

# SEA LINK

EN020026

## Response to Rule 17 Letter dated 21 April 2026

Suffolk County Council

## Table of Contents

<b>Glossary of Acronyms</b> .....	<b>2</b>
<b>Purpose of this Submission</b> .....	<b>2</b>
Response to Rule 17 Letter dated 21 April 2026 .....	3
Appendix A: Additional proposed wording for the DCO .....	35

## Glossary of Acronyms

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

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

## Purpose of this Submission

The document has been prepared by Suffolk County Council to provide a written response to the Rule 17 letter issued by the ExA on 21 April 2026

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

## Response to Rule 17 Letter dated 21 April 2026

Ref. No	Topic	Question	SCC Response
1.2	DCO	<p><b>1.2 Article 11</b></p> <p>The ExA understands that the applicant remains in ongoing dialogue with SCC and does not consider that any amendments are required to article 11 at this stage [REP6-109].</p> <p>Nonetheless, the ExA requests that the applicant comments on SCC’s suggested amendments to article 11 [REP6-237], should agreement not be secured before the examination closes.</p>	<p>SCC requested the Applicant’s view of SCC’s proposed changes to Article 11 [REP6-237] prior to Deadline 7. The Applicant was not able to respond prior to Deadline 7 and so agreement has not been reached. SCC maintains its view that the wording provided at Deadline 6 is necessary. This also applies to SCC’s proposed rewording of Articles 13 and 18 within [REP6-237].</p>
1.6	DCO	<p><b>1.6 Requirement 15 – Restriction on carrying out works when consented in another order</b></p> <p>SCC [REP6-237] provided amended wording to requirement 15 in response to ExQ3GEN27. In relation to the suggested wording, the ExA considers further amendments would be necessary for clarity and precision. The ExA therefore asks SCC to consider the following questions and to provide a response and revised drafting:</p> <ul style="list-style-type: none"> <li>Should the requirement specifically refer to the Scottish Power Renewables (UK) Limited (SPR)</li> </ul>	<p>In the latest version of the draft DCO [REP6-005], requirement 15 (restriction on carrying out works when consented in another order) states –</p> <p>“Where any part of Work No.1B has been completed pursuant to another development consent order, those works must not be constructed under this Order, save where amendments to those works are required for the purposes of the Authorised Project”.</p> <p>SCC has previously requested that this provision should be amended as follows –</p> <p>“Where any part of Work No.1B has been <b>completed commenced</b> pursuant to another development consent order, <b>those works that Work</b> must not be constructed under this</p>

Ref. No	Topic	Question	SCC Response
		<p>projects rather than stating ‘pursuant to another development consent order’?</p> <ul style="list-style-type: none"> <li>• Should the requirement include a control mechanism or control points?</li> <li>• Should detail be added to clarify what the ‘alterations’ would comprise or be limited to?</li> <li>• Should this be an article rather than a requirement?</li> </ul> <p>In answering the above, the ExA also asks SCC to provide a working example to show how this requirement would be applied and discharged in practice.</p> <p>The ExA asks that the text suggested by SCC in <a href="#">[REP6-237]</a>, and any other amendments that SCC considers necessary in relation to the above questions, be discussed and agreed with ESC and the applicant before submission. If this is not possible, the ExA requests that any outstanding disagreements on drafting be fully explained by SCC, ESC and the applicant by DL7.</p>	<p>Order, save where <b>amendments alterations</b> to <b>those works that Work</b> are required for the purposes of the Authorised Project”.</p> <p>SCC notes the wide definition in Schedule 1 to the draft DCO <b>[REP6-005]</b> of “Work No.1B”. Owing to the fact SCC considers Requirement 15 should apply to the substation element of that work only, SCC has amended the drafting so that the references to “Work No.1B” are replaced with references to “the substation”. SCC’s amended definition (which also incorporates points raised by the ExA) is set out below.</p> <p><b>• <u>Should the requirement specifically refer to the Scottish Power Renewables (UK) Limited (SPR) projects rather than stating ‘pursuant to another development consent order’?</u></b></p> <p>SCC considers “pursuant to another development consent order”, which is the language proposed by the applicant, is clear and precise. An advantage of the current drafting is that it captures the (unlikely) event of an order, other than East Anglia ONE or East Anglia TWO, triggering the requirement.</p> <p>If the ExA considers greater precision is required, SCC would recommend referring to the official titles of the development consent orders, rather than to the name of the undertaker. In the usual way in a DCO, the SI reference for each order referred to should be included in a footnote. So, here, a new paragraph could be added to state –</p>

Ref. No	Topic	Question	SCC Response
			<p>“In this requirement, “another development consent order” means East Anglia ONE North Offshore Wind Farm Order 2022<sup>(a)</sup> or East Anglia TWO Offshore Wind Farm Order 2022<sup>(b)</sup>.</p> <p>(a) S.I. 2022/432</p> <p>(b) S.I. 2022/433”</p> <p>Below, SCC sets out two options for this requirement: one which particularises the meaning of “another development consent order” and another which does not.</p> <p><b><u>• Should the requirement include a control mechanism or control points?</u></b></p> <p>As drafted by the applicant, the requirement prevents the construction of Work No.1B where any part of it has been completed pursuant to another DCO. The proposed control mechanism is therefore the prohibition of the construction of Work No. 1B under the powers of the instant Order if that work has been completed pursuant to another DCO.</p> <p>As SCC has explained in previous submissions, SCC considers the control mechanism should be <u>the prohibition of the construction</u> of Work No. 1B under the instant Order where any part of it has been <u>commenced</u> pursuant to another DCO.</p> <p>On reflection, to assist with the smooth operation of the post-consent stage of the project, SCC considers a mechanism is required to inform the relevant planning authority of any</p>

Ref. No	Topic	Question	SCC Response
			<p>proposal to commence Work No.1B or to commence any alterations to that (completed) work. SCC would therefore propose a new paragraph which could state –</p> <p>“(X) The undertaker must give not less than 28 days’ notice to the relevant planning authority of the proposed commencement of either –</p> <p>(a) any part of Work No. 1B, where such commencement is proposed under this Order; or</p> <p>(b) any alteration to Work No. 1B, where that work has been constructed under another development consent order.</p> <p>(Y) Any notice given under paragraph (X)(a) must include a declaration that Work No.1B has not been commenced pursuant to another development consent order”.</p> <p><b><u>• Should detail be added to clarify what the ‘alterations’ would comprise or be limited to?</u></b></p> <p>SCC does not consider any more detail is necessary.</p> <p>“Alteration” would be given its ordinary (dictionary) meaning (as would “amendment”, if the applicant’s drafting were preferred). SCC notes that where “alter” is used elsewhere in the draft Order <b>[REP6-005]</b>, its meaning is not particularised to state what it comprises or what it should be limited to. (See, for example, article 14(2) (power to alter layout, etc. of streets) where the</p>

Ref. No	Topic	Question	SCC Response
			<p>undertaker is empowered to “<u>alter</u> the layout of any street” etc.) (article 14(2)).</p> <p><b>• Should this be an article rather than a requirement?</b></p> <p>Speaking generally, an article is concerned with the grant of powers, and a requirement is concerned with the control of development. Since proposed requirement 15 seeks to control the exercise Work No. 1B, SCC considers it is appropriate that this provision remains in Schedule 3.</p> <p>In the light of above, SCC would propose that requirement 15 is amended as follows –</p> <p><u>Option 1</u></p> <p>(1) “Where any part of <b><u>the substation comprised within</u></b> Work No.1B has been <b><u>completed commenced</u></b> pursuant to another development consent order, <b><u>those works that substation</u></b> must not be constructed under this Order, save where <b><u>amendments alterations</u></b> to <b><u>those works that substation</u></b> are required for the purposes of the Authorised Project”.</p> <p>(2) <b><u>The undertaker must give not less than 28 days’ notice to the relevant planning authority of the proposed commencement of either –</u></b></p> <p><b><u>(a) any part of the substation, where such commencement is proposed under this Order; or</u></b></p>

Ref. No	Topic	Question	SCC Response
			<p><b><u>(b) any alteration to the substation, where it has been constructed under another development consent order.</u></b></p> <p><b><u>(3) Any notice given under paragraph (2)(a) must include a declaration that the substation has not been commenced pursuant to another development consent order.</u></b></p> <p><b><u>Option 2</u></b></p> <p>If the ExA considers “another development consent order” needs to be particularised, SCC would suggest the following drafting –</p> <p>(1) “Where any part of <b><u>the substation comprised within Work No.1B</u></b> has been <b><u>completed commenced</u></b> pursuant to another development consent order, <b><u>those works that substation</u></b> must not be constructed under this Order, save where <b><u>amendments alterations</u></b> to <b><u>those works that substation</u></b> are required for the purposes of the Authorised Project”.</p> <p><b><u>(2) The undertaker must give not less than 28 days’ notice to the relevant planning authority of the proposed commencement of either –</u></b></p> <p><b><u>(a) any part of the substation, where such commencement is proposed under this Order; or</u></b></p>

Ref. No	Topic	Question	SCC Response
			<p><b><u>(b) any alteration to the substation, where it has been constructed under another development consent order.</u></b></p> <p><b><u>(3) Any notice given under paragraph (2)(a) must include a declaration that the substation has not been commenced pursuant to another development consent order.</u></b></p> <p><b><u>(4) In this requirement, “another development consent order” means East Anglia ONE North Offshore Wind Farm Order 2022<sup>(a)</sup> or East Anglia TWO Offshore Wind Farm Order 2022<sup>(b)</sup>.”</u></b></p> <p><b><u>(a) S.I. 2022/432.</u></b></p> <p><b><u>(b) S.I. 2022/433.</u></b></p> <p><b><u>• In answering the above, the ExA also asks SCC to provide a working example to show how this requirement would be applied and discharged in practice.</u></b></p> <p>This requirement would work as follows –</p> <ul style="list-style-type: none"> <li>• If the Friston substation is commenced under another DCO – for example, East Anglia ONE North Offshore Wind Farm Order 2022 or East Anglia TWO Offshore Wind Farm Order</li> </ul>

Ref. No	Topic	Question	SCC Response
			<p>2022 – the provisions of that DCO apply to that commencement. The substation must then not be constructed under the Sea Link DCO. It is inherently unlikely that, were construction of the substation to be commenced (which in reality would be works undertaken by the current Applicant), it would not be completed. It is also fanciful to imagine that if, for any reason, that were not to happen, that the benefit of the relevant DCO would not be able to be transferred to the Applicant, so as to allow its completion under whichever of the 2022 Orders was applicable.</p> <ul style="list-style-type: none"> <li>• If the Sea Link applicant subsequently decides it wishes to alter that substation for the purposes of the Sea Link project, it must give East Suffolk Council not less than 28 days' notice of any alteration.</li> <li>• If, however, the Sea Link applicant proposes to commence the Friston substation under the Sea Link DCO, it must give East Suffolk Council not less than 28 days' notice of commencement. A notice in these circumstances must include a declaration that the substation has not been commenced pursuant to another DCO (such as East Anglia ONE North Offshore Wind Farm Order 2022 or East Anglia TWO Offshore Wind Farm Order 2022).</li> </ul>

Ref. No	Topic	Question	SCC Response
1.7	DCO	<p><b>1.7 Suggested new requirement – new substation at Grove Wood, Friston</b></p> <p>Should the ExA not be minded to include the new requirement proposed by SCC (point 20 [REP6-237]) for the proposed substation at Grove Wood, Friston, can SCC and all local authorities provide further drafting, with reasons, to allay any outstanding concerns with regards to the existing requirements for the substation.</p>	<p>SCC’s rationale for this requirement was based on the need for the substation to be constructed with the same mitigations as was secured under the SPR consent for the substation. The key mitigations of concern to SCC include drainage, landscape planting, design and working hours.</p> <p>SCC considers that the issue of drainage is resolved within the outline Drainage Management Plan.</p> <p>For landscape planting, SCC has set out in its summary statement of unresolved matters that Figure 5 of the outline LEMP is inadequate and does not reflect certain key mitigation planting secured under the SPR consents. This figure should be updated as per SCC’s suggestions to better mirror the belts of woodland along the track leading west from Grove Road to the north-west of the site.</p> <p>For working hours, SCC considers the drafting of Requirement 7 provided at Deadline 6 [REP6-237] would resolve that issue.</p> <p>For design, SCC is supportive of the ExA’s proposed change to Requirement 3(2). For further detail, please see row 9 (requirement 3(2) (Suffolk Substation (Friston)) of SCC’s response to the ExA’s Deadline 6 document <i>Schedule of ExA’s recommended amendments to the applicant’s dDCO submitted at deadline 6</i> which has been submitted at Deadline 7.</p>

Ref. No	Topic	Question	SCC Response
			<p>It should be noted that there may be concerns from other IPs regarding other impact areas, such as noise, vibration and lighting, which SCC does not have the expertise to provide an informed view on. Therefore, SCC considers that the views of other IPs, particularly, ESC, should be sought to consider what changes are needed to make the Requirement referenced by the ExA in 1.7 unnecessary.</p>
1.9	DCO	<p><b>1.9 Schedule 4 Discharge of requirements</b></p> <p>The ExA requests that all local authorities provide preferred timescales for schedule 4 paragraph 2 (further information) with reasons. The ExA notes that the explanatory memorandum [REP6-006] states that schedule 4 is based on the Bramford to Twinstead Order. The ExA requests the applicant to explain why the timescales in paragraph 2 (further information) are different to Bramford to Twinstead which specifies 7 and 21 business days respectively.</p>	<p>SCC has seen the amendments to paragraphs 2 of Schedule 4 proposed by East Suffolk Council (“ESC”) at Deadline 7. SCC supports those amendments and considers they should be incorporated into the draft Order. If the Secretary of State decides not to include ESC’s drafting in the made Order, SCC would request that the following amendments are made –</p> <p>“2. —(1) Where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application.</p> <p>(2) If the relevant authority considers further information is necessary <del>and the Requirement does not specify that consultation with a Requirement consultee is required,</del> the relevant authority must, within <del>7</del> <b>20 business</b> days of receipt of the application, notify the undertaker in writing specifying the further information required.</p>

Ref. No	Topic	Question	SCC Response
			<p><del>(3) If the Requirement specifies that consultation with a Requirement consultee is required, the relevant authority must issue the consultation to the Requirement consultee within 5 days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the Requirement consultee within 5 days of receipt of such a request and in any event within 21 days of receipt of the application.</del></p> <p><del>(4)</del> <b>(3)</b> If the relevant authority does not give the notification mentioned in sub-paragraphs (2) <del>or (3)</del> it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker.</p> <p><del>(5)</del> <b>(4)</b> Where further information is requested under this paragraph in relation to part only of an application, that part is treated as separate from the remainder of the application for the purposes of calculating the time periods referred to in paragraph 1 and in this paragraph.</p> <p>In sub-paragraph (2), 20 business days has been included, and the time limit applies regardless of whether the requirement demands consultation. The same drafting is included in requirement 2(2) of the East Anglia ONE North Offshore Wind Farm Order 2022 (SI</p>

Ref. No	Topic	Question	SCC Response
			<p>2022/432) and requirement 2(2) of the East Anglia TWO Offshore Wind Farm Order 2022 (SI 2022/432).</p> <p>The applicant cites paragraph 2 (further information) of schedule 4 (discharge of requirements) to the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958) as precedent for its drafting (see paragraph 5.4.2 of the Explanatory Memorandum <b>[REP6-006]</b>), though the time limit in Bramford is more generous.</p> <p>It has been well-rehearsed throughout the examination that discharging under the Bramford time limits has proved challenging; a duplication of Bramford (let alone an abbreviation of it) would be unsatisfactory.</p> <p>SCC considers the time limits included in the East Anglia Orders are reasonable (they would not have been included in two made DCOs if the Secretary of State did not consider this to be the case) and their appropriateness is heightened by the fact that the two Orders are for Suffolk NSIPs.</p> <p>Based on the above, SCC considers the case for including its preferred drafting is more compelling than anything put forward by the applicant to date.</p>

Ref. No	Topic	Question	SCC Response
2.4	Land Rights	<p><b>2.4 Ian Rix</b></p> <p>The ExA thanks Ian and David Rix for their submissions [REP6-210] and [REP6-198]. The ExA understands that SPR has options over some of the land plots owned by Ian Rix.</p> <p>Nonetheless, the ExA needs to be clear in relation to all land the applicant considers is required for this application and therefore requests that the applicant provides detailed responses to all of the points raised in the submission of Ian and David Rix.</p> <p>In the response to CAH2 action point (AP) 8 [REP6-110] the applicant explains that Suffolk plots 1/93, 1/94, 1/99 and 1/100 are for a proposed hedgerow to the south of the B1119.</p> <p>The applicant notes that the hedgerow planting was developed as part of the iterative design and assessment process in conjunction with ESC and SCC during the pre- application phase. The ExA asks SCC and ESC to provide comments on the implications of the removal of Suffolk plots 1/93, 1/94, 1/99 and 1/100 from the book of reference and the proposed hedgerow to the south of the B1119 from the order limits, should the ExA be minded to do so.</p>	<p>SCC understands from Figure 1 of the outline LEMP [REP6-078] that these plots will be used for hedgerow trees. SCC considers that the removal of these plots would remove part of the layered planting for views to the north of the sight including from the B1119, Footpath 8, Bridleway 29 and possibly Footpath 10 where visual receptors would be more affected if the parcels in question were to be taken out. SCC notes the concerns set out in Ian Rix’s submissions and suggests that the implementation of hedgerow planting without trees may be a suitable approach to address those concerns whilst also providing some layered planting from the aforementioned visual receptors.</p>
5.3	Historic Landscape	<p><b>5.3 Historic Landscape</b></p> <p>SCC [REP6-276] has stated that it does not agree that the changes to the Suffolk historic</p>	<p>As stated in its answers to ExQ3 [REP6-276], SCC defers to HE for a more detailed position with regards to cultural heritage, including historic landscape.</p>

Ref. No	Topic	Question	SCC Response
		<p>landscape would result in a minor adverse, and therefore non-significant effect. The ExA asks SCC, what level of adverse harm would you consider likely to the historic landscape and would this be a significant level of harm?</p>	<p>SCC's comments did not refer to the Suffolk historic landscape, but to the more immediate landscape around Saxmundham. Without having carried out a full assessment, SCC considers that that the adverse landscape and visual effects, and therefore the harm, would be significant.</p> <p>With regards to the Converter Station site, the significance would arise from the scale and duration of the change in a landscape of relatively low value, where historic landscape features have largely been lost, but which still presents a rural character with relatively few detracting features.</p> <p>With regards to the Fromus crossing the significance arises from the higher identified sensitivity (as identified in the Settlement Sensitivity Assessment, Volume 2: Suffolk Coastal, July 2018), and the design which cut across from west to east within this north-south orientated landscape, thereby further eroding the legibility of historic elements within this landscape.</p>
6	<b>Water Environment</b>	<p><b>6. Water Environment</b></p> <p>At DL6, in responding to issue specific hearing (ISH) 3 AP4 [REP6-184], SCC considers that there could be an increase in flood risk due to temporary storage of materials in areas which could be at medium / high risk of flooding. It indicates that sustainability benefits could be in the form of general compensatory activities, or a targeted commitment for those who fall in this category. For instance, it suggested that a commitment to community benefit beyond that which</p>	<p>SCC engaged with the Applicant on this issue prior to Deadline 7. However, the Applicant indicated that it did not support the provision for the requirement requested by the ExA. However, SCC has drafted wording for a potential requirement which would ensure that benefits to persons affected by flood risk are delivered such that the application meets the exception test.</p> <p>SCC would propose the following requirement –</p>

Ref. No	Topic	Question	SCC Response
		<p>is already committed to by the applicant under its license with The Office of Gas and Electricity Markets (Ofgem), targeted at residents in proximity to the sites of the onshore infrastructure could satisfy 5.8.11 of Overarching National Policy Statement for Energy (EN-1).</p> <p>The ExA requests that the applicant work with SCC to draft a requirement or other mechanism to secure wider sustainability benefits to community that outweigh flood risk should the Secretary of State deem it necessary to meet the requirement of the exception test.</p> <p>In SCC ISH3 ‘Written post hearing submissions’ <a href="#">[REP6-182]</a> SCC express concern that it is not clear that the sequential test has been passed. They consider that it has not been demonstrated that the temporary storage of construction materials cannot be placed in areas of low surface water flood risk. The ExA ask that the applicant clearly explain why this is the case or provide a suitable commitment that such materials would be placed in areas of low surface water risk.</p> <p>SCC also indicates <a href="#">[REP6-182]</a> that the sequential test may not be passed due to the location of temporary access routes within Flood Zone 3 if flood resilience design measures are necessary. The ExA ask that the</p>	<p>(1) Where the temporary storage of materials in an area of medium risk or high risk of surface water flooding results in an increased risk of flooding for persons who live in either area (“relevant persons”), the undertaker must submit, for the approval of the relevant planning authority, a plan for the benefit of such persons.</p> <p>(2) The plan mentioned in paragraph (1) must make provision for –</p> <p>(a) funding to support property flood resilience and property level flood protection for relevant persons;</p> <p>(b) social, environmental or economics benefits for relevant persons which outweigh the increased risk of flooding;</p> <p>(c) a strategy for engagement with relevant persons and relevant local authorities to determine what benefits will be provided pursuant to sub-paragraph (b);</p> <p>(d) a scheme to compensate relevant persons –</p> <p>(i) where the measures mentioned in sub-paragraphs (a) and (b) do not outweigh an increased risk of flooding; and</p> <p>(ii) with uninsured property or belongings in the event of a flood event.</p> <p>(3) The compensation scheme mentioned in sub-paragraph (2)(d) must make provision for –</p> <p>(a) the basis on which compensation will be calculated and paid;</p>

Ref. No	Topic	Question	SCC Response
		<p>applicant clearly set out their reasoning in response to this matter and, in answering, seek to work together with SCC prior to the DL7 submissions to resolve all remaining issues?</p>	<p>(b) the process for making and determining any claim (including a timetable for determination);</p> <p>(c) arrangements for notifying relevant persons of the determination of their claim;</p> <p>(d) determining any complaints;</p> <p>(e) the funding of the scheme by the applicant;</p> <p>(f) the administration of the scheme by the applicant or an alternative party as agreed with the relevant planning authority.</p> <p>(4) The scheme must be operated as approved.</p> <p>(5) In sub-paragraph (2)(c), "relevant local authorities" means the relevant planning authority and relevant highway authority.</p>
7.1	Rights of Way	<p><b>7.1 Permissive paths</b></p> <p>Can the applicant assure the ExA that the proposed permissive paths would remain open to the public for the duration of the operational period of the proposed development?</p> <p>Furthermore, does there need to be additional landowner consent for these paths?</p> <p>In response to ExA question 3SERT3 SCC [<a href="#">REP6-276</a>]</p> <p>SCC has set out what it would expect from a public</p>	<p>Whilst this question is not aimed at SCC, the Council would like to offer a response to clarify its position on whether permissive paths should be Public Rights of Way. The Council considers it appropriate for the proposed permissive route from the B1121 over the River Fromus bridge to the converter station site should be a permissive route. This is because a public right of way would be a permanent feature which means that SCC would incur the financial responsibility to provide a bridge if the Fromus bridge is removed. Recognising this, SCC's position has been that the implementation</p>

Ref. No	Topic	Question	SCC Response
		right of way. The ExA asks the applicant whether such standards and criteria be achieved for the proposed permissive path? If not, please explain why this could not be achieved? Furthermore, can the applicant clarify why the proposal is for a permissive path rather than a public right of way?	of the permissive route should match standards for Public Rights of Way in all other respects.
7.2	<b>Rights of Way</b>	<p><b>7.2 Public Right of Way (PRoW) mitigation</b></p> <p>For PRoW mitigation, SCC [REP6-184] has taken the view, in lieu of additional onsite mitigation/ offsetting being proposed by the applicant, that offsite measures would be the appropriate approach to secure offsetting and that this could be secured via a s106 with SCC.</p> <p>The ExA asks the applicant if this could be a way of mitigating the cumulative impacts to the PROW network?</p> <p>For the applicant and SCC, how would the level of contribution set within the s106 agreement be determined? If there is agreement on the provision of a s106 agreement to address this matter, please submit it at DL7 or set out a timeframe for submission.</p>	From SCC's engagement with the Applicant since Deadline 6, it is understood that the Applicant is not willing to enter a s106 (or similar) agreement. SCC has therefore proposed text to include as an article in the DCO to achieve the same goal of that agreement at Deadline 7 in the Council's summary of outstanding matters. That wording would secure financial contribution from the Applicant to carry out specified PRoW enhancement and creation activities as previously requested by the Council.
7.4	<b>Traffic and Transport</b>	<p><b>7.4 Monitoring and capping of heavy goods vehicle (HGV) movements</b></p> <p>The submitted outline Construction Traffic Management Plans (oCTMP) for both Suffolk [REP6-</p>	Refer to EA2-DWF-ENV-REP-IBR-000943 Rev 06 the EA2 OCTMP together with the recently discharged final CTMP for the substation site EA2-ONS-CNS-PLN-IBR-000014-ONSS

Ref. No	Topic	Question	SCC Response
		<p>[062] and Kent [REP6-064] commit the applicant to monitoring Heavy Goods Vehicles (HGVs) in terms of routes taken and arrival and departure delivery times. They also state that any issues would be resolved following reporting, which would be shared with the local highway authorities. The ExA ask that the local authorities and the applicant confirm if such monitoring would have similar results to capping with this monitoring in place. Is this not similar to capping HGVs on routes and access points to ensure the assessed worst-case scenario is not breached? Is it possible to amend and add to the wording within the oCTMPs so it would reflect that agreed under the East Anglia 2 oCTMP, which sets out what is being monitored and the stages of what would happen if breaches occurred?</p> <p>The ExA requires that the applicant work with the local highway authorities to agree wording on this matter.</p>	<p>which includes wording that has be found to be acceptable to the SoS during the DCO decision making process and local authorities when discharging the requirement. <sup>1</sup></p>
7.6	Traffic and Transport	<p><b>7.6 A12 capacity assessment</b></p> <p>SCC [REP6-184] states that a real-time, backward-looking assessment to see changes in journey time and delays would be achievable. However, there is an issue of how to disassociate individual scheme impact,</p>	<p>SCC would propose the following brief to assess journey times in East Suffolk. Whilst the authority has access to strategic models there is a cost involved in undertaking such a study. To be of use it is presumed that such a study should be completed during the decision period, and, in the absence of any current commitment by the Applicant to fund such a study, the ExA is requested to</p>

<sup>1</sup> See paragraph 2.2.1 of <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010078-005087-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan.pdf>

Ref. No	Topic	Question	SCC Response
		albeit this may be possible by reviewing monitoring data. The ExA asks SCC and the applicant to explain whether such an assessment is something that can be committed to and when should it be undertaken?	<p>include in its recommendations report a need for the Secretary of State to require the carrying out of the study and to seek an update on the outcome of such a study and to allow the-developer and LHA to comment on the findings before any decision is made on the Application.</p> <p style="text-align: center;"><b><u>Sealink. Brief for Assessment of Journey Time</u></b></p> <p><u>Scenarios to be modelled</u></p> <ul style="list-style-type: none"> <li>• 2024 Baseline (survey data)</li> <li>• 2028 Peak Year Baseline (2024 base + growth)</li> <li>• 2028 Peak Year Baseline + Cumulative Development (SPR 2028 Q2 from CTMP + SZC 2028 PY)</li> <li>• 2028 Peak Year Baseline + Cumulative Development (SPR 2028 Q2 from CTMP + SZC 2028 PY) + Project Peak</li> </ul> <p>Neutral Months only. Total journey time and change in relation to 2024 base</p> <p><u>Routes to be Modelled</u></p> <ul style="list-style-type: none"> <li>• A12 Woods Lane to B1121 Benhall</li> <li>• A12 B1121 Benhall to Yoxford</li> <li>• A12 Yoxford to Lowestoft (Bloodmoor Roundabout)</li> <li>• A1094 A12 to B1069 Knodishall</li> <li>• B1069 Tunstall to Leiston (Kings Road)</li> <li>• B1119 A12 to B1122 Station Road Leiston</li> </ul> <p><u>Times</u></p> <ul style="list-style-type: none"> <li>• AM peak 0700-0900</li> <li>• PM peak 1600-1800</li> <li>• Interpeak 1100-1300</li> </ul>

Ref. No	Topic	Question	SCC Response
7.7	Traffic and Transport	<p><b>7.7 Saxmundham junction</b></p> <p>In the SCC response [REP6-276] to question ExQ3TT9, regarding the B1121 Main Road/ B1119 Church Street signalised junction, it welcomes the cap of HGVs, but notes there is no junction modelling. SCC mention that there was Sizewell C (SZC) modelling. The ExA asks SCC whether it can use this modelling to ascertain approximately what the driver delay impacts would be to this junction if there were an additional 10 HGVs using it for the proposed development? If possible the ExA ask for this to be submitted into Examination.</p>	<p>The modelling was undertaken by KMC on behalf of SZC with the summary of the modelling is publicly available within the SZC Consolidated Transport Assessment. SCC does not have access to the original modelling but if the parameters such as movements and geometry are made available the model can be re-run using commercial software. Before doing so it will be necessary understand what the parameters modelled should be as these may differ from the original modelling, for example should the SZC baseline data be used or more recent data from Sealink traffic surveys (if available). For clarity the model will need to include the 10 HGVs plus any additional lighter construction vehicle as these too influence capacity and delay at the junction. In the event that the exercise is not undertaken in time to be submitted into the Examination, the ExA is requested to include in its recommendation report a similar recommendation to that suggested by SCC in response to item 7.6 above.</p> <p>SZC Consolidated transport Assessment 9.16 Junction 8 B1121 / B1119 Saxmundham Crossroads.</p> <p><a href="https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-005601-The%20Sizewell%20C%20Project%20-%20Consolidated%20Transport%20Assessment.pdf">https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-005601-The%20Sizewell%20C%20Project%20-%20Consolidated%20Transport%20Assessment.pdf</a></p>
7.9	Traffic and Transport	<p><b>7.9 Sizewell C traffic data</b></p>	<p>SCC received an email from the Applicant on 24 April 2026 12:11 and 28/04/2026 10:11 with additional information that is being</p>

Ref. No	Topic	Question	SCC Response
		<p>SCC [REP6-184] at point 22 states that it is still struggling to reconcile the data presented in [REP4-099] with that in the SZC Consolidated Transport Assessment. The ExA requires that the applicant communicate with SCC before DL7 and for both parties to provide an explanation to the ExA regarding the situation.</p>	<p>considered. The crux of the issue is a significant increase between the SZC 2019 survey and Sealink 2024 surveys particularly in the am peak. It is difficult to reconcile the difference in data as although SZC commenced in Jan 2024 the number of workers was low and construction traffic did not use the A1094 route. Nor was there other significant development in the area.</p> <p>SCC is reviewing this data but the concern will be that if the surveys are correct and this junction has experienced a significant increase in vehicles between 2019 and 2024 pushing it close to capacity without development then additional project related traffic will create delays until at least completion of all the projects (SPR, SZC, Sealink) which may be until 2032 or beyond.</p> <p>This matter needs further consideration not possible in the time between the information being received and D7.</p>
<b>7.10</b>	<b>Traffic and Transport</b>	<p><b>7.10 A12 sensitivity test</b></p> <p>SCC [REP6-184] states that as a minimum a sensitivity test is required to assess the cumulative impact of all nationally significant infrastructure project related construction vehicles on the A12 and elsewhere. The ExA requests that SCC and the applicant discuss a sensitivity test which could address SCC concerns and submit details to the ExA.</p>	<p>SCC Comment: Sensitivity test is designed to identify which junctions or links are under stress in terms of delay or congestion on the A12 and within the study area due to the cumulative impact of all projects (ie SPR, SZC, Sealink). This has not been discussed in detail with the Applicant as the Applicant considered that a sensitivity test would not be achievable during the remaining time left in the Examination. SCC maintains that the sensitivity test should still be done in the post-examination period and would ask the ExA to recommend that the Secretary of State require the Applicant to do so.</p>
<b>7.12</b>	<b>Traffic and Transport</b>	<p><b>7.12 Suffolk junction modelling</b></p>	<p>SCC has engaged specialist traffic modelling engineers to assist with detail review of the junction modelling. Unfortunately, the time</p>

Ref. No	Topic	Question	SCC Response
		<p>The applicant has submitted junction capacity modelling for three junctions in Suffolk [<a href="#">REP6-039</a>]. Please can SCC respond in detail to this modelling and explain how this affects SCC's overall view of traffic and transport impacts with the proposed development and cumulatively with other projects.</p>	<p>to procure such services at a late stage in the examination has meant it has not been possible to provide a response by D7. However, SCC will seek to submit this to the Secretary of State during the post-examination period.</p> <p>SCC would record that it has raised concerns about the scope of the study area specifically in terms of cumulative impacts from multiple NSIPs and has not 'agreed' the study area (5.1.4). Where initial discussions were held the authorities, position is that it could not agree to a study area until such time as the quantum of traffic was known. Verbal conversations were always caveated as 'without prejudice' and that the authority would always confirm its position in writing.</p> <p>A12/B1121 Junction Main Road, Benhall.</p> <p>Noted that the proposed development in combination with cumulative development and base flows will create an extended network peak from 0700 to 0900. (Table 10.1) ie 1513 movements 0700 to 0800 and 1528 between 0800 and 0900. Whilst less marked the cumulative construction traffic significantly increase traffic volumes between 1800 and 1900. As stated throughout the examination the LHA's concern is the cumulative impact of all NSIPs on the local network and not just this project in isolation.</p> <p>A1094 Aldeburgh Road / B1121 Aldeburgh Road Junction, Aldeburgh.</p>

Ref. No	Topic	Question	SCC Response
			<p>The traffic flows show a similar pattern albeit with the AM development peak 0700-0800 (1029 movements) now being the AM network peak (1013 movements) with the proposed development plus cumulative development scenario.</p> <p>A1094 Aldeburgh Road / B1069 Snape Road</p> <p>A similar pattern to the other sites with the AM development peak becoming the network AM peak in with similar traffic flows 1034 to 1030 vehicles creating an elongated peak. This would question the comment in 10.6.2 that claims that the AM peak is below the threshold as it is now between 0700-0800 where the Sealink contribution is 139 movements.</p> <p>Of concern is that the junction is operating over capacity for all cumulative scenarios, a great concern considering the potential overlap of these projects. The proposals to mitigate the project impacts in 10.6.1 would appear to be ineffectual in terms of reducing congestion as the modelling shows the junction is operating over capacity at these times. Reliance on avoiding specific journey times as mitigation would strengthen a case for robust controls and enforcement.</p> <p>As stated in previous representations the junction was not identified as suffering significant impact (10.6.12 ) as to do so two of the three arms of the junction would need to be affected which typically does not occur on three arm junctions.</p>

Ref. No	Topic	Question	SCC Response
			<p>Whilst the additional information and dialog with the applicant have been welcome has not resolved the LHA's concerns that the cumulative impact of multiple NSIP will be significant.</p>
<p><b>9.1</b></p>	<p><b>Tourism monitoring</b></p>	<p><b>9.1 Tourism monitoring</b></p> <p>The applicant [REP6-111] has stated that tourism monitoring is unnecessary in light of the assessment showing no significant effects. In any event the applicant does not consider that this would be possible to robustly monitor, particularly given the lack of a clearly evidenced pathway for how these adverse effects would occur. Furthermore, the applicant states that it would not be possible to isolate any marginal influence from the proposed development on tourism given the relatively modest scale of the proposed development in terms of extent, worker numbers and duration compared to a substantial project, such as SZC. The ExA asks all local authorities to respond to these comments and set out how in practice any results from tourism monitoring would be of value and how the impact of the proposed development could be discerned from other developments?</p>	<p>SCC has previously criticised the Applicant's assessment showing no significant effects on tourism such as in chapter 13 of [REP1-130], A7.10 of [REP2-062], table A9 of [REP3-122] and table A5 of [REP4-201]. For instance, the assessment's restrictive study area means the project's effects on tourism in the wider East Suffolk region are not considered. This includes effects on perception which may impact tourism in East Suffolk more widely than the immediate vicinity of the project, and effects on tourism from the disruption caused by the project, particularly on the A12 and associated junctions, discouraging tourism in the region. Moreover, the increasing presence of NSIPs in the region, some of which are not yet consented, including Sizewell C, means there is a great degree of uncertainty as to how tourism will be impacted. The unprecedented nature of this cumulative context means comparisons to the impacts previous projects such as Hinkley Point C cannot be relied upon.</p> <p>Monitoring is considered necessary for two reasons. The first is that, considering the aforementioned uncertainty and deficiencies in the Applicant's assessment, a precautionary approach is needed to ensure the effects being realised are known which would then inform what mitigation is appropriate. The second related but distinct point is that the tourism sector is a complex social and</p>

Ref. No	Topic	Question	SCC Response
			<p>economic system which means that mitigation interventions must be informed to be effective.</p> <p>SCC recognises that Sea Link’s contribution to impacts on tourism will be modest when compared to Sizewell C’s. It is also recognised that it may be difficult to disaggregate certain tourism impacts between what’s caused by Sea Link and what’s caused by other projects. However, it does not follow that no monitoring or mitigation measures are necessary in planning terms as a result. The precautionary principle should be followed where there is insufficient information or incomplete information to identify the extent to which Sea Link contributes to adverse effects on tourism.</p> <p>When monitoring indicators of the tourism industry’s health in East Suffolk in broad terms, such as perception, footfall and spend, one would expect to capture the effects of multiple projects as it is the cumulative effect of these projects in combination which is of concern. Once it is established that Sea Link is contributing to a particular cumulative effect, which can be achieved through mixed methodology research and, where needed, professional judgement, mitigation may be necessary in planning terms even if Sea Link’s contribution to that effect is not itself considered significant in isolation. That is the very purpose of cumulative effects assessments and the application of the mitigation hierarchy for cumulative effects.</p>

Ref. No	Topic	Question	SCC Response
			<p>SCC does not consider it necessary to perfectly disaggregate the contribution of each project for their impacts on these wider tourism sector indicators as this is an unachievable empirical threshold which would prevent an array of cumulative impacts which require mitigation in planning terms from being mitigated. SCC maintains that the data from mixed methodology research, in addition to consideration of known construction activities and collaboration between NSIP promoters and local authorities would allow reasonable conclusions of what mitigation is reasonable to be reached in most cases. Where the impact in question concerns a particular receptor in the vicinity of the proposed development, such as a hospitality business, these conclusions will be much more straightforward to reach.</p> <p>The proposed monitoring would certainly provide value. SCC provided wording at Deadline 6 [REP6-237] and updated in Appendix A of this document, for a Tourism Monitoring Plan which would ensure that monitoring is complementary to existing research activities. Of particular note is the monitoring being undertaken by ESC on behalf of Sizewell C through the signed Deed of Obligation between the parties which also motivates SCC’s request for the undertaking of monitoring to be done by ESC in the updated wording of that requirement. The magnitude and scope of the Sizewell C monitoring was not constructed to account for the cumulative effects of upcoming development and so will not fully capture those cumulative effects. The funding of ESC to expand</p>

Ref. No	Topic	Question	SCC Response
			<p>this workstream to account for Sea Link’s effects would ensure that a more accurate picture of the actualised effects is captured. This would also provide an avenue for upcoming projects such as Lion Link to feed into. The working group secured in SCC’s proposed requirement would also allow insights from tourism organisations, such as the Destination Management Organisation, and other NSIP promoters to bolster the set of available information on what tourism effects are occurring and what mitigation should be done.</p> <p>In summary, monitoring would rectify gaps in existing monitoring to account for Sea Link’s impacts which would subsequently inform what mitigation should be done.</p>
9.4	<b>Skills, Supply Chain and Employment Plan</b>	<p><b>9.4 Skills, Supply Chain and Employment Plan</b></p> <p>The ExA asks the applicant to respond to the Skills, Supply Chain and Employment Plan requirement proposal by SCC [<a href="#">REP6-237</a>] and either include this within the dDCO or explain why it is not necessary. Furthermore, the applicant is requested to respond to point 27 of [<a href="#">REP6-184</a>] where SCC sets out its comments on the currently submitted Skills, Supply Chain and Employment Plan [<a href="#">REP6-101</a>].</p>	<p>SCC maintains that a robust and enforceable Skills, Supply Chain and Employment Plan (SSCEP) is necessary to address cumulative construction-phase labour-market impacts associated with the project.</p> <p>SCC, together with East Suffolk Council, provided both verbal and written feedback on the draft Plan submitted by the Applicant. SCC does not consider that the submitted SSCEP adequately reflects that feedback. In particular, the Plan focuses predominantly on describing existing internal and corporate commitments, rather than setting out a locally responsive and mitigation-focused approach to cumulative skills, employment and supply-chain impacts arising from the concentration of NSIPs in Suffolk.</p>

Ref. No	Topic	Question	SCC Response
			<p>SCC is concerned that certification of the submitted SSCEP, either as a final plan under Requirement 5 or as an outline plan referenced under Requirement 6 of the draft Development Consent Order, would not provide sufficient assurance that cumulative impacts will be effectively managed. If treated as an outline plan, the Development Consent Order would require any subsequent detailed SSCEP to accord with that outline, constraining the ability to secure the additional commitments SCC considers necessary once greater certainty over workforce demand becomes available.</p> <p>In the absence of a satisfactory outline SSCEP, SCC considers that the alternative requirement wording proposed at item 15 of [REP6-237] provides the most appropriate and proportionate mechanism. This approach would ensure that a comprehensive SSCEP is prepared and approved post-consent, informed by up-to-date workforce information and developed in consultation with SCC through the Regional Skills Coordination Function, with clear governance and enforceability.</p> <p>SCC maintains that either the submission of a sufficiently strengthened SSCEP during the Examination, or the inclusion of the proposed requirement at item 15 of [REP6-237] within the DCO, is necessary to satisfy the mitigation hierarchy and to address SCC’s outstanding concerns. In SCC’s view, the SSCEP should not be relied on alone to discharge cumulative socio-economic</p>

Ref. No	Topic	Question	SCC Response
			mitigation. Securing an enhanced SSCEP through an appropriate DCO mechanism would resolve SCC's remaining concerns in relation to skills, education and employment.
10.2	<b>Health and wellbeing monitoring</b>	<p><b>10.2 Health and wellbeing monitoring</b></p> <p>The applicant, in response to ExQ3HW3 [REP6-111] states that it does not agree to the inclusion of a mental health and monitoring plan because the applicant does not consider that such a monitoring plan is possible due to there being substantial limitations, particularly regarding attribution and follow on mitigation. For all local authorities, respond and explain how these limitations, particularly relating to attribution and follow-up mitigation, could be addressed.</p>	<p>SCC acknowledges that there are methodological challenges associated with monitoring mental health and wellbeing impacts, including attribution and identification of mitigation. SCC does not however agree that such challenges render monitoring unachievable.</p> <p>The Applicant's position appears to be founded on the basis that monitoring must be capable of definitively isolating the effects of the Sea Link project from those of other schemes in order to be meaningful, and that such identification is not possible. SCC consider that through a multi-sourced approach, drawing on a combination of population health data, primary care activity, service referral patterns, structured engagement with Primary Care, Community Mental Health Teams and local stakeholders, alongside carefully designed qualitative tools, it would be possible to understand both project specific and cumulative effects in relation to other NSIPs. 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.</p>

Ref. No	Topic	Question	SCC Response
			<p>In previous representations, SCC has challenged the conclusions of the Applicant's assessment of mental health and wellbeing, including the conclusion that no significant effects are anticipated. Those concerns, as set out in the [REP6-182], reflect limitations in the Applicant's methodology in capturing lived experience, uneven impacts across communities and groups, and the prolonged and cumulative nature of mental health effects. Monitoring is therefore a necessary safeguard to assumptions made at assessment and to identify whether effects on the ground differ from, or are greater than, those anticipated.</p> <p>Importantly, the presence of cumulative schemes such as Sizewell C does not negate the value of monitoring, rather, it reinforces the need for it. Without monitoring, there is a significant risk that additive or interacting effects on mental health and wellbeing will go unrecognised until they escalate, particularly for communities already experiencing prolonged disruption and uncertainty. The Council's position is that coordinated monitoring, aligned where practicable across NSIP promoters, actively improves attribution rather than undermining it. Such an approach would allow emerging concerns to be examined collaboratively, reduce duplication and consultation fatigue, and support a clearer understanding of how different projects may be contributing to cumulative health and wellbeing effects.</p> <p>The Applicant's assertion that it would be impossible to identify reasonable and proportionate mitigation that could be delivered by</p>

Ref. No	Topic	Question	SCC Response
			<p>the Applicant to address the Project’s contribution to the overall effects reported is also not accepted. Monitoring is intended to inform adaptive mitigation type and methodology, focused on managing risk and reducing harm, not to establish liability in isolation. If monitoring identifies that wellbeing impacts are greater than anticipated within communities affected by the Proposed Project, there are a range of reasonable responses available to the Applicant, including adjustments to construction practices, enhanced engagement, respite based measures, targeted community support or coordination with other promoters where impacts are cumulative. The Applicant has already committed to monitoring and mitigation in relation to other environmental disciplines where attribution is similarly complex, including Air Quality. SCC’s position is that mental health and wellbeing should be treated consistently.</p> <p>SCC also notes that the measures proposed by the Applicant including the appointment of a Community Liaison Officer, whilst welcome, do not provide a systematic or evidence based mechanism of identifying health and wellbeing impacts, differential effects on vulnerable groups, or emerging patterns over time, nor do they support transparency or accountability in how wellbeing considerations are reviewed and addressed. Monitoring, by contrast, provides an evidence informed basis for engagement and mitigation and allows concerns to be addressed earlier and more equitably.</p>

Ref. No	Topic	Question	SCC Response
			<p>In public health terms, the absence of monitoring would represent a significant gap in the Project’s approach to mitigating harms and preventing the widening of health inequalities. Mental health and wellbeing impacts may evolve across the lifecycle of the project and through prolonged interaction with other NSIPs in the area. Without monitoring, the Applicant would have no structured mechanism to identify unanticipated or disproportionate impacts.</p> <p>For these reasons SCC maintains its view that a mental health and wellbeing monitoring plan is essential, proportionate and achievable.</p>
10.5	Radiation Emergency Plan	<p><b>10.5 Radiation Emergency Plan</b></p> <p>The applicant has included commitment GG41 to the REAC <a href="#">[REP6-134]</a> for a Suffolk Resilience Forum Radiation Emergency Plan. The ExA requires that SCC and ESC provide comments on this commitment.</p> <p>The ExA notes that GG41 as it stands does not include a timeframe for submission or a requirement to be agreed with SCC. The ExA requests that the applicant submits revised wording that has been agreed with SCC and ESC</p>	<p>SCC has made submissions previously criticising the cited commitment GG41 of the REAC and proposed wording for the DCO and for the REAC in <a href="#">[REP6-237]</a> covering commencement and pre-commencement activities respectively. Both of these additions are considered necessary. The wording provided at Deadline 6 remains SCC’s position in terms of what needs to be added to the DCO and REAC in terms of Emergency Planning. SCC understands that the Applicant will update the DCO and REAC with the wording provided by SCC at Deadline 7.</p>

**Appendix A: Additional proposed wording for the DCO**

Ref. No	DCO wording	Explanation
1	<p><u>Cable Works</u></p> <p>X-(1) <del>if</del> <b><u>Subject always to all necessary consent being obtained, if</u></b> the cables comprised within the Sea Link cable works are installed prior to the cables comprised within the LionLink cable works, the authorised project may not be brought into operational use unless the cable ducts forming part of the LionLink cable works have been installed concurrently with the installation of the cables comprised within the Sea Link cable works where the routes of the cable works for Sea Link and LionLink overlap.</p> <p>(2) The requirement in paragraph (1) is considered discharged if no Order for the LionLink cable works is made by the date on which the Sea Link cable works commences.</p> <p><b><u>(3) The applicant and LionLink applicant may enter into agreements with respect of the matters included in this requirement, and such agreements may contain such terms as to payment the parties consider appropriate.</u></b></p> <p><del>(3)</del> <b><u>(4) The applicant must use reasonable endeavours to obtain the necessary consents under this requirement.</u></b></p> <p><b><u>(5)</u></b> For the purposes of this requirement –</p> <p style="padding-left: 40px;">(a) “the Sea Link cable works” mean Work Nos. 2 and 5 of this Order; and</p> <p style="padding-left: 40px;">(b) “the LionLink cable works” mean the cable works which form part of the proposed electricity interconnector that will link the United Kingdom and the Netherlands via an offshore connection”.</p>	<p>At Deadline 6, SCC submitted <i>Appendix A to Suffolk County Council’s response to ISH 3 Action Points: Schedule of Changes to the DCO (Action Point 1)</i> [REP6-237]. It included, at row 17, a proposed new requirement concerning cable ducts.</p> <p>The applicant has explained it considers the requirement to be unenforceable because the applicant does not have the consents or powers to install ducts for LionLink. The applicant has also stated that it and the LionLink applicant (National Grid Ventures, NGV) are legally separate entities: the applicant is a regulated business and NGV is a commercial enterprise. The applicant considers installing ducts for LionLink would result in the applicant subsidising NGV and the applicant has said it is not allowed to do that. In the light of this feedback, SCC would amend the cable ducts requirement which was submitted at Deadline 6</p>

Ref. No	DCO wording	Explanation
2	<p><u>Mental Health and Wellbeing Monitoring Plan</u></p> <p>(X)-(1) No stage of the authorised development may commence until a Mental Health and Wellbeing Monitoring Plan has been submitted to and approved by <del>the relevant planning authority</del> <b>Suffolk County Council</b> following consultation with the relevant <del>county council</del> <b>planning authority</b>.</p> <p><b>(2)</b> The Plan must include –</p> <p><b><u>(a) details of the implementation of monitoring across socio-economic, environmental and transport indicators that may be relevant to the potential adverse effects of the authorised project on mental health and wellbeing in East Suffolk;</u></b></p> <p><del>(a)</del> <b>(b)</b> population health management data and trends in primary care activity;</p> <p><del>(b)</del> <b>(c)</b> the monitoring of referrals to social prescribing and community mental health services;</p> <p><del>(c)</del> <b>(d)</b> provision for engagement with primary care leads within the project catchment to identify emerging trends;</p> <p><del>(d)</del> <b>(e)</b> provision for regular liaison with community mental health teams;</p> <p><del>(e)</del> <b>(f)</b> clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately);</p>	<p>At Deadline 6, SCC submitted <i>Appendix A to Suffolk County Council’s response to ISH 3 Action Points: Schedule of Changes to the DCO (Action Point 1)</i> [REP6-237]. It included, at row 19, a proposed new requirement concerning mental health and wellbeing monitoring plan in Suffolk.</p> <p>Since Deadline 6, SCC’s public health team has suggested amendments to the new requirement. These include replacing the “relevant planning authority” as the body which approves the Mental Health and Wellbeing Monitoring Plan with “Suffolk County Council”. The justification for this change is to ensure the local authority responsible for public health is responsible for approving the Plan (in consultation with the relevant planning authority).</p> <p>New sub-paragraph (2)(a) includes additional detail about what the Plan must include and new sub-paragraphs (3)(b) requires the Plan to explain how Suffolk County Council will monitor the matters included in the Plan.</p>

Ref. No	DCO wording	Explanation
	<p><del>(f)</del> <del>(g)</del> periodic reporting to <del>relevant local authority</del> <b>Suffolk County Council</b> and health partnership forums to enable two-way dialogue;</p> <p><del>(g)</del> <del>(h)</del> consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND and the University of Suffolk; and</p> <p><del>(h)</del> <del>(i)</del> provision for following <del>SGC's</del> <b>Suffolk County Council's</b> guidance on community engagement.</p> <p>(2) The undertaker must coordinate with other NSIP developers within Suffolk to ensure a coherent approach to monitoring across geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts.</p> <p>(3) The Plan must detail –</p> <p><b>(a)</b> how the <b>Applicant undertaker</b> will establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with <del>see</del> <b>Suffolk County Council</b> and other relevant stakeholders. The mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that</p>	

Ref. No	DCO wording	Explanation
	<p>access to healthcare impacts are addressed effectively and transparently; <b>and</b></p> <p><b><u>(b) how Suffolk County Council will monitor the matters included in the Plan”.</u></b></p>	
	<p><b><u>Tourism Monitoring Plan</u></b></p> <p><b><u>Tourism monitoring – Suffolk</u></b></p> <p>[X].– (1) No stage of the authorised development may commence until a Tourism Monitoring Plan has been submitted to and approved by East Suffolk Council following consultation with Suffolk County Council. The Plan must include –</p> <p>(a) confirmation that the implementation of any monitoring activity provided for in the Plan will be carried out by East Suffolk Council;</p> <p>(b) detail of the implementation of monitoring across socio-economic, environmental and transport indicators, including perception, spend and footfall, that may be relevant to the potential adverse effects of the authorised project on tourism in East Suffolk;</p> <p>(c) detail of how any monitoring or mitigation activity will be carried out in consideration of, and complimentary to, existing and ongoing tourism strategies in East Suffolk;</p>	<p>At Deadline 6, SCC submitted <i>Appendix A to Suffolk County Council’s response to ISH 3 Action Points: Schedule of Changes to the DCO (Action Point 1)</i> <b>[REP6-237]</b>. It included, at row 16, a proposed new requirement concerning tourism monitoring in Suffolk. Since depositing that document, SCC has reviewed the requirement’s contents and considers the amendments made below provide greater clarity than was included before in terms of where any mitigation activity will be carried out. A small number of other minor / tidying up amendments have been made to the proposed requirement.</p> <p>SCC engaged with ESC prior to Deadline 7 and has updated the requirement wording based on this feedback. In particular, the requirement secures that the monitoring would be carried out by ESC and any funds for mitigation would be administered by ESC. This is considered necessary for the reasons set out in response to item 9.1 of this letter to ensure any monitoring and mitigation activities are effective.</p>

Ref. No	DCO wording	Explanation
	<p>(d) detail of how any monitoring or mitigation activity will complement existing and ongoing mitigation and monitoring in relation to tourism in East Suffolk carried out by undertakers of other nationally significant infrastructure projects in East Suffolk;</p> <p>(e) the establishment of a working group (consisting of officers from East Suffolk Council, Suffolk County Council and such other person they consider appropriate to invite to join) which will –</p> <ul style="list-style-type: none"> <li>(i) facilitate engagement with recognised tourism representative bodies;</li> <li>(ii) have a governance structure which includes a process for decision making and implementing monitoring, mitigation and adaptive management measures associated with the authorised development;</li> <li>(iii) develop and agree its own terms of reference; and</li> <li>(iii) agree and establish appropriate mechanisms for collecting, analysing, and acting on data that is appropriate and supportive of the tourism sector;</li> </ul> <p>(f) a mechanism for securing a fund for mitigation measures which is to be administered by East Suffolk Council, and which is to be informed by, and proportionate to, the impacts identified by</p>	<p>How this requirement is intended to work is that it will require a monitoring plan to be submitted to and approved by ESC which includes provision for appropriate governance structures between the Applicant, the local authorities and relevant tourism organisations to oversee monitoring and its results and make informed decisions on what mitigation should be done. This would also provide a space for undertakers of other NSIPs in the region to participate to ensure decisions taken by the working group complement existing activities in the tourism industry. The documents submitted to discharge this requirement would also require a legal mechanism for a mitigation fund to be agreed, which would be administered by ESC</p>

Ref. No	DCO wording	Explanation
	<p>monitoring activities pursuant to paragraph (1). This mechanism will be agreed by East Suffolk Council and Suffolk County Council.</p> <p>(g) a procedure to report the results of the implementation of the Tourism Monitoring Plan to the working group established under sub-paragraph (e), including a mechanism for adapting the Plan based on the reported results.</p> <p>(2) The mechanism for securing a fund under paragraph 1(f) must include provision for –</p> <ul style="list-style-type: none"> <li>(a) calculating the quantity of the fund;</li> <li>(b) detailing how and when funds would be released by East Suffolk Council and to whom;</li> <li>(c) the involvement of the working group in any decision made in respect of the fund;</li> <li>(d) preventative measures to reduce adverse impacts on tourism to be agreed with the working group; and</li> <li>(e) the recovery of reasonable costs incurred by East Suffolk Council pursuant to activities undertaken under this requirement.</li> </ul> <p>(3) In this requirement, “recognised tourism representative bodies” includes Suffolk Coast Destination Marketing Organisation, the Local</p>	

Ref. No	DCO wording	Explanation
	Visitor Economy Partnership, and the Suffolk & Essex Coast & Heaths National Landscape.	
	<p><b><u>Temporary drainage – Suffolk</u></b></p> <p>X. —(1) No temporary works which form part of the authorised project as shown on Sheet 1 of the Works Plans – Suffolk and</p> <p>(2) No part of Work No.3A (access road to the Suffolk Converter Station) may commence until a temporary drainage solution has been agreed with the lead local flood authority and the Environment Agency and details of that solution have been submitted to and approved by the lead local flood authority following consultation with the Environment Agency.</p> <p>(3) The works referred to in sub-paragraphs (1) and (2) include pre-commencement operations.</p> <p>(4) In this requirement, “temporary drainage solution” means a drainage solution to replace pond reference TC-45-ATPN in the Outline Drainage Strategy – Suffolk.</p>	<p>This requirement was not proposed in SCC’s Deadline 6 submissions. However, following conversations with the Environment Agency, it is considered necessary given the current state of the application in terms of the outline Drainage Strategy for Suffolk [REP5-083]. In particular, the drainage solution labelled TC-45-ATPN in that document is the one located by the temporary construction compound by the B1121 and haul road which is located within Flood Zone 3 and is currently proposed to be an attenuation basin. SCC and the Environment Agency have made previous submissions, including during ISH 3, on the issues with the Applicant’s proposed solution. From SCC’s understanding, this part of the outline Drainage Strategy for Suffolk has not been updated for Deadline 7. If this is correct, then this requirement is considered necessary since the final Drainage Strategy will be in accordance with the outline plan and so the Applicant would not be required to find an alternative solution.</p> <p>However, it should be noted that SCC considers the best solution to this issue is for the outline Drainage Strategy to be updated to reflect an agreed solution between SCC, the EA and the Applicant. SCC is open to</p>

Ref. No	DCO wording	Explanation
		engaging with these parties after the close of examination to reach agreement on a solution to this matter.