Public Rights of Way Meeting*	*Targeted Consultation – Introduction, Design Changes, Additional PEI, Core Working Hours; Public Rights of Way – PEIR Finding, Emerging Design, Statutory Consultation Feedback, Outline PRoW Management Plan, AOB/questions*
31 July 2024	*National Grid, ESC and SCC - Landscape and Visual Information shared (via email)*	*The photosheet template VP01 was shared with ESC and SCC by National Grid for agreement.*
02 August 2024	*National Grid, ESC and SCC – Landscape and Visual Information shared (via email)*	*The representative viewpoint locations and growth rate for the Proposed Project were shared with ESC and SCC by National Grid for agreement.*
02 August 2024	*National Grid, ESC and SCC – Landscape and Visual Information (via email)*	*The planting heights for mitigation planting within year 15 photomontages was shared by National Grid with ESC and SCC for review and comment.*
05 August 2024	*SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting*	*Summary of terrestrial ecology survey and assessment work since last meeting / confirmation of use of trenchless techniques, depth of drill and risk of frac out / noise modelling results regarding disturbance of adjacent SSSI and SPA from HDD and associated works / temporary loss of woodlark and nightjar foraging habitat outside SPA / proposals for offsetting loss of skylark nesting habitat / proposals for creation/enhancement of acid grassland / AOB. In particular, the differences between Design Freeze 2 and Design Freeze 3 were discussed. A request was made to NE that management prescriptions be provided for Sandwich Bay to Hacklinge Marshes SSSI required*

Date	Topic/Engagement type/Attendees	Discussion points
		for the site to meet favourable condition
08 August 2024	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*
22 August 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The oLEMP draft structure was shared with both ESC and SCC by National Grid for agreement.*
27 August 2024	*SCC, ESC and National Grid – Landscape and Visual meeting*	*Project update and timeline, draft photosheet format, viewpoint plans, and growth rates issued on 2 August 2024, LVIA updates, Friston scenarios, update on AONB, update on Design Council and Design Principles,*
06 September 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Suffolk Landscape and Visual Value document and the sensitivity ratings were shared with ESC and SCC by National Grid for agreement.*
10 September 2024	*SCC, ESC and National Grid – Representative Viewpoints Meeting*	*Discussion regarding landscape viewpoints, River Fromus Bridge Crossing.*
10 September 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Representative Viewpoints were shared with ESC and SCC by National Grid for agreement.*
10 September 2024	*Suffolk & Essex Coast & Heaths National Landscape Partnership and National Grid Meeting*	*Engagement with National Landscape Partnership in regard to how the s85 enhanced duty requirement would be met*
12 September 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Project update and timeline, thematic meetings, PPA, masterplanning*
17 September 2024	*ESC NSIP Working Group and National Grid Meeting*	*Senior project team presented to a cross-party group of councillors and planning officers. Discussions around design, compensation, mental health and coordination.*

Date	Topic/Engagement type/Attendees	Discussion points
17 September 2024	*SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting*	*Discussion of whether the bridge across the River Fromus can be moved to preserve the veteran oak and large horse chestnut that would be lost under DF3 alignment. Consideration of whether harvesting of willow plantation along the Fromus will affect BNG (subsequently confirmed plantation will be felled by landowner prior to scheme being commenced). Consideration of how to mitigate the effect of breaching hedgerows on bats e.g. use of hurdles to close gaps overnight. Discussion of duration of skylark plot mitigation.*
10 October 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Suffolk Indicative Species Mix was shared with ESC and SCC by National Grid for agreement.*
10 October 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Project update and timeline, thematic meetings, PPA, masterplanning*
14 October 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Draft Mitigation Design package was shared with ESC and SCC by National Grid for comment.*
16 October 2024	*National Grid, ESC and SCC – Air Quality information shared (via email)*	*The methodology for the air quality assessment was shared with both ESC and SCC by National Grid for confirmation and for ESC and SCC to agree the construction monitoring locations.*
05 November 2024	*Suffolk Design Review Panel*	*Formal review meeting with Suffolk Design Review Panel (run by Frame Projects). ESC provided briefing to Panel. SCC also in attendance.* *Purpose of the views of the Panel on the quality of the architecture and treatment of the buildings, the proposed masterplan, including opportunities to share infrastructure with other National Grid Ventures projects, and the approach to integrating the buildings and access*

Date	Topic/Engagement type/Attendees	Discussion points
		into the landscape. Comments also welcomed on National Grid's proposed design principles and scope for post-consent design controls.
11 November 2024	*SCC and ESC Letter – DRP Follow up*	*Joint letter from SCC and ESC with comments regarding master-planning of the proposed converter station site near Saxmundham and follow up after Design Review Panel.*
14 November 2024	*SCC, ESC and National Grid - Project Update Meeting*	*Project update and timeline, thematic meetings, PPA, masterplanning. The updated Order limits were presented to ESC and SCC. The design changes and rationale behind them were discussed, including compounds at Saxmundham and access to the Saxmundham site.*
19 November 2024	*SCC, ESC and National Grid - Landscape and Visual Meeting*	*Project update and timeline, discussion on material circulated to stakeholders, additional discussion points, mitigation design, targeted consultation comments, AOB and questions.*
20 November 2024	*SCC, ESC and National Grid - Cumulative Effects Meeting*	*Discussion to review short-list of schemes in Suffolk and the approach for the cumulative assessment work, including for Traffic and Transport. National Grid requested any comments from the Consultees on the short-list and long-list to be provided within 3 days post meeting.*
20 November 2024	*National Grid, ESC and SCC – Cumulative Impacts Information Shared (via meeting).*	*The cumulative impacts assessment methodology and the cumulative schemes short list and long list were shared with both ESC and SCC by National Grid, with comments on the long and short list requested to be provided within 3 days post meeting.*

Date	Topic/Engagement type/Attendees	Discussion points
25 November 2024	*SCC and ESC Letter – Follow-up from DRP feedback*	*Joint letter from SCC and ESC with comments on the feedback from the Design Review Panel (DRP) and masterplanning.*
27 November 2024	*National Grid, ESC and SCC – Socioeconomics, Recreation and Tourism Information shared (via email)*	*The PRoW Technical Note was shared with both ESC and SCC by National Grid for feedback and comment on the approach within the Technical Note.*
27 November 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Landscape and Visual Impact methodology was shared with ESC and SCC by National Grid for agreement.*
November 2024	*National Grid, ESC and SCC – Ecology Information*	*A summary of the impact assessment and proposed mitigation for Suffolk (not part of the DCO documentation but used as the basis for the Suffolk ES chapter) was presented to ESC and SCC by National Grid for information.*
December 2024	*National Grid, ESC and SCC documents and information shared (via email)*	*The revised requirements for the draft DCO and a table setting out how National Grid had addressed comments on the draft DCO received from ESC and SCC by the end of October 2024 were shared with ESC and SCC for review and comment by National Grid.*
09 December 2024	*SCC, ESC and National Grid - Meeting to follow-up on DRP (held on 05 November).*	*Discussion on masterplanning, design review panel meeting and design principles document.*
11 December 2024	*SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting (Suffolk proposals)*	*Approach to Biodiversity Net Gain. Key changes since the last meeting, particularly as a result of DF4. Alternative construction compound locations north of the Converter Station site and presence of Important Hedgerows. SCC indicated a concern over the effect of compound S04/S05 on the nearby Important Hedgerow.*

Date	Topic/Engagement type/Attendees	Discussion points
11 December 2024	*National Grid, ESC and SCC Ecology information shared (via email)*	*The Habitats Regulations Assessment (HRA) was shared with both ESC and SCC by National Grid following a request made by ESC and SCC.*
12 December 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Project update and timeline, thematic meetings, masterplanning, follow-up on BNG Strategy (presented at Terrestrial Ecology Thematic Meeting held on 11 December 2024)*
06 January 2025	*Road Safety Audits (email)*	*SCC response on draft audits received.*
08 January 2025	*SCC, ESC and National Grid - Landscape and Visual Meeting*	*Project update and timeline, discussion relating to table of agreement, discussion relating to landscape mitigation plans, update on Public Rights of Way,*
09 January 2025	*SCC, ESC and National Grid – Project Update Meeting*	*Project update and timeline, thematic meetings, draft DCO updates following LPA review comments, overview of DCO Design Documents, Masterplan / Design Principles / Design Approach Document*
16 January 2025	*ESC, SCC and National Grid - Air Quality Meeting*	*Engagement relating to project updates, the assessment findings, and to agree the air quality monitoring locations proposed for the construction phase.*
17 January 2025	*SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting*	*Updates since last meeting. Compound choices vs Important Hedgerow: Advance planting – around River Fromus (other than bridge construction footprint) and south of Converter Station; LEMP structure HRA update; habitat management.*
29 January 2025	*SCC, ESC and National Grid – Construction Working Hours Thematic Meeting*	*Engagement relating to construction working hours and discussion on noise and vibration.*

Date	Topic/Engagement type/Attendees	Discussion points
05 February 2025	*ESC and National Grid - Air Quality meeting*	*Further discussion of air quality monitoring locations proposed for the construction phase.*
10 February 2025	*ESC, SCC and National Grid – Masterplan update*	*Discussion on masterplanning and design principles document.*
13 February 2025	*SCC, ESC and National Grid - Project Update Meeting*	*Project update and timeline, thematic meetings, update on River Fromus Crossing.*
March - onwards	*SCC, ESC and National Grid*	*Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.*
25 June 2025	*ESC and National Grid*	*River Fromus bridge design thematic meeting. The meeting discussed the potential treatments for the bridge crossing to inform further ongoing discussion around design and the updates proposed for the River Fromus crossing visualisations.*
10 July 2025	*SCC, ESC and National Grid*	*Ecology thematic meeting discussed the Ecology related matters raised in the Suffolk County Council and East Suffolk Council Relevant Representations and other outstanding points to agree from an Ecology perspective from the current draft SoCG.*
21 July 2025	*SCC, ESC and National Grid*	*Landscape and Visual thematic meeting related points raised in both the SCC and ESC relevant representations and any other outstanding points to agree from a landscape and visual perspective from the current draft SoCG.*
6 August 2025	*SCC, ESC and National Grid*	*In person meeting to discuss the outstanding matters relating to traffic and transport.*
9 October 2025	*SCC, ESC and National Grid*	*River Fromus bridge design thematic meeting*

Date	Topic/Engagement type/Attendees	Discussion points
10 October 2025	*SCC, ESC and National Grid*	*Socio-Economics, Recreation and Tourism and Health and Wellbeing thematic meeting*
16 October 2025	*SCC, ESC and National Grid*	*Flood Risk and Drainage thematic meeting*
21 October 2025	*SCC, ESC and National Grid*	*Ecology thematic meeting to run through the Relevant Representation comments from ESC and SCC.*
23 October 2025	*SCC, ESC and National Grid*	*Noise thematic meeting*
22 January 2026	*SCC, ESC and National Grid*	*In person meeting to discuss the outstanding matters relating to traffic and transport.*
15 January 2026	*SCC, ESC and National Grid*	*Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.*
12 February 2026	*SCC, ESC and National Grid*	*Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.*
12 March 2026	*SCC, ESC and National Grid*	*Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.*
18 March 2026	*SCC, ESC and National Grid*	*Draft DCO meeting to discuss the wording of the draft DCO.*
09 April 2026	*SCC, ESC and National Grid*	*Re-occurring monthly progress call to discuss key deadlines as well as any queries that ESC and SCC have.*
16 April 2026	*SCC, ESC and National Grid*	*Agriculture and soils thematic meeting to run through the updates that were made to the Agricultural Classification Reports at Deadline 5.*
16 April 2026	*SCC, ESC and National Grid*	*Coastal environment thematic meeting to run through the principal*

Date	Topic/Engagement type/Attendees	Discussion points
		concerns relating to the coastal environment.

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