

# SEA LINK

EN020026

Summary statement of previously raised matters that have not been resolved to the Council's satisfaction

Suffolk County Council



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## Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>dDCO</i>	<i>Draft Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>ExA</i>	<i>The Examining Authority</i>
<i>JPEU</i>	<i>Joint Emergency Planning Unit</i>
<i>LLFA</i>	<i>Lead Local Flood Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>PRoW</i>	<i>Public Rights of Way</i>
<i>OWSI</i>	<i>Outline Written Scheme of Investigation</i>
<i>REAC</i>	<i>Register of Environmental Actions and Commitments</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>

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

## Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a closing statements of final position including outstanding matters not resolved by end of examination. Examination library references are used throughout to assist readers.

## 1 Summary of the Council's Position

- 1.1 As set out in SCC's Local Impact Report [REP1-130], SCC considered that the Sea Link proposal as submitted by the Applicant contained significant shortcomings that needed to be addressed if the project was to be made suitable to be granted Development Consent by the Secretary of State. The most important (but by no means the only) matters identified in the LIR were the proposed use of the Benhall Rail Bridge on the B1121 as the access route for the Saxmundham Converter Station, especially for AIL movements, the impacts of the proposed new crossing of the River Fromus on landscape and cultural heritage, the proposed extent of the construction working hours, and the lack of adequate co-ordination with (and cumulative assessment with) other major projects in the general area, including other consented and proposed NSIPs (with particular reference to the Friston substation, already consented by the East Anglia One North/East Anglia Two DCOs, and to the co-located proposals for Lion Link). In its representations and participation throughout the Examination, SCC sought to resolve outstanding matters with the Applicant. However, based on SCC's understanding of the Applicant's expected position at Deadline 7, there are cases where SCC has been unable to reach agreement with the Applicant and, whilst some issues in dispute have narrowed, the most significant matters remain outstanding, and there has also been a failure to resolve other more detailed aspects. Non-exhaustive summaries of SCC's positions on these issues are set out with references to detailed submissions where relevant. SCC welcomes the suggestions by the Examining Authority in its Schedule of Recommended Amendments to the Applicant's draft DCO [PD-024], and has provided its detailed comments on those suggestions in a separate SCC submission at Deadline 7.
- 1.2 Nonetheless, as matters stand at the close of the Examination, SCC considers that the Sea Link proposal should not be granted Development Consent unless further changes are made to the project and its attendant mitigation, some of which go beyond the scope of what could be achieved simply by making further revisions to the draft DCO and its subordinate control documents, and would require the Secretary of State to insist that the Applicant take additional steps to mitigate or compensate for the impacts of the proposal. That position notwithstanding, on a without prejudice basis SCC has set out, as part of its detailed comments on [PD-024] also submitted at Deadline 7, the changes that it is seeking to the draft DCO, in the event that the Secretary of State were minded to make a Development Consent Order. SCC has also set out the changes it is seeking to the control documents in its Comments on Submissions received by Deadline 6, also submitted by SCC at Deadline 7. SCC has provided further DCO

drafting to secure previously requested mitigation, including updated wording of certain requirements proposed by SCC at Deadline 6 [REP6-237] at Deadline 7.

- 1.3 This document focuses on those matters which are of the highest importance to SCC. The full account of outstanding matters can be found in the final Statement of Common Ground.

## **2 Access Routes for Construction**

- 2.1 Significant concerns have been raised to the Applicant regarding the justification of the choice of the western access route to the converter station site near Saxmundham via the B1121 and the inclusion of a permanent crossing over the River Fromus. The Council believes other access routes which could have potentially avoided impacts caused by this access route have not been reviewed adequately. SCC has given a more detailed account of a potential alternative access route using the B1122/consented Sizewell Link Road before joining a new haul road across Leiston Airfield linking to the B1119, as requested by the ExA in response to Action Point 2 from CAH1 [REP4-149]. There, SCC compares the positive and negative considerations of the two routes and concludes that, on balance, SCC's proposed alternative route avoids significant impacts and uncertainty, providing a resilient route for both this project and future projects connecting to the growing energy hub in East Suffolk.
- 2.2 A justification document for the selected route was produced by the Applicant at the Council's request; however, the Council believes the document did not adequately explain the justification for discounting other potential options, including the use of the consented Sizewell Link Road, when considering the benefits SCC responded to this document in [REP6-141], which should be read in conjunction with [REP3A-031], [REP4-149], [REP5-178] and [REP5-179] for SCC's full position.
- 2.3 However, if the project is to be consented on the basis of what is feasible within the Order Limits (as now proposed), it will be necessary for access to the Saxmundham Converter Station to be achieved via the B1121 and with use of the weight-restricted Benhall Rail Bridge. Of the two options for addressing the constraints imposed by those weight restrictions, SCC acknowledges that the Applicant has expressed a preference for Option 1 which would entail the repair and strengthening of the existing bridge (subject to that being shown to be feasible, which is dependent on survey work that is yet to be carried out). SCC concurs that Option 1 is preferable to Option 2 (the repeated installation/removal of a temporary overbridge, together with the attendant disruption to SCC's local highway network, including the nearby A12). SCC provided detailed text at Deadline 6 in its response to Action Point 13 [REP6-184] to show how the Construction Traffic Management Plan should be revised to prioritise the

provision of Option 1 (if demonstrated to be feasible) rather than Option 2. SCC remains of the view that such a prioritisation needs to be made into a firm commitment in the CTMP.

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### **3 Mitigation Hierarchy**

- 3.1 SCC's position remains largely unchanged from that set out in response to Action Point 45 from ISH 3 [REP6-184] which sets out SCC's justification for further mitigation/offsetting in relation to Public Rights of Way, Landscape and Visual, Public Health and Socioeconomics and Tourism. Whilst the revised Core Working Hours proposed by the ExA in its schedule of changes to the DCO is an important and necessary mitigation measure, SCC's position remains that further measures are necessary to meet the requirements of the mitigation hierarchy. As set out in SCC's previous representations, concerns around cumulative impacts play a large role in SCC's proposed additional mitigation.

#### **Public Rights of Way**

- 3.2 At Deadline 7, SCC has submitted further wording for the DCO and supporting evidence to justify financial contributions to provide offsetting and provision for mitigation funds where SCC has previously proposed such an approach. This mechanism is considered necessary for offsetting residual Public Rights of Way impacts due to the Applicant's position that SCC's requested measures cannot be achieved within the Order Limits with the type of land rights being sought. Therefore, SCC, unlike the Applicant, has the relevant powers to implement the measures being sought. SCC has provided evidence of how it has costed the proposed creation of a PRoW along the B1119 and improvement to footpath E-103/006 from Sluice Cottage to support the requested level of contribution.
- 3.3 Whilst SCC previously suggested that this contribution could be secured via a side agreement with the Applicant, SCC has provided wording which could be included as an article in the DCO to secure the funds should the Secretary of State concur with the Council's position. Appendix A of this document provides the costed proposal along with maps showing where these measures could be located. SCC would be content to negotiate such an appropriate legal agreement with the Applicant instead; however, SCC understands the Applicant's position to be that it is not willing to enter into such an agreement.
- 3.4 The costs include all the vegetation clearance, levelling, seeding, signing, bridges (to cross water courses), order making (and associated costs), compound fees and other fees associated with creating new routes or upgrading existing. The costs are calculated as per any section 106 request for a planning application. The new route would run from the highway verge and footway on the

- B1119 near to Manor Gardens (connecting to the existing footway along the B1119 to the northwest of the converter station site) to Bridleway E-491/010 at its northern end with its junction with the B1119. The route would be a preferable width of 4m but could be 2m (where this cannot be achieved) for an approximate distance of 1700m - 2050m depending on the route being north or south of the B1119.
- 3.5 Sluice Cottage to the Railway track footpath E-103/006 enhancement works are proposed due to impact of undergrounding. This would include vegetation clearance, levelling and surfacing (6mm granite to fines or other current local highway authority public footpath specification to a width of on average 1.5m x 780m). The cost also includes other associated works, such as site compound. Both of these enhancement measures have been advocated for by SCC since it submitted its LIR (see Chapter 11 of [REP1-130])
- 3.6 SCC recognises the addition of commitment GG43 to the REAC at Deadline 6 [REP6-134] and has relayed feedback on its wording to the Applicant in advance of Deadline 7 as reflected in Table 3.16 of the final Statement of Common Ground. Whilst the provision for a permissive route along the access from the B1121 is welcome, it is not considered sufficient to offset residual impacts as set out in response to Action Point 45 from ISH 3 [REP6-184]. For one thing, the likelihood of Lion Link using the haul road as its access route during construction means there will be delay in the route being made available for non-motorised users.
- 3.7 Moreover, these measures are necessary for offsetting for impacts for the permanent closure of Footpath, E-491/005 and the long-term temporary closure of E-491/006 and E-460/023. These long-term disruptions on the only PROW on the east of Saxmundham will change user behaviour and be detrimental to recreation, health and wellbeing. The diversions and permanent diversion will place users nearer to construction and later built form, where there were once open space, clear views and peace and quiet. These impacts will be increased with other closures due to the Lion Link application, and sequential closures which will result in further disruption and lengthy changes to some routes, in an area where not many routes exist going eastwards towards Leiston and the coast.
- 3.8 The relocation of the footpath due to the location of the converter station will cause a change in user experience, with the landscaping achieving minimal screening close to the building. The proposed route south of the B1119 would also give non-motorised users an alternative route to use to get to footpaths and bridleways to the East and take non-motorised trips off of the carriageway, making the trips safer with the uplift in transport trips during the construction process, usage by staff and maintenance, and in place when further development comes forward, such as Lion Link. The proposed new routes would

also provide links into existing bridleways for example E-491/010. The permissive route will not be a permanent route for the public to use in perpetuity and is not a permanent enhancement to the PROW. Whereas the route adjacent to the B1119 would be and would provide an off-road link to the PROWs and lanes to the East of the converter site, which have onward links to the coast and promoting walking routes.

- 3.9 As referenced in paragraph 3.4, attached as Appendix A is a table setting out the costing for the offsetting proposals proposed by SCC for a PROW along the B1119 and improvements to footpath E-103/006 from Sluice Cottage. SCC proposes that a contribution from the Applicant to fund SCC in carrying out these measures could be secured as an article in the DCO as follows:

**Financial arrangements for public rights of way in Suffolk**

*X.—(1) The undertaker will make the public rights of way financial contribution to Suffolk County Council for the purposes of the public rights of way works.*

*(2) The public rights of way financial contribution referred to in paragraph (1) must be made prior to the commencement of any part of the authorised development which will affect public rights of way in Suffolk.*

*(3) The public rights of way financial contribution referred to in paragraph (1) is to be used for the purposes mentioned in paragraph (4).*

*(4) The purposes are –*

*(a) the provision of a new route to run from the highway verge and footway on the B1119 near to Manor Gardens (connecting to the existing footway along the B1119 to the north west of the converter station site) to Bridleway E-491/010 at its northern end with its junction with the B1119; and*

*(b) enhancement works to the Sluice Cottage to the Railway track footpath E-103/006.*

*(5) In this article “public rights of way financial contribution” means a sum of no less than £112,715.80.*

**Tourism**

- 3.10 SCC has also provided mechanisms to secure mitigation, including a fund, in relation to Tourism in item 16 of [REP6-237]. SCC has worked with ESC since Deadline 6 and proposes an update to that wording to secure that ESC will be the party to undertake the monitoring. This is because ESC is already undertaking the monitoring of Sizewell C’s tourism impacts as part of the signed Deed of Obligation between the parties. This means that ESC is in the best position to determine what monitoring activities would complement those which are already being undertaken to avoid duplication of work. This would also ensure that the

results of monitoring as part of this requirement accounts for the findings of Sizewell C's monitoring and vice-versa to give a more holistic account of how tourism is being impacted in East Suffolk by the multiple ongoing NSIPs.

- 3.11 In addition, ESC doing the monitoring would allow the monitoring done under this DCO to bolster the existing monitoring activities. For instance, the scheme of footfall and spend monitors could be expanded to better capture the effects on tourism from the NSIPs in the region and to account for Sea Link's impacts. The perception studies being carried could be strengthened by expanding the areas for which these studies take place to account for changes in perception caused by Sea Link. This may allow for a more granular level of detail to be obtained which could distinguish between how Sea Link is impacting tourism perception in certain areas as opposed to other projects. This would also inform approaches to mitigation going forward both for Sea Link and other projects to ensure such measures are as effective as possible, in addition to being reasonable and proportionate.
- 3.12 SCC notes that the Applicant provided a detailed response on this matter in response to 3SERT2 of ExQ3 [REP6-111]. SCC considers that representations made by various IPs, including SCC and ESC, undermines the Applicant's claim that its assessment is robust, particularly when considering the context of cumulative developments. Moreover, there remains substantial uncertainty as to how tourism will be impacted cumulatively given that Sizewell C remains far from its peak construction period in terms of workforce and there are more projects in the pipeline which have not yet commenced, including Sea Link and Lion Link.
- 3.13 The Applicant also rejects the proposed monitoring of tourism on account of the inability to directly attribute impacts of this project to Sea Link specifically as opposed to other projects. SCC does not accept this line of reasoning, as the rationale for the Tourism Monitoring Plan is based on the cumulative impacts of existing and upcoming NSIPs in East Suffolk which contains sensitive tourism hotspots. Whilst it would be difficult to directly quantify Sea Link's impact on wider indicators of the health of the tourism industry, such as perception, spend and footfall, this does not mean that the impact is not one which must be mitigated in policy terms. Cumulative impacts may require mitigation in policy terms even if the contribution of the individual project is not significant, should the cumulative impact be of a certain magnitude. Sea Link will have a non-trivial negative impact on tourism in East Suffolk which will exacerbate impacts caused by cumulative projects.
- 3.14 Accordingly, it is not correct to claim that difficulties in attributing impacts to Sea Link mean mitigation is not required. These difficulties do not imply that there is no impact for which mitigation is necessary in policy terms. Modest contributions to existing measures being undertaken to improve tourism by Sizewell C, to

account for the fact that Sea Link is contributing to these impacts, may be an appropriate mitigation measure and this can be done in a proportionate way, recognising that Sizewell C's impact on tourism is greater than Sea Link's. Therefore, it is justified that proportionate and reasonable mitigation/offsetting measures, informed by monitoring, should be included in the application.

- 3.15 In addition, there will likely be location-specific tourism impacts for which Sea Link has greater influence compared to other projects. This could be caused by the project's road closures, local events, seasonal variations in traffic, local businesses in proximity to Sea Link's construction activities and businesses relying on the A12 to function. There will inevitably be a cumulative element to these effects as well when considering the Lion Link proposals. This further shows the need for monitoring and why the existence of monitoring by other projects does not justify the exclusion of any monitoring in this application.
- 3.16 The requirement proposed by SCC would also require detail on how any monitoring or mitigation measures which may be relevant to existing or ongoing tourism strategies or activities in East Suffolk. SCC would expect to see a plan as to how activities relating to the visitor economy can be measured and, where appropriate, mitigated against.
- 3.17 SCC wants to see effective consultation and ongoing co-operation between the Applicant and local partners. Following best practice, this would involve the establishment of a local working group or at the very least regular communication between partners. This is secured in SCC's proposed requirement wording in item 16 of [REP6-237].

### **Accommodation**

- 3.18 SCC proposed wording for a Workforce Accommodation Strategy in item 10 of [REP6-237] in collaboration with ESC. SCC recognises that the Applicant has included a commitment in the REAC to encourage parts of their workforce to use alternative accommodation should there be an issue with the workforce using tourism accommodation. However, SCC considers that a proactive approach should instead be taken along the lines of SCC's proposed requirement to avoid avoidable impacts on tourist accommodation occurring. Moreover, this would ensure the Applicant is able to plan ahead with the accommodation behaviours of contractors and sub-contractors, which wouldn't be possible, according to the Applicant, through its reactive commitment.

### **Health and Wellbeing**

- 3.19 SCC has submitted further detail in relation to Health and Wellbeing monitoring and mitigation, particularly for mental health, in the document titled "Suffolk NSIP Health and Wellbeing Framework" attached as Appendix B. This document is intended to provide an indicative framework which could form the basis upon

which the Applicant discharges SCC's proposed requirement for a Mental Health and Wellbeing Monitoring Plan contained within item 19 of [REP6-237] and updated at Deadline 7. This has been submitted to give an idea of what could be done under SCC's proposed requirement in terms of monitoring and mitigation for mental health.

- 3.20 The proposal details what mitigation measures may be undertaken depending on what monitoring shows is needed. These measures have been mentioned, and justified, by SCC in previous submissions, including Chapter 14 of [REP1-130], item 6.2 of SCC's written summary of oral submissions made during ISH 3 [REP6-182] and responses to Action Points 35, 44, and 45 from ISH 3 [REP6-184]. The proposals include provision for monitoring, communication and interaction with local communities including Parish Councils, and mitigation measures for mental health and wellbeing and access to healthcare, should mitigation be required.
- 3.21 The measures include indicative maximum costings to give an idea of what may be needed to deliver them depending on the results of monitoring. The Applicant may wish to make financial contributions to allow SCC to undertake these measures. Aside from the monitoring itself, the measures contained in the tables below should be read as setting out the set of potential measures which could be carried out depending on what monitoring shows to be needed. Collaborative working between SCC, the Applicant and other relevant stakeholders will ensure an effective and proportionate approach is taken.
- 3.22 SCC's position on monitoring of mental health and wellbeing is informed by evidence and existing practice, including a review on mental health impacts of NSIPs undertaken by North East London NHS Foundation Trust, attached to SCC's Health and Wellbeing Framework submitted at Deadline 7, and independent community research undertaken by the University of Suffolk in relation to Sizewell C<sup>1</sup>. The review highlights that mental health and wellbeing effects associated with major infrastructure projects may differ by stage of development and over time, and that existing assessments provide limited insight into how impacts evolve as projects progress, supporting the need for longitudinal monitoring rather than one-off assessment. The University of Suffolk's Sizewell C baseline study highlights the value of baseline and longitudinal monitoring to understand evolving community experience and concerns, recognising that perceived impacts and worries are meaningful in themselves and may change as projects progress. Monitoring is intended to

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<sup>1</sup> Baseline Report – Sizewell C Community Research and Engagement Hub: <https://sizewell.suffolk-research.co.uk/baseline-study/>

provide a baseline and track changes over time to inform mitigation, not to prove isolated causality for a single scheme.

- 3.23 The proposal is intended to sit alongside and complement what is secured in the requirement wording proposed by SCC within item 19 of [REP6-237] such that the Applicant must submit a monitoring plan for approval with SCC carrying out the monitoring funded by the Applicant. This is considered the preferred approach since SCC will be able to utilise in-house expertise and connections with relevant organisations, such as Suffolk Mind who are undertaking similar research activities, to ensure accurate results are gained and local mistrust of NSIP developers does not sway monitoring results. The same goes for measures under “Flexible community initiatives” and “Universal and targeted wellbeing support”, since SCC’s existing close ties to local communities and parishes will allow it to undertake these measures more effectively. SCC also considers that it should be responsible for convening a Health and Wellbeing Coordination Forum with promoters of NSIPs in East Suffolk due to SCC’s previous experience in similar endeavours, such as the Regional Skills Coordination Function and the fact that the Council undertakes extensive engagement with each NSIP promoter which may assist in setting up this forum.
- 3.24 A multi-sourced approach would be adopted for monitoring, drawing on a combination of population health data, primary care activity, service referral patterns, and structured engagement with Primary Care, Community Mental Health Teams and local stakeholders. This would be supplemented where appropriate, by carefully designed qualitative tools, recognising the need to minimise potential biases and ensure sufficient depth and context in responses. Monitoring should be coordinated where practicable with other NSIP promoters in the area to support a greater understanding of both project-specific and cumulative effects. Through identifying emerging patterns of concern and determining whether effects are greater than anticipated, the approach would enable timely and proportionate mitigation that would not otherwise be achievable in the absence of monitoring.
- 3.25 It should be noted that what is done under certain items depends on monitoring results, such as “Access to Healthcare”, “Flexible community initiatives” and “Universal and targeted wellbeing support”. This ensures that mitigation measures are informed, effective and proportionate to the effects which occur. Measures within the item “A Health & Wellbeing Governance Board & Forum” would allow for appropriate governance mechanisms to determine what measures are undertaken. The Health and Wellbeing Coordination Forum will allow for open dialogue between cumulative NSIP promoters in relation to Sea Link and so assist in determining what is proportionate where there is a cumulative element to the effects identified through monitoring. SCC considers

that securing these measures would ensure that the mitigation hierarchy is satisfied and the project does not pose an unacceptable risk, or interference with, human health.

- 3.26 Finally, the monitoring plan would also ensure that effects on vulnerable groups are properly monitored and mitigated. Little consideration has been given to the potential effects on the wide variety of groups which may be vulnerable to disproportionate effects, as raised by SCC in previous submissions. This includes the newly proposed SEND school in Saxmundham which will also be accompanied by a dual provision children's home on the same site. This facility is being purpose-built for children with complex needs and challenging behaviours, specifically to "improve outcomes for children deprived of their liberty".
- 3.27 This means that, aside from considerations of disruption to travel routes, into school for SEND children, noise and air quality concerns, there will also be 24/7 residential facility for some of the most vulnerable children in the county in close proximity to where work for the project will take place. While these announcements were likely made after the Applicant's EQIA was written, the developments should necessitate a reassessment of the equalities impact, specifically for those at the intersection of "children" and "disability" and there should be clear, tailored mitigations put in place. SCC's proposed requirement would ensure there is a mechanism to secure this.

### **Landscape and Visual**

- 3.28 SCC has set out in response to Action Point 45 from ISH 3 [REP6-184] how it considers that the mitigation hierarchy has not been fulfilled for Landscape and Visual, including a proposal for additional planting in Appendix C of that document. SCC recognises that some of that proposed planting is outside the Order Limits. However, the Applicant could, at minimum, include a commitment to seek landowner permission to undertake further mitigative planting. If this is not possible, then the possibility of offsetting must be explored which the Applicant has not yet discussed with SCC.
- 3.29 Although it is recognised that in strict landscape terms offsetting for the residual effects of the Fromus bridge, haul road and converter station is difficult, SCC considers that offsetting for these effects need not be restricted to landscape and visual enhancements and there is nothing in policy to restrict this as such. Alternative forms of offsetting, which are related to landscape, could be considered, such as improvements to the access to the countryside and green spaces which bring benefits to people and host communities, which will be adversely affected by the converter station construction. Therefore, the offsetting measures proposed by SCC for Public Rights of Way could be considered as an important contribution to offsetting residual landscape and visual effects, as

these measures would provide greater connectivity to the PRow network, allowing for easier access to countryside, the coast, and green spaces untouched by industrial infrastructure. Therefore, this benefit would, to a certain extent, compensate for the residual significant adverse landscape and visual effects.

- 3.30 With regards to the prescriptions in the oLEMP, SCC considers that this document has considerably improved. SCC welcomes in particular the inclusion of a temporal element to the adaptive aftercare approach allowing for aftercare periods to be paused for planting areas with significant failures to allow replacement planting to catch up. SCC has provided further comments to the Applicant between Deadline 6 and 7, several of which remain unagreed.

### **Socioeconomics and Skills**

- 3.31 SCC considers a robust Skills, Supply Chain and Employment Plan (SSCEP) is necessary to satisfy the mitigation hierarchy for the reasons given in response to Action Point 45 from ISH 3 [REP6-184]. A final version of this plan was submitted at Deadline 6 by the Applicant and SCC, along with ESC, were given the opportunity to comment on this document prior to its submission. SCC has submitted the feedback it relayed to the Applicant jointly with ESC at Deadline 7. SCC has detailed what it considers necessary to secure in such a plan in previous submissions, such as in response to 2CEInter1 of ExQ2 [REP5-204] and in response to Action Point 27 from ISH 3 [REP6-184].
- 3.32 As should be clear from the submitted feedback on the Applicant's SSCEP, SCC considers the plan as drafted to be insufficient due to the lack of inclusion of SCC's requested commitments, with the focus instead being on detailing the Applicant's existing internal commitments. The Council is therefore concerned with this document being certified, either as an outline plan referenced in Requirement 6 or a final plan detailed in Requirement 5. If the plan is considered an outline plan, then the final one will be required to be in accordance with that outline by the DCO and so without the inclusion of the commitments requested by SCC, the Applicant will not be required to produce a robust plan. In lieu of an appropriate document to be considered an outline SSCEP, SCC considers the most appropriate mechanism to secure this plan to be the requirement wording proposed within item 15 of [REP6-237] which would ensure a robust final plan is produced and approved.

### **Traffic and Transport**

- 3.33 In transport terms SCC remains concerned that the applicant has not robustly assessed the cumulative impact of NSIP projects on the local highway network. Much focus has been placed on the impact of the project in isolation without due consideration of the overall impacts. In SCC's view significant negative impacts

will occur on the A1094 corridor and potentially at locations on the A12 such as the junction with the B1119.

- 3.34 SCC does not agree that small increases in traffic at sensitive locations such as the B1121/B1119 Saxmundham crossroads or the A1094/B1069 Snape junction are not significant as these are increasing pressure on junctions that are already at or over capacity.
- 3.35 If it is considered appropriate to consent this project, then as a minimum, SCC would expect suitable caps, controls, monitoring, reporting and enforcement to be in place to provide comfort that traffic volumes will not be exceeded and hence the assessments remain valid.
- 3.36 SCC proposed what additional mitigation it considers necessary in response to 2CEInter1 of ExQ2 [REP5-204], including measures for the B1121 Benhall, B1069/A1094 corridor, A12/B1119 junction and B1121/B1119 signalised junction in Saxmundham, in addition to the A12. SCC proposed that a contingency fund could be secured in the DCO for impacts on the A12 in a similar way to the Sizewell C Deed of Obligation<sup>2</sup>. SCC has engaged further with the Applicant on this matter who has indicated that it does not consider further mitigation justified. Therefore, SCC considers that a contingency fund which can also provide for impacts on the other receptors listed by SCC as requiring mitigation would be an appropriate course of action.
- 3.37 Much data has been provided at a late stage of the examination which has stretched the authority's resources in providing adequate responses, particularly as the authority is involved in delivery of multiple sites which themselves are creating a testing environment of matching forecast traffic impacts with reality.
- 3.38 For the full log of areas of agreement and disagreement between SCC and the Applicant, please see the final Statement of Common Ground.

## 4 Design

- 4.1 SCC has worked closely with the Applicant to resolve matters relating to Requirement 3 prior to Deadline 7. Based on what SCC has been told will be updated at Deadline 7, SCC considers that much progress has been made on this issue. SCC understands that the Key Design Principles are being updated to include a procedure for Design engagement, including independent design review, for the Fromus bridge and the converter station which is welcomed by SCC. SCC also welcomes that the designs of these pieces of infrastructure will

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<sup>2</sup> <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-008240-SZC%20Co.%20-%20Final%20signed%20and%20dated%20s.106,%20final%20s.106%20Explanatory%20Memorandum%20and%20final%20Confirmation%20and%20Compliance%20Document%208.pdf>

be fully approved by the relevant planning authority and include all elements relevant to the design and external appearance of the infrastructure. Provided that the changes made to the application at Deadline 7 address SCC's requests, this item may be agreed regarding the converter station and River Fromus bridge.

- 4.2 SCC believes that disagreement remains with the Applicant around the requirement wording of 3(2) – Suffolk substation, which is currently restricted to certain elements of documents discharged under the EA2 DCO. However, SCC welcomes the ExA's proposed change to this wording which closely aligns with the wording proposed by SCC in [REP6-237] and would consider this matter resolved if that wording is incorporated into the DCO.

## 5 National Landscape

- 5.1 SCC has made several representations criticising the adequacy of the Applicant's proposal to meet the updated section 85 (A1) duty of the Countryside and Rights of Way Act 2000 (see Chapter 5 of [REP1-130], Table B5 of [REP2-062] and response to 1LVIA7 of ExQ1 [REP3-101]). SCC considers that the provision to enhance acid grassland is limited in its capacity to enhance the natural beauty of the National Landscape when compared to acid grassland creation and that 10 years of maintenance should be increased to a greater length of time such as 30 years.
- 5.2 SCC has been in discussions with the Applicant and the National Landscape team to agree terms of a s.106 Unilateral Undertaking for the Applicant to provide funds to SCC, which would then be passed on to the National Landscape Partnership, to undertake enhancement measures to meet the s.85 duty. SCC understands that this UU will also provide for the delivery costs incurred by the Partnership in addition to maintenance of the enhancement. Therefore, SCC understands that most of its concerns with the substance of this agreement are resolved.
- 5.3 However, SCC considers that the agreement should be bilateral with SCC as a signatory for reasons which include the fact that the agreement creates obligations for SCC and to ensure that the agreement is enforceable by SCC. In what follows, SCC gives an account what has been proposed by the Applicant and what SCC considers should be secured instead, including proposed wording for the DCO to secure SCC's preferred approach for a Deed of Obligation to be entered into instead.

### Legal mechanism used to secure the proposed obligations

- 5.4 NGET intend for the obligations to be provided in a unilateral undertaking entered into under section 106 of the Town and Country Planning Act 1990 ("**TCPA 1990**") as development consent obligations ("**S.85 UU**").

- 5.5 SCC understand that NGET have expressed reservations in the ability for the ExA/SofS to take the obligations into account and give them weight in the decision under paragraph 4.1.18 of the relevant NPS EN-1 if these are not secured as obligations in a unilateral undertaking entered into under section 106.
- 5.6 SCC understand that NGET do not currently own the freehold of any of the land within the Order limits required to deliver and operate the Project. Therefore, NGET do not have an “interest” in the land to which the Order relates to enable it to enter into the S.85 UU as a conventional unilateral undertaking under section 106 of the 1990 Act as section 106(1) requires.
- 5.7 Therefore, NGET are pursuing the following approach:
- 5.8 Including the following wording in paragraph 6 of Schedule 17 to the dDCO SCC expect to be submitted at Deadline 7 to deem NGET (and any transferees or lessees of the benefit of the Order under Article 7 of the dDCO) to have a “qualifying interest” in the Order Land for the purposes of section 106 of the 1990 Act and to deem transferees and lessees of the benefit of the Order under Article 7 of the dDCO as being a person “deriving title” from NGET as undertaker under the dDCO.

*“For the purposes only of Section 106(1) of that Act the undertaker shall be deemed to be a person interested in the Order Land or any part of it and for the avoidance of doubt Section 106(3)(a) shall include any transferee or lessee under Article 7 of this Order and in Section 106(3)(b) reference to any person deriving title from a person falling within Section 106(3)(a) shall include the undertaker and any transferee or lessee who has the benefit of all or part of the provisions of the Order pursuant to Article 7 of this Order.”*

- 5.9 Including an obligation in paragraph 2 Schedule 1 of the S.85 UU requiring NGET to enter into a duly executed and binding deed of undertaking under section 106 of the 1990 Act within 20 working days of NGET acquiring any part of the land comprised within Plots 1/11, 1/19, 1/20 and 1/23 to the effect that the terms of the S.85 UU bind NGET’s ownership interest in that land. NGET are to be required under paragraph 2 of Schedule 1 of the S.85 UU to provide a draft of this deed of undertaking to SCC before it is entered into.
- 5.10 NGET are only to be released from the obligations in the S.85 UU when disposing of its interest in Plots 1/11, 1/19, 1/20 and 1/23 in the in the circumstances set out at Clause 5.1 i.e. only where the Deed of Adherence required under paragraph 2

Schedule 1 of the S.85 UU is entered into under this provision. This release would not be effective for pre-existing breaches.

- 5.11 NGET take the position that it is only NGET who hold the electricity transmission licence for England and so no other entity can deliver these transmission works.
- 5.12 SCC welcomes the collaborative approach that NGET and its advisors have taken to discussions in relation to the legal mechanism which should be used to secure a financial contribution towards measures which seek to further the purposes of the Suffolk & Essex Coast & Heaths National Landscape.
- 5.13 SCC's principal and preferred position is that the obligations should be secured as a Deed of Obligation (“**DOO**”) and certain additional provisions included in the DCO to ensure that the terms of the S.85 UU are suitably enforceable by SCC. This approach has recently been taken on both the Sizewell C and Sunnica DCOs. This DOO approach would involve the following:

5.14 The following drafting in the S.85 UU:

- i. For Clause 1 to document that the document is made pursuant to section 1 of the Localism Act 2011, section 111 of the Local Government Act 1972 and all other powers so enabling.
- ii. A definition of “Undertaking” to be added as follows: *means the benefit of the Order to construct, operate and/or maintain the works set out in Schedule 1 to the Order.*
- iii. Clause 5.1 to be revised so that NGET would be released from its obligations in the document (save for pre-existing breaches) on transfer of the entirety of its benefit of the Order, because the DCO provisions listed below would make the document automatically binding against transferees and lessees of the benefit of the Order.

5.15 The following drafting in the DCO:

- i. New definition of “Deed of Obligation” as follows added to Article 2:

*“Deed of Obligation” means the Deed of Obligation entered into by National Grid Electricity Transmission plc for the benefit of Suffolk County Council dated [       ] 2026 including any variation of that Deed*

- ii. The definition of “Undertaker” in Article 2 should be varied as follows to ensure successors to the undertaking are included:

*“the undertaker” means National Grid Electricity Transmission plc (registered company number 2366977) **or any person who has the benefit of this Order in accordance with articles 6 (benefit of Order) and 7 (Consent to transfer benefit of Order)***

- iii. New paragraph (7) to be added to Article 7 as follows:

*(7) The obligations of the undertaker under the Deed of Obligation are enforceable in accordance with article [XX] (Enforcement and Modification of the Deed of Obligation) against the undertaker and any person to whom the power to construct, operate or maintain the authorised development in the area in which the Suffolk & Essex Coast & Heaths National Landscape is located has been transferred or granted under this article for so long as that person benefits from the power to construct, operate or maintain any of that part of the authorised development, and such transferee or lessee shall be treated for all purposes as the undertaker who entered into the Deed of Obligation with the other parties to it.*

- iv. New Article to be added to the DCO as follows:

***Enforcement and Modification of the Deed of Obligation***

***XX.-(1) The terms of the Deed of Obligation are enforceable by injunction.***

*(2) The Deed of Obligation shall be a local land charge in respect of all freehold or leasehold interests in land owned by the undertaker within the Order limits and for the purposes of the Local Land Charges Act 1975 the authority by whom the obligation is enforceable shall be treated as the originating authority as respects such a charge.*

*(3) An obligation in the Deed of Obligation may not be modified or discharged except—*

*by agreement between the undertaker and the beneficiary of the obligation, executed as a deed; or further to a determination by the Secretary of State under this article.*

*(4) The undertaker may, at any time after the expiry of the period of five years beginning with the date on which the Deed of Obligation was first entered into, apply to the Secretary of State for the obligation—*

*(a) to have effect subject to such modifications as may be specified in the application; or to be discharged, and must notify Suffolk County Council (or successor authority) as soon as any such application is made.*

*(5) An application under paragraph (4), for the modification of an obligation in the Deed of Obligation may not specify a modification imposing an obligation on any other person against whom the Deed of Obligation is enforceable.*

*(6) Where an application is made to the Secretary of State under paragraph (4), the Secretary of State must consult Suffolk County Council (or successor authority) taking into account their responses, may determine—*

*that the obligation shall continue to have effect without modification;*

*if the obligation no longer serves a useful purpose, that it shall be discharged; or*

*if the obligation continues to serve a useful purpose, but would serve that purpose equally well if it had effect subject to the modifications specified in the application, that it shall have effect subject to those modifications, and shall give notice of their determination to the applicant and Suffolk County Council (or successor authority) within three months of the application and provide full reasons for the decision.*

*(7) Where the Secretary of State determines under this article that an obligation shall have effect subject to modifications specified*

*in the application, the obligation as modified shall be enforceable as if it had been entered into on the date on which notice of the determination was given to the applicant and Suffolk County Council (or successor authority) or such other date as the Secretary of State may determine.*

*(8) An application to the Secretary of State under paragraph (4) shall include the following information—*

*the name and address of the undertaker;*

*sufficient information to enable identification of the obligation which the undertaker wishes to have modified or discharged;*

*the undertaker's reasons for applying for the modification or discharge of that obligation; and*

*such other information as the Secretary of State considers necessary to enable them to determine the application.*

*(9) When the Secretary of State receives an application for the modification or discharge of an obligation under paragraph (4) the undertaker shall arrange for the application to be publicised by—*

*posting notice of the application on or near the land to which the obligation relates for not less than 21 days; or*

*publishing notice of the application in a local newspaper circulating in the locality in which that land is situated and on the undertaker's website.*

*(10) The notice referred to in paragraph (9) must include the name of the undertaker, details of the obligation that is proposed to be modified or discharged, an address or website where members of the public may inspect copies of the application, the address or email address to which any person who wishes to make a representations may write, and a date (no later than 21 days beginning on the date that the notice is posted or published) by which such representations should be made to the Secretary of State.*

*(11) Section 84 of the Law of Property Act 1925 (power to discharge or modify restrictive covenants affecting land) does not apply to an obligation in the Deed of Obligation.*

- v. Completed version of the Deed of Obligation to be added to Schedule 19 as a Certified Document.

- 5.16 Without prejudice to SCC's principal position, SCC has the following observations on the position taken by NGET in relation to the legal mechanism used to document a financial contribution towards measures which seek to further the purposes of the National Landscape:
- 5.17 SCC are not convinced that obligations entered into in a DOO rather than a unilateral undertaking or bilateral agreement entered into under section 106 are not being capable of being given weight in the decision. It is considered that such should be taken into account as an "any other matter" the SofS thinks are both important and relevant to the SofS's decision under section 104(2)(d) of the 2008 Act for cases where an NPS has effect.
- 5.18 The obligations will only be tied to and "run with" any land if NGET acquires a part of Plots 1/11, 1/19, 1/20 and 1/23. At this stage, SCC cannot guarantee that NGET will acquire such land.
- 5.19 Save for the provision discussed below (and subject to the commentary on this below), if NGET transferred the benefit of the Order and did not first acquire a part of Plots 1/11, 1/19, 1/20 and 1/23 the terms of the S.85 UU would only be binding on NGET as a contract between SCC and NGET.
- 5.20 As far as SCC are aware, the wording now proposed for paragraph 6 of Schedule 17 of the dDCO to deem section 106(3)(b) as having the effect of making the S.85 UU binding on the undertaker *and any transferee or lessee who has the benefit of all or part of the provisions of the Order pursuant to Article 7 of the Order* has not been utilised in previous DCOs. This is wording which has been included at SCC's request without prejudice to SCC's principal position above but SCC highlight that the DCO drafting used in SCC's principal position has been tested before during DCOs as explained above. If this wording is not effective, the terms of the S.85 UU will not be automatically binding against the any transferee or lessee who has the benefit of all or part of the provisions of the Order pursuant to Article 7 of the Order.
- 5.21 SCC consider that the NGET's approach would not suitably operate to allow for enforcement under s.106(6) (i.e. to allow for a local planning authority to enter land and carry out works and then recover costs from the undertaker) as there is no guarantee any land would ultimately be bound and (unless a deed of adherence or similar was entered into in due course) the obligations would not attach to any particular land. However, in the context of this particular UU this is not a concern to SCC as the S.85 UU does not secure any obligations to carry out works etc. so there would never be a need for SCC to enter land and carry out works that would otherwise have been required of NGET under the terms of the S.85 UU.

**Monitoring fees:**

- 5.22 SCC's policy is to secure a monitoring fee of £577 for each trigger point in a planning obligation which should be payable on the completion of the obligation.<sup>3</sup>
- 5.23 In this case the S.85 UU secures a single £577 monitoring fee towards SCC's costs of monitoring performance of the obligation at paragraph 3 of Schedule 1 of the S.85 UU.
- 5.24 However, no monitoring fee is secured in relation to SCC's costs of monitoring the performance of the obligation at paragraph 2 of Schedule 1 requiring NGET to secure a duly executed Deed of Adherence is entered into.

## 6 Development Consent Order

- 6.1 SCC recognises the Examining Authority's schedule of proposed changes to the DCO and notes that changes associated with some of SCC's key concerns have been made. SCC has responded to that document in its responses to Deadline 6 submissions. Where relevant to the outstanding issues set out in this section, the ExA's proposed changes are referenced.

**Core Working Hours**

- 6.2 The Applicant has maintained its position that extended working hours are justified throughout the examination. SCC has made several submissions opposing the Applicant's position throughout the examination, including proposed rewording of Requirement 7 in [REP6-237]. The Council welcomes the ExA's proposed restriction of Core Working Hours in line with those recommended by SCC. It is worth pointing out that SCC recommended changes in wording to subparagraph (g) of 7(4) and to paragraph 7(5) in collaboration with ESC. The first change would ensure, as far as possible, that (g) is only invoked to work outside of Core Working Hours where necessary. The Council originally based its wording on that included in the Bramford to Twinstead DCO before refining it at Deadline 6 to better secure this goal. Similarly for 7(5), SCC had previously suggested the Bramford to Twinstead DCO wording in its LIR [REP1-130] and has since collaborated with ESC who endorses the wording included in [REP6-237] which SCC supports as ESC is the relevant local authority for noise and vibration matters. Were these changes incorporated into the ExA's proposed wording for Requirement 7, SCC would consider its outstanding concerns with working hours to be resolved.

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<sup>3</sup> See: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk>

#### **Schedule 4 (Discharge of Requirements)**

- 6.3 SCC provided revised wording for Schedule 4 in [REP6-237] and updated this in response to the ExA's Rule 17 letter. SCC welcomes the change from 35 to 56 days for discharging requirements proposed by the ExA and directs readers to chapter 15 of SCC's LIR [REP1-130] for SCC's full position on why the Applicant's proposed Schedule 4 is inadequate.

#### **Requirements proposed by SCC**

- 6.4 SCC proposed additional requirements in [REP6-237] which are discussed in what follows. Requirements proposed in that document to resolve SCC's outstanding concerns with the satisfaction of the mitigation hierarchy are not also discussed in this section.

#### **Revised Requirement 15 wording**

- 6.5 SCC proposed revised wording to Requirement 15 in response to 3GEN27 of ExQ3 in item 14 of [REP6-237]. In response to the ExA's Rule 17 letter, SCC has updated its proposed wording for this requirement.

#### **Cable Ducts**

- 6.6 SCC proposed additional requirements in item 17 of [REP6-237] to secure the coordinated laying of Lion Link's cable ducts, should Lion Link be consented before Sea Link's cable laying works commence. This would ensure the avoidable impacts of duplicated open cut trenching is avoided by having Sea Link lay Lion Link's cable ducts, similar to Requirement 42 of the EA1N and EA2 DCOs.

#### **Permitted Development Rights**

- 6.7 SCC and ESC collaborated to form the wording contained in item 18 of [REP6-237] which is based on Requirement 44 of EA1N and EA2 DCOs. SCC set out its justification for this requirement in [REP5-181] which references the recommendation report for those DCOs and contends that the requirement is necessary to ensure that essential landscape and drainage mitigation is not undermined by the exercise of Permitted Development rights.

#### **Friston substation**

- 6.8 SCC proposed a general requirement in relation to the Suffolk substation in [REP5-181] which SCC updated in item 20 of [REP6-237] to ensure it covers each phase of development.

#### **Emergency Planning**

- 6.9 A requirement for the DCO, and a commitment for the REAC regarding pre-commencement operations, was proposed by SCC in item 21 of [REP6-237]. SCC stated in Chapter 15 of its LIR [REP1-130] that an emergency planning

requirement of a similar kind to the SPR requirement 33 would be necessary for Sea Link given the project's proximity to the Outline Emergency Planning Zone of Sizewell B. The rationale for the proposed wording here is unchanged, although the required detail to be submitted under this requirement has been further specified for precision and to ensure that SCC as the Duty Holder can fulfil its obligations under the Radiation (Emergency Preparedness and Public Information) Regulations 2019.

## **7 Coordination with Other NSIP Projects**

- 7.1 Aside from SCC's proposed requirement for coordination of cable duct laying with Lion Link, several other proposals from SCC aim to ensure opportunities for coordination between cumulative developments are sought. This includes the establishment of working groups associated with tourism monitoring and mental health monitoring which could include representatives from undertakers of other NSIPs in the region. SCC considers that the Applicant should seek to participate in groups like this with promoters of other NSIPs where there are opportunities for coordination to minimise adverse impacts. This includes Traffic and Transport and Public Rights of Way, for which the Applicant has stated that effects could be reduced through coordination but has not included commitments to secure that it will use best endeavours to set up, or join, appropriate governance arrangements. SCC considers that there may be opportunities to join certain Sizewell C governance groups should the existing parties agree. If Sea Link are unable to join these groups, then the Applicant should work collaboratively with the promoters of other NSIPs to create forums where coordination can be achieved together with the relevant local authorities whose input will be valuable in this endeavour.

## **8 Other technical matters**

### **Water Environment**

- 8.1 The remaining key outstanding issues concern the sequential and exception test and the drainage solution located in Flood Risk 3. This drainage solution, as of Deadline 6, is unacceptable as it is located in Flood Zone 3 and so will increase flood risk, especially when considering the flood risk from the River Fromus and from surface water. This issue was raised by SCC and other interested parties at ISH 3 and SCC understands that the Environment Agency has made submissions setting out this issue in detail which SCC is in support of.
- 8.2 SCC has raised concerns with the Applicant's sequential and exception test as contained within the Flood Risk Assessment. SCC raised these concerns in

response to Action Point 86 from ISH 2 [REP4-150], in response to Action Point 4 of ISH 3 [REP6-183] and in SCC's post-hearing submission from ISH 3 [REP6-182]. This is because the Applicant may locate the temporary storage of materials which could be at medium/high risk of flooding. Moreover, the drainage solution in Flood Zone 3 by the B1121 will also increase risk of flood and it has not been demonstrated that this must be located in Flood Zone 3. SCC suggested that sustainability benefits could be secured to outweigh this increase in flood risk to satisfy paragraph 5.8.11 of EN-1. SCC has provided drafting for a requirement to secure this in response to the ExA's Rule 17 letter.

### **Archaeology**

- 8.3 A final, approved version of the Outline Onshore Overarching Written Scheme of Investigation (OWSI) for Suffolk remains outstanding, with comments set out by SCCAS at Deadline 6 (REP6-141) needing to be addressed to enable agreement of this key document and to ensure that ongoing archaeological evaluation and mitigation provisions are suitable and robust. SCC understands that amendments to this document have been made at Deadline 7 to resolve the Council's concerns.
- 8.4 Although SCCAS are generally satisfied with the wording of Requirement 14 (Archaeology), we remain concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. As such, SCCAS would continue to advise that Requirement 14 (4) needs to be updated in line with the suggested wording set out in REP6-141 and as supported by the ExA in their Schedule of recommended amendments to the dDCO.

### **Ecology**

- 8.5 Although SCC Ecology are generally satisfied with the survey effort to date, more surveys are required, particularly around Benhall Bridge if works are to take place at this location. Surveys for bats (activity), badger and dormice are recommended for the vegetated railway corridor if there are works proposed that will impact the vegetation along the railway embankments.
- 8.6 With regard to the delivery of biodiversity net gain, SCC Ecology would like to be kept up to date on how this is proposed. SCC Ecology expect much of the BNG

will have to be delivered through the purchase of offsite credits and these ideally should be located in East Suffolk, and as close to the DCO boundary as possible.

## Public Health

- 8.7 Public Health welcomes the Applicant's proposed REAC commitment [REP6-135] HW02 but consider that the current drafting requires refinement to ensure that the proposed actions and commitments are capable of meaningfully mitigating impacts on mental health and wellbeing over a prolonged construction programme. As currently framed, the text appears largely reactive and process focused. Public Health has therefore proposed revisions to strengthen clarity around roles, expectations, and delivery mechanisms with a particular emphasis on enabling proactive, consistent, and accessible engagement with affected communities.
- 8.8 Public Health's position on health and wellbeing matters arising from the Equality Impact Assessment [APP-362] has been further refined, informed by consideration of the Public Sector Equality Duty. Whilst the identification of protected and potentially affected groups is acknowledged, Public Health remains concerned that the EqIA functions largely as a static snapshot and does not provide sufficient assurance that identified equality impacts, particularly in relation to mental health and wellbeing, will be actively monitored, reviewed, or addressed over time. Public Health does not consider that the ongoing and non-delegable nature of the Public Sector Equality Duty is sufficiently reflected through secured mechanisms for monitoring, feedback, and adaptive mitigation. Given the potential for changing local circumstances and heightened impacts on groups experiencing intersecting vulnerabilities, Public Health considers it essential that proactive monitoring arrangements are secured through the DCO to ensure equality and health impacts are kept under review and responded to in a timely and proportionate manner throughout construction.

## Socioeconomics

- 8.9 SCC's remaining concerns in respect of skills, education and employment relate specifically to the cumulative effects arising from the overlap of Sea Link with other Nationally Significant Infrastructure Projects (NSIPs) in Suffolk. The concentration, scale and temporal overlap of these schemes, most notably alongside Sizewell C, create a materially different labour-market context to that experienced by standalone developments and give rise to genuine cumulative pressures on the availability of skilled and semi-skilled labour during the construction phase.

- 8.10 SCC considers that the Applicant’s assessment of labour-market sensitivity and workforce availability understates the scale of these cumulative effects and does not reflect a reasonable worst-case scenario. In particular, the classification of the local labour force as being of low sensitivity, combined with reliance on broad travel-time assumptions and average workforce figures, fails to adequately capture peak workforce demand, overlapping construction programmes, existing and forecast skills shortages, or the specialist nature of many of the roles required. SCC therefore considers that the potential magnitude of workforce displacement, churn and competition is likely to be greater than assessed.
- 8.11 Notwithstanding these concerns, SCC maintains that skills, education and employment impacts are not inherently unacceptable. The Council’s consistent position throughout the Examination has been that such impacts are capable of being mitigated, provided that appropriate, targeted and enforceable measures are secured. SCC has therefore focused its engagement on identifying a proportionate mechanism to manage risk and to support positive outcomes for Suffolk’s communities and economy, rather than opposing the principle of development.
- 8.12 Central to SCC’s position is the role of a Skills, Supply Chain and Employment Plan (SSCEP). While SCC recognises the appropriateness of an SSCEP as the primary mechanism for addressing skills and employment issues associated with the project, it does not consider the version submitted by the Applicant at Deadline 6 to be adequate. In SCC’s view, the document relies predominantly on existing corporate social value commitments, does not sufficiently address cumulative labour-market pressures, and lacks the governance, monitoring and adaptive management arrangements necessary for it to function effectively as mitigation in the Suffolk context.
- 8.13 SCC is particularly concerned that the submitted SSCEP, if treated as either an outline or final plan under the draft Development Consent Order, would limit the ability to secure a more robust and responsive approach post-consent. Given the evolving nature of workforce demand across multiple NSIPs and the likelihood of further change over time, SCC considers that a more flexible but enforceable mechanism is required. For this reason, SCC continues to support the alternative DCO requirement proposed, which would secure the preparation and approval of a comprehensive SSCEP post-consent, informed by up-to-date workforce information and developed in consultation with SCC through the Regional Skills Coordination Function.
- 8.14 SCC has also made clear that, while not all detailed information may be available during the Examination, this does not prevent resolution of the issue. SCC considers that its outstanding concerns would be addressed either through the

submission of a sufficiently detailed SSCEP prior to the close of the Examination, or through an Outline SSCEP secured via the DCO with clear, enforceable commitments to deliver a fully detailed plan post-consent. In SCC's view, either approach would enable cumulative impacts to be actively managed and would address the limitations identified in the assessment.

- 8.15 SCC further emphasises that skills, education and employment legacy outcomes must not be treated as community benefits. In the context of cumulative NSIP activity in Suffolk, measures to support local skills development, workforce retention and supply-chain resilience are integral to mitigating foreseeable construction-phase impacts, including workforce displacement and churn. These outcomes are therefore necessary to make the development acceptable in planning terms and must be embedded within the SSCEP as mitigation, rather than addressed through voluntary programmes.
- 8.16 Finally, SCC notes that, following further review, it accepts the Planning Inspectorate's scoping opinion in relation to operational employment effects. The operational workforce associated with the Proposed Development is small and unlikely to give rise to meaningful socio-economic impacts. Accordingly, SCC's concerns relate solely to the construction phase and its cumulative effects, and SCC considers operational employment effects to be resolved.
- 8.17 Subject to the securing of an appropriately strengthened and enforceable SSCEP through the Development Consent Order, SCC considers that the socio-economic impacts of the project in relation to skills, education and employment would be capable of being mitigated. In the absence of such provisions, SCC maintains that the Applicant has not yet demonstrated that the cumulative labour-market impacts arising from the project have been satisfactorily addressed.



## **10 Appendix B: Indicative Proposal for Health and Wellbeing Monitoring**

# Suffolk NSIP Health and Wellbeing Framework

## Context

Suffolk County Councils Public Health Directorate undertook an evidence review on 26th March 2026 to examine known mental health impacts of Nationally Significant Infrastructure Projects (NSIPs)<sup>1</sup>. This highlights that mental health and wellbeing impacts arise not only from construction impacts but from the planning and consenting process itself, especially where communities experience uncertainty, low perceived control and poor trust. A relational, continuous engagement approach can therefore function as primary mitigation by increasing perceived control, inclusion and participation and reducing distress.

Under the Planning Act 2008, promoters of Nationally Significant Infrastructure Projects (NSIPs) are required to undertake statutory pre-application consultation as part of the Development Consent Order (DCO) process. This includes consultation with local authorities and affected communities, supported by statutory publicity and reporting requirements. These requirements establish a statutory minimum for community engagement focused on procedural compliance and informing decision-making.

Suffolk County Council's own Community Engagement and Wellbeing Guidance (2024)<sup>2</sup> sets out a need for project promoters to go beyond statutory minimums, ensuring procedural fairness, safeguarding community wellbeing, and supporting parish/town councils through complex NSIP processes. Recent Community Studies undertaken by the University of Suffolk demonstrate the value of engagement through surveys and independently facilitated focus groups in understanding how communities are experiencing Sizewell C, including anticipated future concerns as well as current impacts<sup>3</sup>

This Community Engagement Framework is intended to inform pre application discussions, Statements of Community Consultation, and supplementary engagement commitments secured through the DCO process where appropriate, particularly where projects are prolonged, complex or have cumulative impacts.

The measures include indicative maximum costings to give an idea of what may be needed to deliver them depending on the results of monitoring. The Applicant may wish to make financial contributions to allow SCC to undertake these measures. Aside from the monitoring itself, the measures contained in the tables below should be read as setting out the set of potential measures which could be carried out depending on what monitoring shows to be needed. Collaborative working between SCC, the Applicant and other relevant stakeholders will ensure an effective and proportionate approach is taken.

## Key mechanisms of impact

- Uncertainty and prolonged decision timelines contribute to anxiety, frustration and reduced ability to plan for the future.

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<sup>1</sup> North East London NHS Foundation Trust (NELFT) Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) – conducted March 2026 (**embedded at end of document**)

<sup>2</sup>Suffolk County Council (2024) Community Engagement and Wellbeing Guidance [community-engagement-and-wellbeing-policy](#)

<sup>3</sup> [Baseline Report – Sizewell C Community Research and Engagement Hub](#)

- Perceived procedural unfairness and limited influence can lead to disempowerment, mistrust and disengagement.
- Impacts are uneven: spatial clustering and pre-existing inequalities mean some places and groups experience disproportionately worse wellbeing outcomes.
- Disengagement and/or fatigue is itself a risk: without active support, local voices can be excluded from complex NSIP processes.
- Longitudinal monitoring is needed: wellbeing impacts vary across phases; without monitoring, harms can go unseen until escalation.

The principles below are intended to guide the design and delivery of community engagement across all NSIPs in Suffolk and apply throughout the project lifecycle, particularly where impacts are prolonged, cumulative or uncertain.

<b>Key Principles</b>
<b>Proportionality and cumulative awareness</b>
Engagement should be proportionate to the scale, duration and cumulative impacts of NSIPs, including where multiple projects affect the same communities.
<b>Procedural fairness and transparency</b>
Communities should understand how decisions are made, how their views are considered, and receive clear feedback on outcomes (e.g. “you said, we did”).
<b>Continuity of relationships</b>
Engagement should be relational and continuous across project phases, avoiding repeated resets that erode trust and wellbeing.
<b>Inclusion and accessibility</b>
Engagement should actively include seldom-heard groups and those excluded by digital, social or health barriers.
<b>Early identification and mitigation of wellbeing impacts</b>
Mental health and wellbeing impacts should be anticipated, monitored and addressed early, rather than responded to only once concerns escalate.

Informed by the mechanisms of impact, and guided by these principles, the following engagement actions in the Monitoring Framework set out Suffolk County Council’s expectations for enhanced community engagement for all NSIPs. The framework includes required measures considered necessary to provide the evidence and governance to ensure mitigation is informed, rather than applied as blanket interventions without reference to local or evolving impacts.

The Monitoring Framework provides a baseline, early warning and adaptive management across the project lifecycle with the Relationship Manager, Community Panels, and Governance Boards/Forums intended to provide continuity, improve accessibility and increase perceived control and legitimacy. Information gathered on a regular and iterative basis will inform the mitigations and enhancements and a range of suggested, but not definitive measures are included below to support communities, dependant on the impact(s) experienced. The enhanced measures are designed to be iterative and will be refined based on ongoing monitoring and community feedback.

The framework provides a central location for required and enhanced measures, some of which will be provided by the applicant, therefore come without cost, and some where funds will be collected by the local authority and used or distributed appropriately.

Action	Purpose and Expectations	Indicative Resourcing (for scaling)
<b>REQUIRED ACTIVITY – The Applicant shall commit to the following as minimum required measures</b>		
<b>1. Mental Health (MH) &amp; Wellbeing Monitoring Framework</b>	<p>Research, develop &amp; implement a proportionate MH and wellbeing monitoring framework to detect and respond to wellbeing impacts across the construction phase across places/groups, and where applicable, to combine or align with wellbeing monitoring being conducted by other NSIP community engagement managers or promoters in the area.</p> <p>To include (indicative):</p> <p><b>Design of framework and baseline engagement (one-off)</b></p> <ol style="list-style-type: none"> <li>1. Establish baseline objectives e.g. <ul style="list-style-type: none"> <li>- existing mental health and wellbeing status,</li> <li>- identify vulnerable groups and pressure points</li> <li>- enable detection of change over time</li> </ul> </li> <li>2. Compile population &amp; service-level data for triangulation (desk-based) e.g. <ul style="list-style-type: none"> <li>- JSNA indicators that recognise population mental health needs extend beyond diagnosed illness to include prevention, early identification, and support for people at risk of poorer outcomes.</li> <li>- Population Health Management (PHM) trends</li> <li>- Baseline referral volumes to social prescribing &amp; community MH services</li> </ul> </li> <li>3. Community Wellbeing Snapshot (primary data) using evidence-aligned options e.g. <ul style="list-style-type: none"> <li>- Short, locality specific wellbeing survey e.g. Suffolk Mind Emotional Needs Audit</li> <li>- Focus on constructs identified in NSIP evidence e.g. <ul style="list-style-type: none"> <li>▪ Perceived control</li> <li>▪ Sense of security</li> <li>▪ Trust in institutions</li> <li>▪ Sleep and stress</li> </ul> </li> </ul> </li> <li>4. Qualitative baseline engagement e.g. <ul style="list-style-type: none"> <li>- Focus groups/structured interviews with parish councils, community leaders, residents</li> <li>- Used as both a data collection method and an intervention in itself (relational mitigation, procedural fairness)</li> </ul> </li> </ol> <p><b>Follow up monitoring (yearly)</b></p> <ol style="list-style-type: none"> <li>5. Establish frequency and duration e.g.</li> </ol>	<p><b>Up to £65K for year one and up to £40K for subsequent years</b></p> <p><b>This is based on 6 parishes</b></p> <p><b>(£25K set up cost plus £5-6K per year per parish for follow up with a combined yearly report at £8K)</b></p>

	<ul style="list-style-type: none"> <li>- Construction phase (and early operation/decommissioning as relevant)</li> <li>- Regular review points e.g. 6 monthly or yearly)</li> <li>- Explicit reporting points</li> </ul> <p>6. Ongoing monitoring components e.g.</p> <ul style="list-style-type: none"> <li>- Repeat PHM and referral trend analysis to identify any change from baseline</li> <li>- Repeat community wellbeing surveys for comparability to track cumulative and prolonged impacts</li> <li>- Qualitative lived experience tracking &amp; focus groups in hotspots;</li> </ul> <p>7. Engagement quality metrics (reach, inclusivity, response times, closure of actions);</p> <p>8. Public ‘wellbeing dashboard’ updated quarterly;</p> <p>9. An escalation pathway if indicators worsen (additional engagement, targeted support, independent review).</p> <p>Where multiple NSIPs operate within overlapping geographies or timeframes, monitoring approaches should be combined or aligned insofar as practicable to enable a consistent and cumulative approach to monitoring. This supports earlier identification of additive and interacting impacts on wellbeing that may not be apparent through project-specific monitoring alone, reducing the risk that impacts are underestimated, misattributed, or only recognised at the point of escalation.</p> <p>Aligned and collaborative monitoring also reduces duplication and consultation burden for communities experiencing multiple NSIP pressures, helping to sustain engagement, trust and procedural fairness over prolonged timescales. Shared approaches support clearer attribution and escalation of concerns, enabling promoters to respond more effectively where impacts arise from overlapping or successive projects. Greater consistency and comparability of wellbeing data across projects and phases further strengthens transparency and confidence in monitoring, reporting and decision-making for communities, promoters and regulators.<sup>4,5</sup></p>	
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<sup>4</sup> Planning Inspectorate (2025). *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment*.

<sup>5</sup> Suffolk County Council (2024) Community Engagement and Wellbeing Guidance <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

	<p>Where monitoring or engagement activity indicates wellbeing impacts attributable to another NSIP, a clear cross-promoter referral mechanism should be triggered via Community Relationship Managers, ensuring concerns are addressed by the relevant promoter without duplication or additional burden to communities. Promoters should therefore consider, at an early stage, how monitoring approaches will align with other NSIPs where communities, timeframes or impacts could overlap</p>	
<p><b>2. Core staffing for NSIP Community Relationship Manager</b></p>	<p>Appoint a dedicated Community Relationship Manager either embedded within SCC's Growth, Highways and Infrastructure Directorate (NSIPs team), similar local government organisation, or local Voluntary, Community, Faith, and Social Enterprise (VCFSE) organisation to provide visible, consistent, two-way engagement across phases of the NSIP (site options, pre-application, examination and early operation). Role to include (as a minimum):</p> <ol style="list-style-type: none"> <li>1. Support the promoter with comms, to ensure information is made available to all groups, and to directly engage with seldom heard &amp; vulnerable groups</li> <li>2. Work collaboratively with a range of partners including (but not limited to) community members, local parish and town councils, Suffolk Association of Local Councils (SALC), NSIP promoters, district &amp; county councils, VCFSE sector. This collaborative work could include for example, understanding the wellbeing concerns of partners, linking to the promoters communities teams, offering signposting to local support</li> <li>3. Support the promoter with designing and delivering engagement that increases perceived control, inclusion and participation;</li> <li>4. Maintain a log of community issues/commitments and ensure feedback loops ('you said, we did');</li> <li>5. Convene and support the Community Panels and Parish/Town Council support offer (<i>see next section</i>);</li> <li>6. Support the development and implementation of mental health and wellbeing monitoring and reporting.</li> <li>7. Participate in a Suffolk NSIP Health &amp; Wellbeing Coordination Forum to share intelligence, align community engagement approaches, and support consistent monitoring of mental health and wellbeing impacts across concurrent NSIPs.</li> <li>8. Operate a clear referral and escalation mechanism where community wellbeing concerns are identified as arising from, or compounded by, another NSIP, ensuring concerns are directed to the appropriate promoter or relationship manager, and/or brought to the Manager forum.</li> </ol>	<p><b>£17.5k p.a.</b> incl. recruitment + on-costs for approx. 0.25 FTE</p>

<p><b>3. Community Panels</b></p>	<p>Establish standing Community Panel(s) to provide an ongoing deliberative forum that strengthens perceived fairness and ‘procedural justice’ and supports the work of Sea link’s Community Liaison Officer/Relationship Manager. Example members might include local residents, Parish Councillors, VCFSE organisations such as Suffolk Energy Action Solutions (SEAS), East Suffolk Communities Action Partnership (ESCAP), Suffolk Mind, University of Suffolk</p> <p>Operate as a multi-site panel (with local break-outs as &amp; when required), meeting quarterly with published agendas and minutes.</p> <p>Panel to: (example list)</p> <ol style="list-style-type: none"> <li>1. Shape community engagement methods, ensuring accessibility;</li> <li>2. Review key materials before public release, e.g. communications, monitoring outputs, shaping wellbeing initiatives;</li> <li>3. Track commitments/benefits;</li> <li>4. Provide structured feedback to promoter and SCC; and</li> <li>5. Co-design wellbeing monitoring questions and reporting formats.</li> </ol>	<p><b>£10k p.a.</b> (venue, access support, travel, facilitation materials)</p> <p>To be delivered by Community Relationship Manager</p>
<p><b>4. A Health &amp; Wellbeing Governance Board &amp; Forum</b></p>	<p><b>A. Scheme-specific Board</b> <b>Project Health and Wellbeing Governance Board</b></p> <p>The Applicant shall jointly establish with Suffolk County Council, and maintain, a Project specific Health and Wellbeing Governance Board to oversee delivery of the monitoring framework, review findings, and agree proportionate mitigation responses in accordance with the commitments set out in this document. The Board shall include the Applicant, Suffolk County Council, East Suffolk Council and may include other relevant partners where appropriate to identified impacts e.g. Integrated Care Board (ICB), VCFSE organisations. The Board shall provide scheme-specific accountability</p> <p><b>B. Cross-NSIP forum (funded jointly by Applicants)</b> <b>Suffolk NSIP Health &amp; Wellbeing Coordination Forum</b></p> <p>Where multiple Nationally Significant Infrastructure Projects affect overlapping communities or timeframes, the Applicant shall participate in the Suffolk NSIP Health &amp; Wellbeing Coordination Forum, convened by Suffolk County Council or suitable VCFSE provider</p> <p>The Forum shall:</p> <ul style="list-style-type: none"> <li>- enable sharing of relevant monitoring findings and engagement intelligence;</li> <li>- support identification of cumulative or interacting impacts;</li> </ul>	<p><b>N/A</b> <b>Governance Board to be delivered by Applicant</b></p> <p><b>Up to £15K p.a. for cross-NSIP forum (split across promoters)</b></p>

	<ul style="list-style-type: none"> <li>- promote alignment of engagement and mitigation approaches where appropriate; and</li> <li>- reduce duplication and consultation fatigue for affected communities.</li> </ul> <p>The Forum shall be independently chaired to provide a neutral, credible mechanism for coordination across multiple projects and applicants. This helps to build trust and reduce perceived power imbalances, strengthening the legitimacy of the forum as a shared governance space rather than developer led engagement mechanism. The chair will facilitate effective discussion in line with standard chairing duties, and can add value by summarising cross-cutting themes, risks, good practice, and emerging concerns for onward awareness.</p> <p>The reasonable costs of chairing, administration and operation of the Forum shall be met by participating Applicants on a proportionate basis and shall be additional to scheme-specific governance arrangements.</p> <p>The Project-specific Board provides scheme-level accountability, while the Coordination Forum provides cross-scheme alignment where cumulative impacts may arise.</p> <p>These governance arrangements are not intended to be static and are expected to adapt over time in response to monitoring findings, cumulative pressures and the lived experience of affected communities.</p>	
<p><b>ENHANCEMENTS/MITIGATIONS</b></p> <p><b>Monitoring-based triggers</b></p> <p>The monitoring framework alongside the additional required measures are intended to identify when further or enhanced mitigation should be considered. Triggers apply across the mitigation framework and determine when action is required to be considered, while the categorisation of measures determines the strength of expectation attached to that action.</p> <p>Triggers may arise where monitoring, engagement or qualitative evidence identifies one or more of the following:</p> <ul style="list-style-type: none"> <li>• deterioration in community wellbeing indicators relative to baseline, including sustained stress, fatigue or sleep disturbance;</li> <li>• evidence of cumulative or prolonged impacts arising from construction activity or interaction with other NSIPs;</li> <li>• qualitative evidence from residents, parish councils or community panels indicating heightened distress, disengagement or loss of trust;</li> <li>• disproportionate impacts on vulnerable groups or communities with a higher concentration of vulnerable receptors; and/or</li> <li>• barriers to accessing essential services, including healthcare, attributable to construction activity, diversions or extended working hours.</li> </ul> <p>Triggers should be assessed on the basis of trend, persistence, severity or clustering of impacts, rather than isolated incidents, and reviewed through the established governance arrangements at defined intervals.</p> <p><b>A selection of the following measures would normally follow once triggers are met, though some measures i.e. universal wellbeing support would be considered beneficial as a precautionary measure alongside monitoring</b></p> <p><b>Process &amp; engagement-based mitigations</b></p> <ol style="list-style-type: none"> <li>1. Respite based mitigation - Adjustments to construction practices (hours, sequencing, communications)</li> </ol>		

<p>2. Access to Healthcare</p> <p><b>Community capacity &amp; resilience mitigations</b></p> <p>3. Support for parish councils and/or community representatives</p> <p><b>Wellbeing and resilience support</b></p> <p>4. Universal and targeted wellbeing support</p> <p><b>Place-based community initiatives</b></p> <p>5. Small scale community wellbeing initiatives (place-based, time-limited, informed by monitoring)</p>		
<p><b>Process &amp; engagement-based mitigations</b></p>		
<p><b>1. Respite based mitigations</b></p>	<p>In addition to any generally agreed construction controls and working hour restrictions secured through the Development Consent Order, the Applicant should commit to an adaptive, respite-based approach to construction practices where monitoring or engagement activity indicates emerging or disproportionate mental health and wellbeing impacts on specific communities.</p> <p>This would be discussed at the appropriate Scheme Specific Governance Board for decision making.</p> <p>This approach recognises that mental health and wellbeing impacts arising from NSIPs are not experienced uniformly, and that certain communities, places or groups may experience heightened cumulative stress, fatigue or sleep disturbance at particular stages of the project lifecycle, depending on local context, duration and intensity of activity, and the presence of vulnerable receptors. Particular regard should be given to communities experiencing cumulative exposure to multiple NSIPs, where the additive effects of disturbance and uncertainty may exacerbate mental health and wellbeing impacts beyond those anticipated for the Project in isolation.</p> <p>This may include, where practicable:</p> <ul style="list-style-type: none"> <li>- refinement of working hours beyond standard controls for defined periods;</li> <li>- adjustments to sequencing or phasing of works to reduce prolonged or repeated disturbance;</li> <li>- enhanced communications and/or advance notice of particularly disruptive activities;</li> </ul>	<p><b>N/A</b></p> <p><b>Decided by Scheme Specific Governance Board and implemented by the Applicant.</b></p>
<p><b>2. Access to Healthcare</b></p>	<p>Where monitoring or engagement indicates that construction activity, traffic management, diversions or extended working hours are affecting the ability of residents to access healthcare services, the Applicant is expected to implement proportionate mitigation focused on maintaining access.</p> <p>Mitigation may include, where relevant to the affected parishes:</p> <ul style="list-style-type: none"> <li>• temporary access arrangements or alternative access routes;</li> <li>• transport or navigation support (for example, shuttle services (including investment into autonomous shuttle services), community transport or supported travel during periods of disruption);</li> </ul>	<p><b>Up to £10K per parish p.a.</b></p> <p><b>i.e. up to £60k p.a. for 6 parishes</b></p>

	<ul style="list-style-type: none"> <li>• coordination with healthcare providers to plan around disruptive phases and support clear communication to patients.</li> </ul> <p>The level of mitigation required would be determined through the Scheme Specific Governance Board</p>	
<b>Community capacity &amp; resilience mitigations</b>		
<b>3. Parish/Town Council Support</b>	<p>Provide a Parish/Town Council Support Fund recognising additional workload and wellbeing burden created by prolonged NSIP processes.</p> <p>Fund could cover (as a minimum):</p> <ol style="list-style-type: none"> <li>1. Parish Clerks backfill/extra hours during consultation peaks;</li> <li>2. Wellbeing awareness, training and relevant support for Parish Clerks and Councillors</li> <li>3. Training on Development Consent Order (DCO) process, evidence submission and community facilitation;</li> <li>4. Reasonable expenses for meetings/site visits;</li> <li>5. Access to independent planning/technical advice on a case-by-case basis;</li> <li>6. Communications support (e.g. templates, printing, postage) to reach residents without digital access.</li> </ol>	<p><b>Up to £10K per affected parish p.a.</b> (scaled to number of parishes + consultation intensity)</p> <p><b>Total up to £60K for 6 parishes</b></p>
<b>Wellbeing and resilience support</b>		
<b>4. Universal and targeted wellbeing support</b>	<p><b>Wellbeing support</b></p> <p>Provide wellbeing support to acknowledge and mitigate stress arising from uncertainty and cumulative NSIP pressures.</p> <p><b>Universal offer</b> (examples):</p> <ul style="list-style-type: none"> <li>- Distribute printed Suffolk County Council developed 'Well Minds'<sup>6</sup> resources to impacted households</li> <li>- Clear signposting to Well Minds resource and local VCFSE organisations in all promoter communications.</li> </ul> <p><b>Targeted offer</b> - as needed (examples):</p> <ul style="list-style-type: none"> <li>- Development of local peer support networks and/or community connectors who can provide informal emotional support and signposting to residents and community groups</li> <li>- Ensure engagement events include quiet space, trauma-informed facilitation, and clear routes for community members to raise concerns confidentially. Additional specific listening events/drop-in sessions (physical or virtual) where residents can talk confidentially with trained connectors.</li> </ul>	<p><b>Up to £10K per parish p.a.</b></p> <p><b>i.e. up to £60k p.a. for 6 parishes</b></p>

<sup>6</sup> <https://www.healthysuffolk.org.uk/asset-library/Well-Minds-Booklet-Version-2-December-25.pdf>

	<ul style="list-style-type: none"> <li>- Expanded signposting – to include specialist helplines and support for trauma, bereavement &amp; financial stress</li> <li>- Wellbeing activities delivered by VCFSE partners e.g. group-based support, stress &amp; resilience workshops</li> </ul>	
<b>Place-based community initiatives</b>		
<b>5. Flexible community initiatives</b>	<p>Where monitoring and engagement activity indicates emerging or sustained impacts on community wellbeing, the Applicant should make provision for a <b>modest, flexible approach to community wellbeing initiatives</b>, informed by evidence and local need.</p> <p>This provision is intended to support community wellbeing where prolonged construction activity or cumulative NSIP pressures contribute to social isolation, loss of community cohesion, or a need for reconnection during or following periods of intensive works.</p> <p>A <b>modest, flexible fund</b>, to be used on a proportionate, time-limited basis that could support e.g.</p> <ul style="list-style-type: none"> <li>- physical activity (e.g. group exercise)</li> <li>- social connection (e.g. community gardening)</li> <li>- community cohesion (e.g. local social hubs)</li> <li>- other locally appropriate wellbeing-promoting activity (e.g. youth activities)</li> </ul> <p>Any initiatives should be <b>evidence-led, locally appropriate and non-prescriptive</b></p> <p>No pre-allocation to specific activities is expected in advance of monitoring outcomes</p> <p>Identification and coordination should be supported through the Community Relationship Manager, working with appropriate local VCFSE partners</p>	<p><b>Up to £10K per parish p.a.</b></p> <p><b>i.e. Up to £60K p.a. for 6 parishes</b></p>
<p><b>The measures set out above are not intended to be exhaustive or prescriptive. They reflect current evidence and anticipated risks to provide an indication of the types of measures which could be carried out to mitigate impacts on mental health but recognise that the lived experience of communities may evolve over time.</b></p> <p><b>The Applicant is therefore expected to adopt an adaptive management approach, using monitoring and engagement findings to refine, supplement or adjust mitigation measures as necessary to respond to emerging or unforeseen impacts on community wellbeing.</b></p> <p><b>This provision ensures that this commitment remains responsive and proportionate to real-world impacts, rather than limited to a fixed set of assumptions made in advance.</b></p>		

**Annex A – Evidence Review**

# **[PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433**

## **Evidence search report**

**Completed: 26th March, 2026**

If you would like to discuss the findings below or require an additional search, please contact: NELFT Library and Knowledge Service at [library@nelft.nhs.uk](mailto:library@nelft.nhs.uk)

Please acknowledge this work in any resulting paper or presentation as:

Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

## **Summary of results**

A selection of institutional publications has been included that either provide a broad overview or outline specific projects, for example the impact of HS2 on mental health and wellbeing. The report from Suffolk County Council, "Community Engagement and Wellbeing", may also be of interest.

In addition to this, the research articles included explore loneliness in the built environment, social inclusion considerations for urban planning, as well as large-scale projects such as water infrastructure in New Zealand, airport developments, and HS2 in the UK. Of particular interest may be "Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing" by Morley et al. A final section has also been added featuring articles that look more broadly at community engagement in infrastructure projects.

Also see previous

search [https://www.knowledgeshare.nhs.uk/index.php?PageID=literature\\_search\\_request\\_assigned&RequestID=49390](https://www.knowledgeshare.nhs.uk/index.php?PageID=literature_search_request_assigned&RequestID=49390)

## **Contents**

### **A. Search terms and notes**

### **B. How to access full text**

### **C. Search results**

#### **i. Systematic Review**

1. [The impact of the built environment on loneliness: A systematic review and narrative synthesis.](#)

#### **ii. Institutional Publication**

Please acknowledge this work in any resulting paper or presentation as:

Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

1. EIS Council, [The psychological impact of infrastructure failures on communities](#)
2. A Chartered Institute of Building (CIOB), [Understanding Mental Health in the Built Environment 2025](#)
3. Suffolk County Council, [Energy projects and the wellbeing of communities](#)
4. HS2, [HS2 Mental Health and Wellbeing Progress Report](#)
5. Rand Europe, [Understanding the mental health and wellbeing effects of the HS2 rail line development](#)

### iii. Original Research

1. [A Spatial Analysis of Perceived Wellbeing During Large Urban Infrastructure Construction: The Case of the Flyover in Thessaloniki, Greece](#)
2. [The role of residential urban form and built environment in supporting social interaction, health, and well-being: a focus on forming and maintaining ties.](#)
3. [Development of a Holistic Wellbeing Framework and Conceptual Model for Infrastructure Investment: A Comprehensive Approach to Performance Monitoring for Intergenerational Wellbeing Outcomes in New Zealand.](#)
4. [Understanding Perceived Impacts of Large-Scale Projects on Forest-Edge Populations.](#)
5. [THE IMPORTANCE OF Mental Health and Well-being: How the mental health of professionals and others is affected by involvement in the process of land taking in the UK.](#)
6. [Wellbeing Impact Study of High-Speed 2 \(WISH2\): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing.](#)
7. [The health impacts of transformative infrastructure change: Process matters as much as outcomes](#)

### iv. Community Engagement

1. [Evaluating the Quality-of-Life and Happiness Indices of Hydropower Project-Affected People in Pakistan: Towards a Sustainable Future.](#)
2. [Investigating public disengagement from planning for major infrastructure projects : a high voltage powerline case study](#)
3. [Public participation in decision-making on wind energy infrastructure : rethinking the legal approach beyond public acceptance](#)
4. [Do local economic interests matter when regulating nationally significant infrastructure? The case of renewable energy infrastructure projects.](#)
5. [Local voices on renewable energy projects: the performative role of the regulatory process for major offshore infrastructure in England and Wales.](#)

## D. Search strategy

## E. Disclaimer

### A. Search terms and notes

Google and Knowledge and Library Hub search terms;

"Nationally Significant Infrastructure Projects" OR NSIP OR major infrastructure projects AND mental health OR wellbeing well-being

"Nationally Significant Infrastructure Projects" OR NSIP AND "Community engagement" AND wellbeing OR well-being OR "Mental Health"

Please acknowledge this work in any resulting paper or presentation as:

Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

Google Scholar cited reference search using "Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing"

### Sources searched (number of results in brackets):

Academic Search Index (1)  
British Library EThOS (2)  
Complementary Index (6)  
Google (7)  
Medline (2)

For full search strategy see Section D below.

Please acknowledge this work in any resulting paper or presentation as:  
Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

## B. How to access full content

Links are given to full text resources where available. For some of the papers, you will need an **NHS OpenAthens Account**. If you do not have an account you can [register online](#).

You can then access the papers by simply entering your username and password. If you do not have easy access to the internet to gain access, please let us know and we can download the papers for you.

## C. Search results

### i. Systematic Review

#### 1. The impact of the built environment on loneliness: A systematic review and narrative synthesis.

Bower Marlee Kent Jennifer Patulny Roger Green Olivia McGrath Laura Teesson Lily Jama lishahni Tara Sandison Hannah Rugel Emily. 2023;79 102962.

[Check for full-text availability](#)

[More details](#)

Loneliness is a pressing public health issue. Although quintessentially individual, it is shaped by wider environmental, cultural, socio-economic, and political circumstances. Using a systematic review methodology, this paper draws on interdisciplinary research to conceptualise the relationship between the built environment and loneliness. We present a narrative synthesis of 57 relevant studies to characterise the body of evidence and highlight

Please acknowledge this work in any resulting paper or presentation as:  
Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

specific built-environment elements. Our findings demonstrate the need for further conceptual and empirical explorations of the multifaceted ways in which built environments can prevent loneliness, supporting calls for investment into this public-health approach. Copyright © 2023 Elsevier Ltd. All rights reserved.

## ii. Institutional Publication

### 1. The psychological impact of infrastructure failures on communities

EIS Council, 2026

[More details](#)

### 2. Understanding Mental Health in the Built Environment 2025

A Chartered Institute of Building (CIOB), 2025

[More details](#)

### 3. Energy projects and the wellbeing of communities

Suffolk County Council, 2024

The new document - Community Engagement and Wellbeing Supplementary Guidance - complements the council's Energy and Climate Adaptive Infrastructure Policy, and is aimed at project promoters, parish councils and local communities.

Research by Suffolk Mind, and the experiences of the county council, show that the wellbeing of local residents and communities suffers when NSIPs are proposed in a local area, especially when multiple projects are on the table.

Feelings of fear, mistrust, anger, and frustration are all reported, along with impacted sleep, and inability to plan for the future, due to the uncertainty created by the proposed development.

[More details](#)

### 4. HS2 Mental Health and Wellbeing Progress Report

HS2, 2022

[More details](#)

### 5. Understanding the mental health and wellbeing effects of the HS2 rail line development

Rand Europe, 2021

[More details](#)

## iii. Original Research

### 1. A Spatial Analysis of Perceived Wellbeing During Large Urban Infrastructure Construction: The Case of the Flyover in Thessaloniki, Greece

Kyriakou Kalliopi Maragkotiidou Athina Polychroni Aphrodite Lakakis Konstantinos. *Sustainability* 2026;18(5): 2599.

[Check for full-text availability](#)

Please acknowledge this work in any resulting paper or presentation as:  
Evidence search: [PH Bulletin] Mental health or wellbeing impacts of Nationally Significant Infrastructure Projects (NSIPs) SN65433. Marie Hounsome. 26th March, 2026. Ilford, UK: NELFT Library and Knowledge Service.

Large-scale urban infrastructure projects are essential, yet they often introduce prolonged disruptions that affect residents' perceived wellbeing. Existing research has demonstrated temporary declines in wellbeing during construction periods, but often relies on aggregate indicators, longitudinal averages, aggregate indicators, or proximity-based measures, providing limited insight into neighbourhood-level spatial inequalities and local clustering. This study addresses this gap by developing a Perceived Wellbeing Indicator (PWI) and applying a place-based, spatially explicit framework to examine patterns of perceived wellbeing associated with the Thessaloniki Flyover project. A questionnaire survey captured residents' experiences of stress, accessibility, and perceived air and noise pollution. Indicator weights were derived using a hybrid approach combining Principal Component Analysis and the Analytic Hierarchy Process. Exploratory Spatial Data Analysis techniques were applied to identify clusters, spatial outliers, and neighbourhood typologies of perceived wellbeing, which were further interpreted with child dependency ratios and perceived air pollution and noise annoyance. Results reveal pronounced spatial heterogeneity in perceived wellbeing. Low-wellbeing clusters are concentrated in Evosmos, Sykies, and Ano Toumpa, while higher wellbeing is observed in Efkarpia, Kato Toumpa, and Thermi. Lower PWI values are more frequent near the Flyover axis, indicating a spatial concentration of lower values in its vicinity, although similar patterns also appear in districts distant from the project. Overall, the findings demonstrate that perceived wellbeing is shaped by a combination of local environmental, socioeconomic, and neighbourhood conditions, including pre-existing spatial inequalities, rather than infrastructure proximity alone. By providing a spatially explicit understanding of wellbeing, this framework supports sustainable urban planning, enabling interventions that reduce environmental stress, promote social equity, and enhance community resilience during and after large-scale infrastructure development.

## **2. The role of residential urban form and built environment in supporting social interaction, health, and well-being: a focus on forming and maintaining ties.**

Ishikawa Taiyo Kytta Marketta Rinne Tiina. 2026;25(1): 14.

[Check for full-text availability](#)

[More details](#)

**BACKGROUND:** Social interaction is essential for health and well-being, given the growing public health concern of social isolation and loneliness. The role of the built environment in supporting social interaction has been widely studied. However, previous research has often treated social interaction as a single, undifferentiated category, although different types of interaction may serve distinct social functions and be influenced by different environmental factors. Moreover, most studies have focused primarily on residential neighborhood contexts. This study addresses these key gaps by distinguishing between two types of social interaction-tie formation and tie maintenance-and by examining built environment characteristics across broader, individualized multidimensional activity space models. **METHOD:** Using data from a Public Participatory GIS (PPGIS) survey (n = 386) in Turku, Finland, this study analyzed how residential urban form and built environment features relate to tie formation and tie maintenance. Built environment features were assessed using three activity space models: 500-meter home buffer, combined buffer around home and daily destinations, and individualized activity range spanning between home and destinations. Structural Equation Modeling was used to examine how these factors influence each type of social interaction and associated psychosocial outcomes. **RESULTS:** Residing in urban areas was significantly associated with tie maintenance but not with tie formation. Walkability around the home supported both types of interaction, whereas parks and green spaces near daily destinations were positively associated with tie

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formation. A similar pattern was observed within individualized activity ranges, where park ratio predicted tie formation. These two types of social interaction influenced psychosocial outcomes through distinct pathways: tie formation had direct positive effects on health and well-being, while tie maintenance contributed indirectly through increased relationship satisfaction. CONCLUSION: The findings emphasize the importance of distinguishing between different types of social interaction and accounting for their unique spatial and functional drivers. Urban planning and public health efforts should consider how different aspects of the built environment foster both the formation and maintenance of social ties. Promoting environments that support diverse forms of social interaction is essential not only for enhancing health and well-being but also for reducing the risk of loneliness. Copyright © 2026. The Author(s).

### **3. Development of a Holistic Wellbeing Framework and Conceptual Model for Infrastructure Investment: A Comprehensive Approach to Performance Monitoring for Intergenerational Wellbeing Outcomes in New Zealand.**

Barnes Erik Pancholy Purvi Henning Theunis F. P. Mankelow Cody Bellamy Larry. *Journal of Infrastructure Systems* 2025;31(2): 1-17.

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Investment decisions and our infrastructure's performance are under increasing pressure to provide transformative solutions to address social injustice, environmental impacts, and poverty and improve intergenerational wellbeing. This paper discusses a meso-level infrastructure wellbeing performance framework and conceptual model that has been developed for the New Zealand context, including New Zealand indigenous knowledge (Mātauranga Māori), and tests the viability using three waters (drinking water, sewage, stormwater) data derived from New Zealand sources. An infrastructure investment and a performance monitoring framework that embeds wellbeing analysis will help decision makers better understand the performance of their infrastructure in delivering on a community's wellbeing. Current performance and decision-making frameworks and assessment tools like multicriteria analysis and cost-benefit decision-making models, rely heavily on economic analysis and technical asset variables. Decision-making frameworks that use sustainable and wellbeing variables tend to be limited in scope and primarily focus on macro policy decision making and micro infrastructure asset-level performance outcomes. A meso (local/regional) level framework that considers wellbeing is required to better understand the performance of infrastructure on intergenerational wellbeing. The development of this novel framework and conceptual model considers the New Zealand Treasury Living Standards Framework 2021 (NZ LSF), which has significant influence from He Ara Waiora (a framework considering mātauranga Māori principles of wellbeing) and the United Nations Sustainable Development Goals (UN SDG). The novel wellbeing framework and conceptual model provide a comprehensive performance monitoring tool for three waters infrastructure at a meso (local/regional) level. The framework and model will help decision makers make holistic decisions for their infrastructure investment, looking at intergenerational wellbeing. Practical Applications: When it comes to deciding where to invest in infrastructure, there are a lot of factors to consider. We want to ensure that our decisions do not harm the environment or make life harder for future generations. Most of the time, people look at technical details and cost. To address this problem, our research in New Zealand came up with a new way to make decisions about infrastructure and consider how they are performing regarding delivering social, cultural, environmental, and economic outcomes. A tool was created that looks at different aspects that would make our lives better now and in future generations, like how well people are doing, how indigenous

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knowledge can help, and what the United Nations and government think is important. This way, decision makers can make choices that are good for everyone and better understand the impact the decision may have on our wellbeing.

#### **4. Understanding Perceived Impacts of Large-Scale Projects on Forest-Edge Populations.**

Şahin Gizem Yurdakul Erol Seçil Yorulmaz Özlem. *Forests (19994907)* 2025;16(6): 879.  
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Forests are increasingly under pressure due to rapid population growth, unplanned urbanization, and the conversion of forest land for non-forestry uses. In Istanbul, large-scale infrastructure projects—including a major airport, motorways, and a bridge—constructed in forested northern regions have led to significant land use change, generating complex social and environmental impacts. This study examines how local populations perceive the social consequences of these projects. Data were collected through 995 questionnaires across 25 neighborhoods and semi-structured interviews with 18 neighborhood headmen and 5 representatives from NGOs and professional organizations. Exploratory factor analysis was used to categorize perceptions, and Mann–Whitney U tests assessed differences based on proximity to project sites and project type. The findings indicate that both proximity and project type play a key role: residents living closer to the projects—and particularly those living near the airport—report more negative impacts, including feelings of insecurity, increased accident risk, limited employment opportunities, loss of forest, agricultural, and pasture lands, heightened environmental, noise, and air pollution, as well as adverse effects on physical and mental health. Measuring and mitigating these impacts during and after the projects is essential. Properly conducted, audited, and effective social impact assessments are of vital importance for the local people living around the project.

#### **5. THE IMPORTANCE OF Mental Health and Well-being: How the mental health of professionals and others is affected by involvement in the process of land taking in the UK.**

LEWIS MEYRIC. *Right of Way* 2024;71(6): 44-47.

[More details](#)

Meyric spoke on the issues arising at the 70th Annual International Education Conference in Long Beach in June earlier this year. This article is based on research that was presented by CPA Chair David Holland at CPA's annual conference in July 2022.

#### **6. Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing.**

Morley Katherine I. Hocking Lucy Saunders Catherine L. Bousfield Jennifer W. Bostock Jennifer Brimicombe James Burgoine Thomas Dawney Jessica Hofman Joann a Lee Daniel Mackett Roger Phillips William Sussex Jon Morris Stephen. *PLoS ONE* 2024;19(2): 1-23.

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Although research has demonstrated that transport infrastructure development can have positive and negative health-related impacts, most of this research has not considered mental health and wellbeing separately from physical health. There is also limited understanding of whether and how any effects might be experienced differently across population groups, whether this differs according to the stage of development (e.g. planning, construction), and how changes to planned infrastructure may affect mental health and wellbeing. This paper presents a protocol for the Wellbeing Impact Study of HS2 (WISH2), which seeks to address these questions using a high-speed rail development in the UK as an applied example. WISH2 is a 10-year, integrated, longitudinal, mixed-methods project using general practices (primary medical care providers in the UK) as an avenue for participant recruitment and for providing a geographically defined population for which aggregated data on mental health indicators are available. The research comprises: (i) a combined longitudinal and repeated cross-sectional cohort study involving multiple waves of survey data collection and data from medical records; (ii) longitudinal, semi-structured interviews and focus groups with residents and community stakeholders from exposed areas; (iii) analysis of administrative data aggregated at the general practice population level; and (iv) health economic analysis of mental health and wellbeing impacts. The study findings will support the development of strategies to reduce negative impacts and/or enhance positive mental health and wellbeing impacts of high-speed rail developments and other large-scale infrastructure projects.

## 7. The health impacts of transformative infrastructure change: Process matters as much as outcomes

Haigh Fiona Fletcher-Lartey Stephanie Jaques Karla Millen Elizabeth Calalang Cesar de Leeuw Evelyne Mahimbo Abela Hirono Katie. *Environmental Impact Assessment Review* 2020;85 106437.

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### Background

Major infrastructure development is often transformative for society, including its health. In this realm, there is a growing trend to view airports as drivers for health. By linking airport, urban and health planning, airports can become settings for health. Engaging stakeholders and those affected by such major change in health assessments is essential. This paper demonstrates that health and health equity impacts of major infrastructure developments such as airports extend to the planning processes for these developments; it argues that building a Healthy Airport requires greater consideration of how communities are engaged in these processes.

### Methods

We carried out a Health Impact Assessment of community engagement practices for the planning processes of a new greenfield airport in Australia. The standard step-wise process for completing an HIA was followed.

### Results

151 stakeholders participated in the study. Overall, participants were dissatisfied with community engagement for the proposed airport. While there were some unanticipated positive community level impacts resulting from the engagement process (community members becoming involved in community activism), by and large community members identified mostly negative impacts including anxiety, disempowerment, poor social connection, lack of trust and aggravation of health inequities.

### Conclusion

Potentially affected individuals and communities may feel disenfranchised by transformative infrastructure change 'over their heads'. Missed opportunities to achieve benefits of well-

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executed community engagement not only lead to feelings of disempowerment and frustration among stakeholders but can potentially negatively impact on individual and community health and well-being. Health impact assessments that effectively assess planning and engagement processes can play a role in mitigating these impacts.

#### iv. Community Engagement

##### 1. Evaluating the Quality-of-Life and Happiness Indices of Hydropower Project-Affected People in Pakistan: Towards a Sustainable Future.

Qayum Maria Li Weisong Sohail Muhammad Tayyab. *Water* (20734441) 2024;16(22): 3225.

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Worldwide, the development of massive hydropower projects is becoming more common, especially when it comes to attempts to mitigate environmental degradation and increase a nation's energy capacity. People affected by projects (PAPs) are forced to relocate in order to support large-scale development initiatives, which puts their lives and livelihoods at jeopardy. In comparison to the value of infrastructure development, which is mostly reaped by distant stakeholders, it comes at a high cost. In relation to CSR/resettlement and rehabilitation programs carried out by construction corporations in Pakistan's hydropower development, this study on the quality-of-life (QoL) and happiness indicators of PAPs is being conducted. The analysis of factors affecting happiness and other aspects of quality-of-life indicators, including job and livelihood opportunities, housing, health, infrastructure, social interactions, environmental sustainability, inclusion, equity, and diversity, is the goal of this study. Using a questionnaire survey approach, data were directly gathered from PAPs, and about 424 replies were obtained to help with the model's development. Structural equation modelling has been applied in conjunction with multivariate statistical analysis to analyse data. The outcome demonstrates the essential connections between the concepts that were taught in light of human, social, environmental, physical, and economic problems. The results also show that project supporters' relocation and rehabilitation efforts fell short of what was needed to improve the quality of people's lives. As a result, a conceptual framework specifically tailored to the hydropower construction region has been created and verified to provide PAPs with a high-quality living environment.

##### 2. Investigating public disengagement from planning for major infrastructure projects : a high voltage powerline case study

Queen C. 2022;

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Public disengagement from consultation is a real-world problem affecting areas of the public sphere, such as land use planning, where democracy is a key requirement. The ethos of engaging the public in decision-making has long been accepted as an important objective in the UK planning system in order to protect and serve the public interest. However, there is limited research into why the public frequently appear to disengage from the consultation process for major engineering projects such as energy infrastructure. Public disengagement can result in a lack of representation and legitimate speech in the discourse of decision-making and my research challenges the effectiveness of the current system. Drawing on human geography, planning theory, sociology and my professional

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experience of working as an Environmental Planner on Nationally Significant Infrastructure Projects, the research moves away from the current perceptions of an instrumental approach to public consultation for infrastructure. A novel approach to conceptualising disengagement is proposed through a Bourdieusian lens, which could enable a deeper understanding of the reasons for both voluntary and involuntary disengagement. By introducing a place dimension to the conceptual framework, the research is better able to understand the cognitive, affective and behavioural dimensions that reflect the ways in which communities of place choose to engage with, or disengage from, the public consultation process for infrastructure. The research contributes conceptually, methodologically and empirically to addressing the research problem through a high voltage overhead powerline case study research design in Cumbria. Primary data has been collected through semi-structured interviews, participant observation and event ethnography. Secondary data, including local media, project documents, planning policy and best practice guidance, was also collected for contextual purposes. Qualitative methods allowed greater flexibility without a dependence on language, literacy or assumptions based on cultural norms and thematic analysis was selected as the method of analysis due to its accessibility and theoretically flexible approach to analysis which could be used with a case study research design. The credibility of the analysis was established through data collection triangulation using the secondary data to verify the emerging themes. The primary contribution to knowledge from this research has been to expand the understanding of disengagement, using the novel conceptual approach that combines the Bourdieusian conceptual framework with aspects of place, and which also has policy and practice implications. Factors affecting engagement in the case study include an underlying thread of symbolic violence and perceptions of stigma which have been shown to be partly place-based and partly resulting from community experiences of legacy planning applications for energy. There are also underlying factors of marginalisation and peripherality, with small communities frequently perceived to be without power or voice in the process. An examination of the relationship between habitus and place has suggested that disengagement can be explained by both communities of practice and of place and an analysis of the public's relationship with place through the varieties of people-place relations can bring additional insight to understanding the problem. The empirical output of the research includes a Typology of Engagement which disrupts the existing binary approach to engagement and disengagement. The typology incorporates degrees of engagement and, more significantly, degrees of disengagement which, once identified, can be used to inform public engagement strategies, taking into account the wider characteristics of locally affected publics. The findings of the case study offer a new understanding of aspects of disengagement and the findings support the argument that the conceptual approach of a Bourdieusian toolkit combined with a place dimension, can help to better understand the factors leading to disengagement. This opens up new opportunities for research in areas beyond planning, such as climate change, where public engagement could be key to the implementation of future adaptation strategies.

### **3. Public participation in decision-making on wind energy infrastructure : rethinking the legal approach beyond public acceptance**

Armeni Chiara. 2020;

[More details](#)

The right of the public to participate in decisions affecting their environment is institutionalised in environmental and planning law. But its meaning and rationales are interpreted in different ways, affecting the influence of participation in practice. A growing body of social science, environmental law and planning scholarship engages with the complexities and ambiguities of participation in wind energy infrastructure, including its

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relationship with the multiple factors shaping people's attitude towards them. This thesis argues that the policy and regulatory framework in this field remains anchored to a view of participation as an instrument to reduce objections and achieve public acceptance of decisions already made elsewhere, with little ability to influence the outcome. This thesis is concerned with the gap between a model of public engagement aimed to achieve public acceptance of pre-determined decisions ("acceptance model") and a model of participation aimed at constructing a deeper dialogue between decision-makers and the local community about options, values and expectations ("participatory model"). In so doing, it explores the scope for public participation in decision-making and benefit-sharing related to major offshore wind energy projects in England. It analyses participation in the authorisation process for two offshore wind energy Nationally Significant Infrastructure Projects (NSIPs) - the Rampion Offshore Wind Farm Project and the Navitus Bay Wind Park - , which were selected due to the high number of Interested Parties' representations made during their examination. This thesis then looks at the extent to which local communities can participate in decisions on the design and management of developer-led community benefit schemes from these projects. The thesis argues that, in the light of the increasing pressure towards deployment of low-carbon energy infrastructure, the space for substantive participation in decisions for large-scale offshore wind farms in England tends to be limited by overarching policy objectives and expert knowledge. The ways in which the regulatory process understands and institutionalises the meaning and functions of participation requires a more careful consideration. Community benefits schemes from wind energy infrastructure can create additional spaces for participation of local communities, outside the planning process. However, without a stronger effort towards their institutionalisation in law, the "participatory potential" of community benefits is likely to remain undeveloped.

#### **4. Do local economic interests matter when regulating nationally significant infrastructure? The case of renewable energy infrastructure projects.**

Rydin Yvonne Natarajan Lucy Lee Maria Lock Simon. *Local Economy* 2018;33(3): 269-286.  
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[More details](#)

Government policy in the UK, as in many countries, sees investment in infrastructure projects – particularly large ones – as a key means of supporting the national economy. But where does this leave local economic interests in the loci of these projects? And how does the regulation of such projects handle these interests? These are the questions addressed by this paper in the context of renewable energy projects that are regulated by the Nationally Significant Infrastructure Projects regime. Drawing on original research into the regulation of 12 projects – and using thematic analysis of key documents and focus groups with local participants – the analysis highlights the limited understanding of the local economy presented, the challenges that local businesses face in participating and the partial protection offered to them. It concludes by proposing agendas for reforms and future research.

#### **5. Local voices on renewable energy projects: the performative role of the regulatory process for major offshore infrastructure in England and Wales.**

Rydin Yvonne Natarajan Lucy Lee Maria Lock Simon. *Local Environment* 2018;23(5): 565-581.

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There is currently a considerable emphasis on delivering major renewable energy infrastructure projects. Such projects will have impacts on local communities; some impacts may be perceived as positive but others will be viewed more negatively. Any just regulatory process for considering and permitting such infrastructure will need to heed the concerns that local communities voice. But what counts as a local voice? In this paper it is argued that the regulatory process plays a performative role, constructing what counts as a local voice. Furthermore, this has consequences for how regulatory deliberations proceed and the outcomes of regulatory processes. The empirical basis for this argument is a study of major offshore renewable energy infrastructure in England and Wales and the way that it is regulated through a specific regime - the Nationally Significant Infrastructure Projects (NSIPs) regime established by the Planning Act 2008. Through a detailed study of eight projects that have passed through the regime, the analysis unfolds the way that the voices of local residents, local businesses, local NGOs and local authorities are constructed in the key boundary object of the Examining Authority's report; it then draws out the implications for the mitigation measures that are negotiated. The research suggests that what counts as a local voice is constrained by how the performative role of the NSIPs regulatory regime differentiates between interests and suggests that new ways of giving voice to local people are required.

## D. Search strategy

Ovid MEDLINE(R) ALL <1946 to March 24, 2026>

1 exp Mental Health/ 77664

2 exp Anxiety/ 134615

3 exp Mental Disorders/ 1596353

4 Psychological Well-Being/ 1021

5 Stress, Psychological/ 148333

6 Psychosocial Functioning/ 626

7 ((community adj2 wellbeing) or mental health or wellbeing or well-being or "well being").tw.  
450851

8 1 or 2 or 3 or 4 or 5 or 6 or 7 2108048

9 "nationally significant infrastructure projects".mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy supplementary concept word] 1

10 development consent order.mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy supplementary concept word] 0

11 (((((community adj2 consultation\*) or community) adj2 engagement) or public) adj particip\*).mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy supplementary concept word] 1765  
12 8 and 11 118

13 (infrastructure adj2 develop\*).mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy

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supplementary concept word] 2555

14 12 and 13 0

15 8 and 13 174

16 large scale infrastructure development\*.mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy supplementary concept word] 5

17 (infrastructure development on mental health and wellbeing).mp. [mp=title, book title, abstract, original title, name of substance word, subject heading word, floating sub-heading word, keyword heading word, organism supplementary concept word, protocol supplementary concept word, rare disease supplementary concept word, unique identifier, synonyms, population supplementary concept word, anatomy supplementary concept word] 1

18 exp Built Environment/ 1917

19 8 and 12 and 18 3

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