The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.23: Statement of Common Ground Between National Grid Electricity Transmission and Suffolk County Council

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nationalgrid

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Version

Date	Version	Status	Description / Changes
January 2025	A	DRAFT	Issued to PINS for Deadline 3
May 2026	B	Final	Final signed document issued to PINS.

1. Introduction

1.1 Overview

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

1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the Applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matter's that are under discussion.

1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

1.2 This Statement of Common Ground

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

1.2.2 Part 2 of the **Local Impact Report (LIR) from any local authorities [REP1-130]** submitted by Suffolk County Council at Deadline 1 confirmed that the Council objects to the Proposed Project.

1.2.3 LIR from any local authorities [REP1-130] submitted by Suffolk County Council at Deadline 1 remains the Council's primary assessment of the impacts of the Proposed Project, and has a particular status in the decision making process as under Sections 104(2)(b) and 105(2)(a) of the Planning Act. The Examining Authority and the Secretary of State must have regard to any LIR submitted when deciding the application. It should be noted that the volume of matters raised by SCC in its LIR and Relevant Representation means some may not be documented in this SoCG. For such matters, it should not be presumed that they are resolved. This document should be read in conjunction with SCC's examination submissions.

1.2.4 The aim of this SoCG is therefore to help the Examining Authority by confirming which matters are agreed and by identifying which matters are not agreed. This SoCG builds upon **Updated version of Principal Areas of Disagreement Summary Statements (PADSS) [REP5-185]** submitted by Suffolk County Council at Deadline 5. Where issues

are not identified in this document it is because they are either not in dispute or they are not considered material and important to the determination of the application.

1.2.5 It should be noted that a combined SoCG with both East Suffolk Council (ESC) and SCC was submitted with the DCO application (**Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329]**). As agreed with both Councils, the combined SoCG was split into one for each Council so that the positions being raised by each could be responded to more directly and in order to keep each SoCG more focussed on the issues relevant to them. **Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062]** was submitted at Deadline 3.

1.2.6 Since then, Section 3 Areas of Discussion Between the Parties has been restructured following further discussions with SCC in order to ensure the SoCG is reflecting the latest positions of both Parties and so it is more focussed on the matters to be agreed. Section 3.1 now commences with the matters from SCC's Deadline 5 Principal Areas of Disagreement Summary Statement (PADSS) which are still under discussion, with points still under discussion for each environmental topic area in Section 3.2. Section 3.3 contains the matters which have already been agreed in previous iterations of the SoCG prior to Deadline 5.

1.2.7 This SoCG has been progressed during the examination period to reach a final position between the Applicant and SCC and to clarify if any issues remain unresolved. Engagement to resolve certain matters took place between the parties following Deadline 6. It is indicated where changes to application documents, particularly the DCO and control documents, are required for items to be considered "Agreed". Where this applies, should the changes described in SCC's position not be reflected in the Applicant's Deadline 7 submissions, that matter is to be considered "Not Agreed".

1.2.8 For the purpose of this SoCG, the Applicant and SCC are jointly referred to as the "Parties". When referencing SCC alone, they are referred to as "the Consultee", "the Council" or "SCC".

1.3 The Role of SCC in the DCO Process

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

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

- Providing the local perspective at the pre-application stage, in addition to any views expressed directly to the applicant by residents, groups and businesses.
- Preparing written representations, SoCGs and Local Impact Reports ready for examination.

- Attending and participating in hearings and/or accompanied site visits.
- Discharging certain of the requirements associated with a DCO if consent is granted.
- Monitoring certain DCO provisions and requirements.

1.4 Description of the Proposed Project

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

1.5 Format of Document and Terminology used.

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

1.5.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed' or 'not agreed but not material'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved. 'Not agreed but not material' indicates that although the parties have not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed.

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

Table 1.1 Abbreviations

Abbreviation/Term	Definition
AC	Alternating Current
AIL	Abnormal Indivisible Load
AIS	Air Insulated Switchgear
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQS	Air Quality Strategy
ASTI	Accelerated Strategic Transmission Investment
BPM	Best Practical Means
BNG	Biodiversity Net Gain
CCS	Carbon Capture and Storage

Abbreviation/Term	Definition
CEA	Cumulative Effects Assessment
CEMP	Construction Environment Management Plan
CIPD	Chartered Institute of Personnel and Development
CoCP	Code of Construction Practice
CRTN	Calculation of Road Traffic Noise
CTMP	Construction Traffic Management Plan
CTMTP	Construction Traffic Management and Travel Plan
DCO	Development Consent Order
DMP	Dust Management Plan
DMRB	Design Manual for Roads and Bridges
DRP	Design Review Panel
EA	Environment Agency
EIA	Environmental Impact Assessment
EMF	Electrical and Magnetic Forces
EPUK	Environment Protection UK
ES	Environmental Statement
ESC	East Suffolk Council
ESDAL	Electronic Service Delivery for Abnormal Loads
FEED	Front End Engineering Design
FRA	Flood Risk Assessment
FTE	Full Time Equivalent
HER	Historic Environment Record
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle

Abbreviation/Term	Definition
HRA	Habitats Regulations Assessment
HUDU	Healthy Urban Development Unit
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IAQM	Institute of Air Quality Management
IEMA	Institute of Environmental Management and Assessment
KCC	Kent County Council
LCA	Landscape Character Area
LGV	Light Goods Vehicle
LLFA	Lead Local Flood Authority
(Outline) LEMP	(Outline) Landscape and Ecology Management Plan
(Outline) LEMS	(Outline) Landscape ecology management Strategy)
LHA	Local Highway Authority
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
NE	Natural England
NESO	National Electricity System Operator
NGET	National Grid Electricity Transmission
NGV	National Grid Ventures
NaFRA	National Flood Risk Assessment
NMU	Non-Motorised Users
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
NSIP	Nationally Significant Infrastructure Project

Abbreviation/Term	Definition
NSR	Noise Sensitive Receptors
NVMP	Noise and Vibration Management Plan
OCSS	Offshore Coordination Support Scheme
OWSI	(Outline Onshore) Overarching Written Scheme of Investigation
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PIA	Personal Injury Accident
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Rights of Way
REAC	Register of Environmental Actions and Commitments
RSPB	Royal Society for the Protection of Birds
SBIS	Suffolk Biodiversity Information Service
SCA	Seascape Character Area
SCC	Suffolk County Council
SCCAS	Suffolk County Council Archaeological Service
SCHAONB	Suffolk Coast & Heaths Area of Outstanding Natural Beauty
SCZ	Secondary Consultation Zone
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SPR	Scottish Power Renewable
SRN	Strategic Road Network

Abbreviation/Term	Definition
SSSI	Site of Special Scientific Interest
STGO	Special Types General Order.
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plans
TA	Transport Assessment
TAN	Traffic Assessment Note
TCPA	Town and Country Planning Application
TRO	Traffic Regulation Orders
TTM	Temporary Traffic Management
UXO	Unexploded Ordnance
WHO	World Health Organisation
WFD	Water Framework Directive
WSIs	Written Schemes of Investigation

2. Record of Engagement

2.1 Summary of discussions

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

3. Areas of Discussion Between the Parties

3.1 Matters raised in SCC Principal Areas of Disagreement Summary Statement at Deadline 5

Table 3.1 Access Routes for Construction

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.1.1	**Application Document Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-125]**	Selection of access route and assessment of alternatives	See Chapter 11 of [REP1-130] for further details. 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.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.	The Applicant has responded to **[REP4-149]** in **Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]** building on the details previously shared in the justification document previously submitted. Robust and thorough consideration has been given to alternative access routes to the Saxmundham Converter Station throughout the development of the Proposed Project, and this has included a route that would incorporate the Sizewell Link Road. This includes in depth meetings on the topic before the application was submitted between the project team, senior staff at National Grid and SCC. The identification of the proposed access route (from the west off the B1121) is a result of a balanced and reasoned judgement taking account of relevant factors. The Applicant strongly disagrees that alternative routes have not been considered adequately, they have been extensively considered, assessed and discussed; with evidence submitted with the Application and supplemented during Examination. The access route included in the application performs best from a highways, environmental and project perspective.	Not Agreed
	Application Document Appendix A (Alternative Access Route to Saxmundham Converter Station) with Map [REP5-179] **Application Document**		SCC recognises that further information was provided by the Applicant on consideration of the alternative access route proposed by SCC (see [REP3A-031], [REP4-149], [REP5-178], [REP5-179] and [REP6-141] for more details on SCC's proposal). However, the substance of the issue remains not agreed as per the item above.	It is common ground between SCC and the Applicant that the route identified by SCC in **Application Document Appendix A (Alternative Access Route to Saxmundham Converter Station) with Map [REP5-179]** is the alternative 'northern access' that SCC would like to see assessed further and is also the route that the Applicant responded to in **REP5-125**. It is also common ground that SCC made the Applicant aware of this northern access prior to the submission of the DCO Application (and again during Compulsory Acquisition Hearing 1) and the Applicant assessed this route as set	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-125] **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**			out in Section 3.8 of **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** as well as in **Application Document Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-125]**.	
3.1.2	**Application Document 9.112 (A) Benhall Railway Bridge – Crossing Feasibility Study [REP4-101]** **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**	Use of Benhall Railway Bridge, B1121	Without repair or replacement of the Benhall Bridge by the Applicant, repeated disruption will occur as a result of closing the bridge for AIL movements both for this project and for Lion Link which is an inevitable consequence should that project get consent. See A1.1 & A5.1 of [REP2-062], [REP3A-031] and Chapter 11 of [REP1-130] such as paras 11.222 to 11.229 for further details. Significant concerns relating to the proposed use of the Benhall Railway Bridge, B1121, a Council asset which, due to its structural condition, has a weight restriction of 46 tonnes (STGO 1). The Applicant has proposed overbridging for Abnormal Indivisible Loads (AIL) movements, however due to the geometry of the bridge and its proximity to the A12, the Council has concerns over the feasibility of this solution. Concerns include impacts of disruption whilst works are ongoing, including greater levels of traffic due to diversion through Saxmundham and A12/B1119 Rendham junction, lack of evidence on total number of movements that exceed the current weight limit, coordination of bridge closures with traffic related to other NSIPs in the area including Sizewell C and Scottish Power Renewables projects (SPR), lack of detail on temporary traffic management to mitigate impacts of work relating to the bridge. As per the current access route, the railway bridge would form critical infrastructure to deliver the Sea Link scheme, therefore joint engagement with all relevant stakeholders is required, including Suffolk County Council (as asset owner) and Network Rail (due to the interaction with the East Suffolk Line). To date, there has been a lack of detail demonstrating the feasibility of the mini-bridge option which SCC, as the Local Highway Authority, requires at this stage to provide meaningful comment. The Council recognises that the Applicant has produced a feasibility study [REP4-101] but does not consider it to demonstrate feasibility of any of the AIL delivery options. SCC has commented on this document at Deadline 5.	The Applicant acknowledges that there is currently a 46 tonne (STGO 1) weight limit on the Benhall Railway Bridge, which therefore makes the bridge suitable for the vast majority of the Applicant's proposed construction traffic. The benefit of using this access for the majority of construction traffic is that it limits the impact of that traffic due to it representing the shortest distance to the primary highway network, reducing overall journey times. Only a limited number of vehicles over 46 tonnes will be required, with the contractors aware of the weight limit and able to plan the works with that access constraint in mind. There are a limited number of vehicles including piling rigs, cranes and transformer delivery vehicles that would be greater than 46 tonnes and would need either mitigation at the Benhall Railway Bridge or use of an alternative access route. The Applicant agrees with SCC that the preferred option for access of the limited number of vehicles over 46 tonnes is to undertaken remedial works to the bridge where those works are determined to be proportionate and practicable, considering the project programme and any requirements of SCC and Network Rail that may emerge. To progress this preferred option the Applicant is working with SCC and Network Rail to undertake a structural survey of the bridge to inform the scope of the remediation works required. The survey works will now not be undertaken until post examination. An Approval In Principal (AIP) for the survey was submitted to SCC in November 2025 and the Applicant welcome	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			SCC's preference, out of the options proposed by the Applicant, is for the bridge to be strengthened to provide long-term benefits and remove the need for future projects using the same access route to also implement the mini-bridge option. SCC is in the process of commissioning structural surveys at the request of the Applicant to determine the feasibility of strengthening the bridge. The results of this will likely not be known until after the end of the Examination. The Council considers that there has been a lack of exploration of alternatives such as provision in the Order Limits for installation of a new nearby bridge. Due to the lack of available information on the feasibility of the Applicant's AIL route options, SCC cannot be confident that the project has a robust AIL route. It should be noted that the alternative of the B1122 and B1069 added by the Applicant at Deadline 4 includes several structures which either have not been assessed, or are unsuitable, for the classification of loads to be transported by the Applicant and so does not provide a robust alternative. SCC has produced wording for a commitment to prioritise Option 1 as far as possible in response to Action Point 13 of ISH 3 [REP6-184]. That commitment would also secure that the bridge would be repaired or replaced after construction is completed to ensure a lasting benefit is secured which is justified based on the repeated disruption of the mini-bridge option in such a scenario, along with the long-term resilience repair of the bridge would provide should further AIL movements be required following the construction period and for future projects. At present, there is no commitment in the outline CTMTP to repair the bridge should it be feasible, or at the very least, repair the bridge at the end of the construction period should the works not be feasible during the construction period. For the reasons outlined in this item, and in [REP6-184], SCC considers that such a commitment is necessary and that mere preference is insufficient and lacks enforceability. Therefore, this item is not agreed.	comments from SCC on the AIP received in March 2026. The above mentioned survey will also inform the mini bridge design which would be agreed with SCC should the preferred remedial option not be required. A working area plan of the mini bridge option has been provided at Deadline 6 to provide further details on this option. The Applicant has confirmed that should the mini bridge option be adopted, then a maximum of 15 separate installations over the construction period would be required. The Applicant's Traffic Co-ordinator will liaise with SCC, other developers and Suffolk Constabulary on the timing of these installations and the associated B1121 road closures to minimise impacts. The Applicant has also included an access route for vehicles over 46 tonnes that would leave the A12 at the Yoxford roundabout and use the B1122 through Leiston to access the Applicant's proposed haul road from BM04. This route is part of the confirmed AIL access route to be used by SPR under the DCO consent for EA1N and EA2 windfarms. SCC have raised concerns over structures on the A12 and along the SPR proposed AIL route that require assessment. It is noted that SPR and SZC are undertaking structural surveys along their AIL routes post consent which is normal practice for NSIP projects. The Applicant plans to undertake these assessments post consent as well, when the loadings have been determined following detailed design and closer to the time of proposed use to allow for any changes in the structural condition of the structures which SCC have highlighted can change at any point.	
			The Applicant's position in this item accurately depicts the common ground between the parties on the Benhall Bridge when read in the context of the outstanding matters set out in the item above. The exception is the final paragraph of the Applicant's position which is responded to in the final paragraph of SCC's position in this item. Whilst SCC accepts that the Applicant will undertake AIL route assessments post-consent, it does so recognising that SCC's preference is to do these assessments at the earliest opportunity and that by delaying this until pre-commencement places a greater risk on the applicant that weak structures are identified on the network which prevents or delays AIL movements, or that SCC does not have the resources available at the time the applicant submits the assessments for review which would also cause delay. Currently SCC is reviewing	It as a matter of common ground that the preferred solution for both parties is for the existing bridge to be strengthened. This will provide long-term benefits and remove the need for future projects using the same access route to also implement the mini-bridge option. It is also a matter of common ground that SCC are in the process of commissioning a structural survey of the bridge at the request of the Applicant that is required to determine the feasibility of strengthening the bridge. It is further common ground that the results of this survey will likely not be known until after the end of the Examination, and that a backstop option (in the event that it is not possible to strengthen the existing bridge)	Agreed (except final paragraph of each position)

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			assessments on the A12 between Ipswich and Lowestoft up to and including STGO3 loads (not special order) for SZC and expects other applicants to submit assessments to include routes for EA2, Bramford to Twinstead and Norwich to Tilbury in the next 12 months creating a significant package of work. Whilst it is acknowledged that other NSIPs have taken the approach of post-consent AIL route assessments, SCC does not consider this the preferred approach as there is not a viable route confirmed at the consenting stage of the application which may jeopardises the Applicant's ability to deliver the project. As of 5th May the A12 has been downgraded to no longer allow AIL movements of STGO3 and above which is one example of the issues which arise on this approach.	is required. The same survey will also inform the mini bridge design which would be agreed with SCC should the preferred remedial option not be practical. It is also a matter of common ground that the detailed assessment of AIL routes and structural assessment of structures is planned after consent, and has been carried out at that time on other NSIPs, including on Suffolk NSIPs such as Sizewell C.	
			In addition, a more thorough assessment of the likely adverse effects during closures of the Benhall Bridge is required as detailed by SCC in its representation on Change Request 1 [REP3A-031]. This includes the adverse effects will be experienced by residents of the nearby Whitearch residential park not just in terms of their access, and how their access, including both 'routine' day to day trips and also less frequent but important trips such as emergency access and/or removals, will not be compromised. This also includes the likely effects on the residential park in other aspects such as in terms of noise and vibration, air quality and health and wellbeing as it is a receptor not thoroughly assessed in the ES which was carried out when the Order Limits were not close to this receptor. A more detailed assessment is also required in relation to the likely traffic and transport effects during closures of the Benhall Bridge. The addendum to the ES [CR1-055] appears to show minimal changes in traffic during closures of the Benhall Bridge along the indicative diversion route. To be clear, the assessment should cover not only the Applicant's diverted traffic but also diverted baseline traffic and consideration of diverted traffic from cumulative projects such as EA1N, EA2 and SZC which use the B1121 for non-HGV traffic. Further detail is given in [REP3A-031]. As of Deadline 5, this information has not been provided.	See the **Application Document 9.112 (A) Benhall Railway Bridge – Crossing Feasibility Study [REP4-101]**. A full assessment of likely significant effects that could result from the two bridge options is provided within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. The assessment is in line with that provided for the rest of the Proposed Project and proportionate to the changes introduced. The Applicant met with Whitearch Residential Park to assure them that they will have access to their park, and emergency vehicles will be able to access their park at all times during the works on the bridge. This commitment is also now included in **Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk [REP4-061]** submitted at Deadline 4 (which has also been updated since at later Deadlines). Two additional air quality monitoring locations have now been included in **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [REP6-076]** (which was issued at Deadline 6). These are located at Whitearch Residential Park and Shotts Meadow and will measure NOx, NO_2, PM_{10} and $PM_{2.5}$. The Applicant acknowledges that there will be some interaction between redistributed Baseline traffic and also construction related vehicles associated with other cumulative developments during the closure of the Benhall Railway bridge. However, Table 3.9 of **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]** shows that redistributed Baseline traffic is only expected to result in a small adverse magnitude of change on the B1121 Main Road North (east of the A12, to the north of Saxmundham). Otherwise, a	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				negligible or beneficial magnitude of change (the latter due to a reduction in Baseline traffic on certain parts of the network following the bridge closure) is expected across the remainder of the network, including the A12 and the A12/B1119 junction. Therefore, there is not expected to be the potential for significant cumulative effects as a result of redistributed baseline traffic when combined with cumulative traffic of other cumulative schemes. Nonetheless, as requested, the Applicant has reviewed the potential implications of redistributed Baseline traffic during the short duration of any closures to Benhall Railway Bridge, combined with peak construction traffic of the Proposed Project and peak construction traffic associated with all assessed cumulative schemes, even though this is not a scenario which is expected to materialise (see reasons further below). Based on Table 3.9 of **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]** the following receptors show potential increases in total traffic due to redistributed Baseline traffic: • A12 between B1121 Main Road junctions (S-RL3); • A1094 between A12 and B1069 Snape Road (S-RL10); • A12/ B1119 Junction (S-RJ3); • A12/ B1121 Main Road (North) Junction (S-RJ4); and • A1094/ Sternfield Road/ Church Road Junction (S-RJ14) The above includes the receptors that have previously been assessed and will be used by construction traffic associated by the Proposed Project. The newly identified receptors (B1121 Main Road north of Saxmundham, B1119 Rendham Road, Grove Road and Sternfield Road) do not form construction routes for the Proposed Project or the cumulative schemes (Sizewell C, EA1N, EA2 and LionLink) and are not therefore expected to be impacted beyond redistributed Baseline traffic which has already been assessed within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. As reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**,	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				the Proposed Project is expected to result in Negligible effects for all assessments of the above listed receptors during the peak construction phase, except for Minor adverse effects for the A1094 between A12 and B1069 Snape Road (S-RL10) in terms of Severance, Pedestrian Delay and Driver Delay. As reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**, whilst there is the potential for Minor/ Moderate cumulative effects to arise on the A1094 between A12 and B1069 Snape Road (S-RL10) in terms of Severance, Pedestrian Delay and Driver Delay, this was considered to be Not Significant because the effect of each individual project was either Negligible or Minor, and the peak construction phase of each scheme is unlikely to fully overlap. In addition, cumulative effects along the A1094 as a result of the Proposed Project and both East Anglia One North (ID5) and East Anglia Two (ID6) are expected to be lower than the levels identified, as Friston substation will only be built once i.e. as part of EA1N/ EA2 or the Proposed Project (not both). Therefore, the cumulative assessment overestimates potential impacts on the A1094 as this includes double-counting of Friston substation trips. The conclusions above are considered to remain unchanged in the unlikely scenario that Benhall Railway Bridge is closed at the same time as peak construction traffic for the Proposed Project in combination with peak construction traffic of all assessed cumulative schemes (again, a scenario which is not expected to arise – see further below). There will only be a 7% increase in total traffic on the A1094 (S-RL10) due to redistributed Baseline traffic under this scenario, which is not expected to result in the potential for significant cumulative effects, particularly given the above double-counting of construction trips between the Proposed Project and EA1N/ EA2 where any potential impacts would be lower than those assessed. In terms of the other receptors (S-RL3, S-RJ3, S-RJ4 and S-RJ14), no potential for significant cumulative effects have previously been identified as the impact of peak construction traffic associated with the Proposed Project impact would be Negligible. Therefore, whilst increases associated with redistributed Baseline traffic during closure of Benhall Railway Bridge could potentially increase the effect from Negligible to Minor on these receptors (due to higher magnitudes of	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				change), this would as a worst-case result in the potential for a Minor cumulative effect to arise, when combined with peak construction traffic of all cumulative schemes combined. The same conclusion is reached that any Minor cumulative effects would be Not Significant, in line with the assessment matrix within **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**. In view of the above, there is not expected to be the potential for significant cumulative effects to arise under the unlikely scenario that any temporary closures to Benhall Railway bridge coincide with peak construction traffic of the Proposed Project as well as peak construction traffic associated with all assessed cumulative schemes. The below sets out further rationale in support of this position. In the scenario that Option 1 (mini-bridge) is adopted, this will be planned to be implemented at weekends in order to minimise disruption. If Option 2 (repair the bridge) is adopted, then this will be implemented early in the programme (late 2026, or in 2027), reducing the likelihood of this overlapping with the peak construction phases of EA2 (early 2026), EA1N (2028), Sizewell C (2028/2029) and LionLink (2029/2030). A Transport Co-ordinator will be in place to collaborate with SCC and third-party cumulative schemes to minimise any short-term disruptions in the interest of safe and efficient delivery of the Proposed Project (secured as part of **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7). The works at Benhall Railway Bridge (both options) will also be scheduled to avoid periods when main (peak assessed) construction traffic movements associated with the Proposed Project are required. Project HGVs will not use any proposed diversions through Saxmundham when Benhall Railway Bridge is closed, which is a commitment that was added to **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7. Lastly, it is reiterated that the temporary closure of the Benhall Railway bridge and associated diversion of Baseline traffic would only be in place for a short-term limited duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts. Local access will	

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				be retained meaning that not all Future Baseline traffic flows will be redistributed, which is how traffic was assessed for robustness. Therefore, the Applicant maintains that the Benhall Railway Bridge works are unlikely to alter the Proposed Project's interactions with other developments and that no further cumulative assessment work is required in this regard; notwithstanding the additional exercise which has now been completed above. The Applicant welcomes further discussions with SCC Highways on this matter including consideration of additional measures for inclusion within **Application Document 7.5.1.1 Outline Construction (F) Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 which has been updated throughout Examination, to further minimise any potential impacts during the Benhall Railway Bridge works. As discussed during the transport thematic meeting with SCC Highways on 22 January 2026, this could include the potential for a temporary speed limit reduction on the A12 corridor between and including the A1094, B1121 Main Road (south) and B1119 junctions during the Benhall Railway Bridge works, to alleviate SCC's concerns relating to road safety. Whilst this would not be included in the DCO as necessary mitigation, this could be implemented with agreement of the Local Highway Authority outside of the Order Limits.	
3.1.3	**Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** **Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-030]** **Application Document 6.3.2.1.C ES**	Proposed River Fromus Crossing	See A1.2 [REP2-062] and Chapter 5 [REP1-130] for further details. The Council considers the construction of a - permanent bridge of up to 6 metres in height across the River Fromus to provide access to the converter station to be a disproportionate response, particularly given the limited consideration of temporary alternatives. The proximity and scale of the structure would result in permanent loss of woodland and significant adverse effects on the landscape character and the setting of the Grade II Listed Hurts Hall and Grade II* Listed St John the Baptist Church in Saxmundham. The Suffolk Coastal Sensitivity Assessment (2018) identifies the setting of the crossing as sensitive, noting its role in the rural approach to Saxmundham and its contribution to the Fromus valley landscape. Vegetation removal required for the bridge would open views towards the converter station site, intensifying visual impacts. The proposals would also adversely affect The Layers, a non-designated Heritage Asset referenced in the Saxmundham Neighbourhood Plan and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 of the Suffolk Coastal Local Plan (2020). Significant impacts are also expected on important public	A detailed response to concerns on the proposed River Fromus crossing were addressed within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** at 10-13 within Table 2.2 (SCC-Significant Issues). This noted the ongoing engagement with SCC (and other stakeholders) which has continued through the examination period and resulted in the updates to **Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-030]**. The significant adverse effect reported for LCA B4: Fromus Valley is considered to reduce to non-significant at operation year 15 once proposed mitigation planting has matured (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**). The native woodland planting which would permanently replace the willow plantation would help integrate the bridge into the landscape, provide a large	Not Agreed

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	Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] **Application Document 9.48 River Fromus Visualisations Parts 1 – 3 [REP1-298, REP1-299 and REP1-300]** **Application Document Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-184]** **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7		views from the B1121 and The Layers (Views 1a, 1b, and 2 in the Saxmundham Neighbourhood Plan, 2023). The Council welcomes the revised layout avoiding veteran trees on the eastern bank; however, this modification increases the prominence of the bridge and access road in views from the south of the Conservation Area, the Church of St John the Baptist, and Hurts Hall. SCC is not persuaded that the adverse effects of the crossing would reduce to 'minor adverse' after 15 years, particularly if a 6-metre clearance is required. Should the proposed access route for the converter station be pursued, the feasibility of a temporary bridge should be fully explored in the first instance to minimise harm. The Council maintains that a permanent bridge is unnecessary and disproportionate (see paragraphs 5.72–5.77 of [REP1-130] and the Council's Deadline 2 responses [REP2-062]). If a permanent bridge is ultimately required, its design must be of exceptional quality, integrate sensitively within the landscape, and deliver tangible benefits for the host community, such as enabling public right-of-way use.	area of native woodland planting in the Fromus valley landscape and within the approach to Saxmundham from the south as well as creating new green infrastructure links. This is demonstrated within the illustrative visualisations prepared as shown in **Application Document 9.48 River Fromus Visualisations Parts 1 – 3 [REP1-298, REP1-299 and REP1-300]**. The Applicant disagrees that vegetation removal would open up views towards the converter station site and ESC in **Application Document Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-184]** has now agreed with the Applicant that vegetation removal along the Fromus will not open up views to the converter station to any significant extent, as noted in Annex 1 of **Application Document Updated versions of principal areas of disagreement summary statements (PADSS) [REP5-184]**. As set out within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** the Suffolk Coastal Sensitivity Assessment (2018) has formed the baseline of the landscape assessment contained within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]**. Further information on 'The Layers' has been provided by the Applicant in Table 2.3 of **Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP2-014]**. A permissive access route from the B1121 along the permanent access road, connecting to the diverted PRoW and permissive paths within the landscape planting around the Saxmundham Converter Station has been proposed and is included within **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7.Should a temporary bridge be used instead of a permanent bridge the footprint of the bridge plus the construction area to install the temporary structure would need to be retained clear of significant vegetation. This overall footprint would be greater than the permanent bridge footprint including maintenance access associated with the permanent structure. The construction impacts identified for the permanent bridge would occur each and every time that the bridge was	

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				required. Vegetation clearance, construction over the river, construction traffic through Saxmundham, additional construction vehicle movements and additional materials would be required to construct a temporary bridge each time. The impact on programme for maintenance activities would be significant with the construction of the compound and installation of the bridge in many scenarios representing the majority of the maintenance activity programme increasing associated disruption. Under a temporary bridge scenario, the works may not be able to be programmed sensitively as an emergency driver for maintenance may mean that the works associated with a temporary bridge installation may be more onerous in the future than those planned for the permanent bridge works.	
			The Council recognises that, at Deadline 4, the Applicant proposes for there to be a permissive route along the access route to the converter station site. The Council considers this to be an improvement to the application. Details of how this will be implemented, such as in terms of managing pedestrian safety, should be secured in the REAC and relevant outline management plans, such as the outline PRoW management plan. SCC provided feedback on commitment GG43 to the Applicant in advance of Deadline 7.This matter is covered in further detail in Table 3.16 of this document.	Commitment GG43 was included in Section 1 of **Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]** and therefore subject to Requirement 5. This commitment has been further updated in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7, amended in response to SCC's response to 3SERT3 in the 3rd Written Questions: "*A permissive path will be created along the permanent access road into the Saxmundham Converter Station as shown indicatively on sheet 1 of 7 of the Access, Rights of Way and Public Rights of Navigation Plans (Application document 2.7.1).* *The path will be opened for public access once the construction of the LionLink Converter station is complete at which point the permissive path will be in place for the life of the development, except where National Grid Electricity Transmission or National Grid Ventures requires a closure for maintenance purposes.* *Should the construction of LionLink be delayed such that construction at Saxmundham Converter Station for Sea Link is complete before construction has started on the Converter Station for LionLink, the permissive path would be open on completion of the Sea Link works and then closed for safety reasons for the duration of the LionLink construction works.* *The path will run from the access off the B1121, across the Fromus Bridge, to where it intersects with the*	Agreed

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				westernmost section of the permanently diverted E-491/005/0. *Opportunities will be sought to extend the permissive path from the point of intersection with E-491/005/0 through the woodland planting north of the converter station to connect into the reinstated PRoW E-491/006/0.* *The permissive path will be accessible to pedestrians and mobility scooter users only due to the route over the Fromus bridge not being suitable for cyclists and horse riders.* *The permissive path will meet local highway authority specifications for signing and surfacing. The surfacing will be fit for public use, ensuring paths remain open and unobstructed. The surfacing will be suitable for user types including pedestrians and mobility scooters. Any gates will be accessibility friendly, and fencing will be set back at least 0.5 m and hedges and trees set back 2m.* *The permissive path will be located between the access road and the boundary planting except for where is crosses the Fromus bridge, where a pedestrian section of the bridge would be segregated using markings and/or tactile paving and/or delineation strips..* *The permissive path would only be temporarily closed when major maintenance is required for either the Saxmundham or LionLink Converter stations (should the LionLink DCO be granted), when large loads may need to be delivered, or else where maintenance of the access road and associated vegetation is required. During any other periods of high activity on the haul road, when safety may be a concern, barriers and or path marshals would be provided.*"	
			Although the design of the bridge is predominantly a district function, the Council supports the district's requirement that there be an appropriate consenting mechanism to ensure the design of the bridge is appropriate for its setting. The Council submitted joint wording for a DCO requirement at deadline 4 in conjunction with the other Councils in response to Action Point 115 of ISH2 [REP4-150]. However, it should be noted that the Councils consider that more detailed design parameters should be produced to ensure that there is confidence that best design will be sought within the constraints of functionality of the infrastructure. The Council considers progress has been made on Requirement 3 in relation to the Fromus Bridge through correspondence with the Applicant prior to Deadline 7. This includes the design requiring full	The Applicant welcomes the productive discussions that have been held between the parties on the design of the bridge during the Examination and how the future design will evolve in collaboration with SCC. Following these discussions the Applicant has: • Amended Requirement 3(3)c so that the approval of the bridge applies to the 'design, layout, scale and external appearance' rather than 'design'. • Explicitly named SCC as a consultee in Requirement 3(3)c.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			approval from the relevant planning authority and reference to the EN-1 requirements for good design. SCC understands that Requirement 3, and the Key Design Principles are due to be updated according to SCC's requests, including in terms of providing commitments on engagement and independent design review which will ensure the relevant local authorities and a design review panel are able to shape the design throughout the design process to ensure good design is achieved as far as possible. If these changes are incorporated into the application at Deadline 7, SCC is content for this item to be considered resolved from the Council's perspective. SCC considers that ESC's view on this matter should also be sought by the Applicant to see if any further changes are required for ESC's agreement.	• Added reference to good design in paragraph 3(3)c and NPS EN-1. • Added reference to Key Design Principles on the Fromus Bridge (this amendment has been made in the version submitted between Deadline 7 and the close of Examination). • Update to the Key Design Principles to add in principles for the Fromus bridge, including principles discussed with SCC on engagement with SCC prior to submission of information to discharge 3(3) c, requirement for involvement of the independent design review panel and putting references to information to be submitted in the design principles rather than requirement to be consistent with other aspects of the design requirement.	

Table 3.2 Converter Station Site

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.2.1	**N/A**	Design – Building and landscaping masterplan	Concerns exist regarding the Applicant's approach to design regarding the Converter Station and associated landscaping of the site. A clear vision for the whole of the project is essential, but currently the lack of detail provided during pre-application is a cause of concern. Considering the scale of the development in a rural setting, good design for the converter station site is essential to mitigate the visual impacts of this and future schemes which may be accommodated on the converter station site. The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils. The Applicant has engaged with the Suffolk Design Review Panel (DRP) regarding the Master planning of the site; however, it is felt there was a missed opportunity for the Applicant to publish the DRP feedback to demonstrate transparency and contribute to building public confidence in the project. The Council recommends that a DRP process is undertaken post-consent to finalise the design. There must be provision for an adequate consenting mechanism for the approval for the final design. The Council submitted joint wording for a	The Applicant is and has always been committed to delivery of good design at Saxmundham Converter Station as demonstrated by the work completed on the Design Approach Document and Design Principles prior to submission of the Application and engagement with parties on design throughout the process. In the Applicant's view, discussions between the parties have not been identifying issues with the design per se, but with the approvals processes for the design to happen after a decision is made on the Application. The tension has been between the Applicant's critical need to plan an efficient construction programme and SCC's (and ESC's) desire for high levels of staged approvals and control; rather than any issue from either side on the principles of delivering good design and collaborative working.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			DCO requirement at Deadline 4 in conjunction with the other Councils in response to Action Point 115 of ISH2 [REP4-150] with updated wording provided at Deadline 6 [REP6-237]. SCC considers progress has been made on Requirement 3 in relation to the converter station through correspondence with the Applicant prior to Deadline 7. SCC understands that Requirement 3, and the Key Design Principles are due to be updated according to SCC's requests, including in terms of providing commitments on engagement, independent design review and a commitment to provide a technical statement demonstrating how the design principles have been met. Whilst SCC raised concerns with changes to the Key Design Principles at Deadline 6, as detailed in the list below, it is recognised that the change to the requirement wording to secure full approval of the final design by the relevant planning authority means that certain commitments may not be appropriate as drafted prior to Deadline 6. SCC would ask that the decision maker considers the Applicant's changes to the Key Design Principles at Deadline 6 to weaken certain commitments is necessary. However, provided that the changes requested by SCC are made at Deadline 7, this issue is not considered to cause this item to be "not agreed". The changes to the Key Design Principles made at Deadline 6 which may be of concern includes: • CO.3 - change from "will demonstrate how impact has been minimised" to " demonstrated how ... have sought to minimise...", • ID.3 - addition of "...that seek to exploit..." • ID.4 - addition of "the design will seek to locate..." twice • PS.2 - addition of "...will be followed where appropriate" • Change of "feasible" or "possible" to "appropriate" in several principles such as R.1, R.2 and R.3 Robust design principles are essential to ensure good design is achieved, as required in section 4.7 of EN-1.. The Applicant has provided little detail around the final design and wishes to retain a high degree of flexibility at this stage. The Council does not object with the principle of this approach but requires greater confidence that the design principles will serve as meaningful controls and a robust design process will be followed post-consent which is both integrated with the delivery programme and coordinated with Lion Link. SCC understands that updates at Deadline 7 are being made to the draft DCO and the Key Design Principles to secure this. Provided that these changes adequately address these concerns, SCC considers this matter "agreed".	To reach a compromise, the Applicant has made significant concessions on design, including most recently: • Amended Requirement 3(1) on the Suffolk Converter Station to include *'scale and external appearance'* of the converter station rather than just design. • Adding in a requirement for the design of the converter stations to be reviewed by an independent design review panel prior to submission of information. • Added in a Key Design Principle on the converter stations on consultation, specifying the need for a design meeting including Parish Councils before submission of information. • Adding in an explicit requirement for the Applicant to demonstrate compliance with key design principles and explain consultation carried out when submitting information to discharge requirement 3(1). • Committing to further work on design, including colour analysis. The changes made to the wording of the Key Design Principles were necessary because the wording of the DCO has changed from 'general accordance' to 'accordance' or 'substantially in accordance' (depending on the part of the DCO being reviewed) giving the key design principles different status. Originally the key design principles were not intended to be secured at all, and were not written for that purpose, but this approach evolved shortly before submission of the Application and further during Examination. The wording has been amended to ensure the Applicant has the flexibility required to develop the major infrastructure project and to ensure descriptions align with the final description of works in requirements (e.g. references to buildings rather than the whole converter station given the lack of flexibility over external equipment within the substation). 'Where feasible..' for example, implies that something should be done regardless of the impacts on other aspects of the environment, cost, practicality, programme and so on; whereas 'where appropriate' provides more flexibility for the design to be considered holistically and the best decisions taken in consultation with ESC, SCC, the independent design review panel and Parish Council representatives. This is important	

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				because the principles often relate narrowly to a single aspect of the building design. For example, on ID.4, equipment should not be 'hidden' (and visual consideration) at the expense of sensible electrical or drainage design, safety, any noise impacts etc. This could happen if this is required if equipment should be hidden if 'feasible'. It also may be that building equipment is in a 'prominent area' but actually better screened from sensitive receptors once landscaping matures, meaning the best landscape and visual outcome might not be strict accordance with the principle. This precise wording is important given the change in how firmly the principles are secured and the flexibility is considered beneficial for all parties.	
3.2.2	**Application Document 9.17.1 Suffolk Drainage Strategy [REP3-060]** **Application Document 9.17.1 Suffolk Drainage Strategy [REP5-083]**, **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7	Surface water drainage and flood risk	See Chapter 8 [REP1-130] for further details. Surface water drainage and flood risk at the converter station site needs to be comprehensively assessed and managed due to the topography and potentially poor infiltration properties of the Ancient Estate Claylands. Sufficient land should be included within the Order Limits to accommodate drainage for the site during construction and operation. Ongoing discussions required with the Council as the Local Lead Flood Authority (LLFA). The Council welcomes the addition of the requirement for a Drainage Management Plan to be submitted and approved which must be substantially in accordance with the outline plan. SCC set out its outstanding issues with the outline plan at Deadline 4 in response to Action Point 81 of ISH2 [REP4-150]. Since Deadline 4, the Council has met with the Applicant to discuss these matters and updates to the outline Drainage Strategy have been made which resolve the Council's concerns in relation to the permanent works on the site. Concerns remain around the temporary works by the B1121 for which SCC is in conversation with the EA and NGET to resolve. This drainage solution is within Flood Zone 3 and so must not increase flood risk which is not currently the case. The solution provided by the Applicant as of Deadline 6 is therefore inadequate. SCC understands that the Applicant is exploring alternative drainage solutions outside Flood Zone 3. SCC will continue to engage with the EA and the Applicant to resolve this matter after the close of examination but cannot consider this matter resolved at this stage. SCC has proposed requirement wording to ensure that this matter is resolved, since the outline drainage plan – Suffolk still shows the drainage solution being unacceptable and located in Flood Zone 3.	The Applicant met with SSC LLFA on 12 February 2026 to discuss their comments on the version of **Application Document 9.17.1 Suffolk Drainage Strategy [REP3-060]** that was submitted at Deadline 3 (Version A). The Applicant subsequently updated the Drainage Strategy and submitted this version (Version B) at Deadline 5 (**Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083]**), addressing the LLFA's concerns. The Applicant has submitted an updated version (Version C) of **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, at Deadline 7. During the meeting on the 12 February 2026, the proposed permanent attenuation pond at the converter station and the associated outfall were discussed confirming to SCC LLFA that the poor infiltration properties of the area had been fully taken into account within the design. The LLFA requested further typical details on the drainage ponds proposed which the Applicant submitted within the revised **Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083]**. On 30 April 2026 the Applicant provided further information to SCC LLFA defining the alternative drainage solution, clarifing that this linear solution (replacing a temporary basin in Flood Zone 3), would be located in Flood Zone 1, with the exception of a small diameter outfall to the receiving watercourse.	Not Agreed

Table 3.3 DCO Order Limits

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.3.1	**Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101]** **Application Document 9.89 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 (ISH2) [REP4-085]** **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**	Insufficient land for mitigation within Order Limits	See A1.3 of [REP2-062] for further details. Concerns over reductions applied to the Order Limits over the pre-application stage has limited the Applicant's ability to provide effective mitigation for areas including landscaping, visual amenity, enhancement and diversions of public rights of way. Examples include the Converter station site and alongside the B1119 to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users (NMUs). There is also concern that further opportunities for mitigation planting have not been implemented due to lack of provision within the Order Limits for further mitigation/offsetting, which SCC considers is required by the mitigation hierarchy given the significant residual effects. Appendix A to SCC's responses to ISH 3 Action Points displays where further planting could be achieved both inside and outside the Order Limits. The parcel of land in the northern part of the site which is excluded from the Order Limits could also have served to provide further mitigation planting. In addition, the Council is concerned that, whilst the Order Limits are proposed to be extended to incorporate the Benhall Bridge, the extent of land included does not provide sufficient flexibility to embrace all potential solutions, including the option of installing a replacement bridge, parallel to the existing bridge, so minimising the disruption to traffic movements during its provision. Whilst the Council welcomes the increase in the Order Limits along the B1119 for mitigation, concerns remain over the lack of provision in the Order Limits for new public rights of way in this area and whether the increase in the order limits is enough for the proposed mitigation works. The rest of the Council's concerns are not addressed or affected by the change request.	The draft Order Limits were refined in the normal way throughout the pre-application stages of the Proposed Project taking account of consultation feedback, assessment work, and design development. The land included within the Order Limits at the point of submission is adequate to allow the provision of all necessary mitigation and enhancement and has been identified following robust consideration of potential effects. The field to the north of the converter station does not fall within the Order Limits because this land is unnecessary to deliver or mitigate the Proposed Project. An earlier iteration of the design that was consulted on previously did include this land, but that was in order to seek views on the strategy for coordinating with National Grid Ventures' LionLink project. The coordination strategy has moved on significantly since that time and does not require the Applicant to acquire or develop on the field north of the converter station. Land along the River Fromus is included within the Order Limits for the purposes of mitigation planting of various types. The Applicant has not included land for a parallel replacement bridge adjacent to the Benhall Rail Bridge because this would be unnecessary (see **Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101]**), possibly unfeasible, and may result in avoidable impacts. The methodologies for crossing the Benhall Rail Bridge with AILs that are proposed by the Applicant are entirely deliverable and standard practice for projects of this nature. The provision of additional mitigation planting is set out with respect to specific viewpoints discussed within ISH2 within **Application Document 9.89 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 (ISH2) [REP4-085]** and relating to AP39 and AP40 within **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. The widening of the Order Limits associated with Change Request 1 has provided the opportunity to incorporate additional planting within the Order Limits along part of the B1119 following stakeholder requests. The 8.5 m depth of woodland planting is considered to represent an addition to the layered vegetation network of the surrounding landscape and is	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				comparable in width to other belts of planting in the local landscape. The delivery of a new permanent PROW along the B1119 is not required as mitigation and would not comprise a compensation measure due in part to the spatial and temporal separation between it and the only affected PROW (Bridleway 491/010/0). Instead, the Applicant is proposing various different enhancement measures comprising permissive access through the landscaping in this area.	
3.3.2	**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]**	Friston substation site – Differences between Sea Link and SPR proposals	The Applicant Order Limits regarding the Friston Substation site do not match those consented by SPR. Areas of land set aside for landscape mitigation and diversion of public rights of way have not been included. The Council mitigation secured under the SPR consent of the substation was considered necessary and so should also be considered necessary for the Applicant's consent of that same substation. Therefore, SCC considers the lack of a permanent diverted PRoW, and the inferior provision of mitigation planting along the track leading west from Grove Road at the north-east of the site to be unacceptable. The Applicant needs to provide evidence that the Order Limits proposed around Friston substation is appropriate to accommodate mitigation for Sea Link, considering the mitigations already secured by the SPR consents. The Council is not satisfied that the landscape mitigation plans proposed for Sea Link are sufficient when considering what was considered for the SPR DCOs. It's not clear that the Order Limits include enough space for the mitigation which the Council considers necessary. The main concern with the proposals is the proposed hedge row north of the site (leading west from Grove Road) as shown in Figure 5 of the outline LEMP [REP6-078]. This falls considerably short of the SPR proposals and requires to be further strengthened within the possibilities of the Sea Link DCO boundary, which SCC acknowledges, is smaller in this location than that of SPR. Nevertheless, robust screening to the north is required in this location. SCC would welcome, if a tree belt could be included here (three lines of staggered trees and understorey). If there is insufficient space, then a double hedgerow (either side of the track) with densely staggered hedgerow trees should be considered as the minimum.	The Applicant has extensively explained why the Order limits for the three projects (that only overlap for a small component of both projects) are different; and the Order Limits are demonstrably sufficient to deliver the required mitigation. For Friston Scenario 2 the Applicant at Deadline 4 updated Figure 5 of the oLEMP (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065])** which reflects SPR's discharged Onshore Substation Landscape Masterplan (February 2026). As explained in response to 3LVIA6 (**Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111**], the Proposed Project's Order Limits were developed based on SPR's OLEMS which in the area in question (between Little Moor Farm and Grove Road) showed a woodland belt to the immediate south of the PRoW. Consequently Figure 5 of the oLEMP, reflects a hedgerow to the south of the PRoW (consistent with SPR's consented detailed landscape design) but not the woodland belt to the north of the PRoW as this falls outside the Proposed Project's Order Limits, for the reasons set out above. To address SCC concerns, the Applicant has updated the oLEMP at Deadline 7 in section 5.7 to explain for Friston Scenario 2, '*supplementary planting to the south of the PRoW east of Little Moor Farm could be incorporated, subject to the outcome of the detailed design, undertaken pursuant to the oLEMP and in consultation with the relevant authorities*'.	Not Agreed

Table 3.4 Development Consent Order

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.4.1	**Application Document 7.5.3 (E) Outline Construction Environmental Management Plan [REP6-074]**, submitted at Deadline 7 **Application Document 9.83 (B) Outline Code of Construction Practice [REP4-232]**	Core Working Hours – Inclusion of Sundays and Public Holidays 7am-5pm	See Chapters 13-15 [REP1-130] and A1.4 of [REP2-062] for further details. The Council regards the inclusion of core working hours which spans seven days a week and Public Holidays as unacceptable due to the lack of respite for local residents from the impacts associated with construction activities including disruption to local roads and public rights of way (PRoW) used for recreational activities at a time when they are most frequently used. Regarding the potential delivery of the substation in Friston under the Sea Link DCO, the Applicant has not committed to undertake construction under the working hours agreed under the SPR consent which does not include Public Holiday and Sunday working. The Council requires the Applicant to align their working hours with SPR's consented schemes, which removes Saturday afternoons, Sundays and Public Holidays from the core working hours. The Council recognises that the Applicant has removed Bank Holiday working from the Core Working Hours. However, this does not address the Council's concerns of a lack of respite due to the infrequency of Bank Holidays. Therefore, this concern remains outstanding. SCC provided proposed wording for the core working hours in 15.47 to 15.56 of [REP1-130] which was updated at Deadline 6 [REP6-237].	The core working hours proposed are required in order to facilitate the delivery of this critical nationally important electricity transmission infrastructure. There are robust controls in management documents including in **Application Document 7.5.3 (E) Outline Construction Environmental Management Plan [REP6-074]**, submitted at Deadline 7 and **Application Document 9.83 (B) Outline Code of Construction Practice [REP4-232]** that mitigate the effects of construction activity, and there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends in any case. These measures, combined with the removal of bank holiday weekends, support the position that the proposed core working hours (including weekends where necessary) are reasonable and justified. The Applicant has aligned the working hours for Works 1A and 1B (which largely align with the works being undertaken pursuant to the extant SPR East Anglia TWO DCO at Friston, recognising that the works are numbered differently) to those secured in the SPR DCO.	Not Agreed
3.4.2	**N/A**	Outline Management Plans	Outstanding concerns over the adequacy of outline management plans and mitigation commitments can be found in SCC's previous submissions such as paragraphs 15.42-15.45 [REP1-130] and [REP2-062]. The Council expects a two-stage approach where Management Plans are submitted in accordance with Outline Management Plans for each phase of the development. Particular plans of concern which lacked an outline secured in Requirement 6 were the Drainage Strategy and the Materials and Waste Plan. The DCO has been updated secure outline plans for in Requirement 6 for these two plans which is welcomed by SCC. Whilst SCC also desires a two stage approach to the Skills, Supply Chain and Employment Plan, the plan submitted by the Applicant is not suitable to become a certified document and so the requirement wording proposed by SCC at Deadline 6 [REP6-237] should be used instead. The Applicant's position is that the submitted plan should be considered a final plan which is contrary to SCC's position and so this matter remains outstanding.. The details and control commitments the Council expects within the application's certified control documents in Schedule 3 are detailed in the Council's previous submissions, including [REP1-130], [REP3-101], [REP3-122], [REP4-150] and [REP2-062]. Many of the requested changes relate to SCC's principal issues detailed elsewhere in this document; however, SCC has also relayed concerns regarding particular	The Applicant welcomes the areas in which positive progress has been made and would emphasise the significant work that has been undertaken to develop and submit a Drainage Strategy, Materials and Waste Plan and Skills, Supply Chain and Employment Plan during the Examination. The Skills, Supply Chain and Employment Plan in particular was developed with involvement of the appointed contractors on the Proposed Project and is robust. It was also developed and informed by meetings with all five local planning authorities, with meetings and sharing of draft plans during the Examination. Given that the opportunities for skills, supply chain and employment on the Proposed Project are focused on the construction period the focus is solely on the construction benefits and it is highly relevant what stage the project is at on appointing contractors. This is very different to a project like Sizewell C, for example, where there are significant opportunities for employment during the operational period. On the Proposed Project, the contractors have already been appointed, the project team are at the stage now when a final plan would normally be produced in	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			wording. The details of outline management plans are crucial given that they form the basis of subsequent Discharge of Requirement approvals. Certain issues stated in SCC's previous submissions have been progressed although many outstanding concerns remain. Meetings on Highways, Water Environment, Landscape and Ecology matters have occurred with some positive changes being made. However, several issues remain outstanding regarding the outline LEMP, CTMTP, PRoWMP among others which are detailed in the relevant tables covering technical matters in this document.	construction terms. Many of the measures discussed and agreed with local authorities during production of the plan have already been implemented or are being implemented by contractors and this position will be further cemented by the time a decision is made on the Application. This is very different to many infrastructure projects where contractors might not be appointed until after consent and a two stage process may make more sense given things can evolve after contractors are involved. A final stage of the plan would likely involve submission of a plan that looks the same as the current plan, wasting valuable time and resources at LPAs and the Applicant's team; and leading to potential disagreements as discussions are reopened that were had before submission of the plan where LPAs requested things that the Applicant cannot agree to given contracts have already been signed. NPS EN-1 paragraph 5.13.12 states that the Secretary of State 'may' require a plan like the Skills, Supply Chain and Employment Plan. It is not considered a *necessary* document for the Proposed Project. This is because in comparison to projects with longer construction periods and operational employment opportunities, the opportunities are more immediate and short term. The document is not required for the application of the mitigation hierarchy, but to maximise the benefits of the Proposed Project. Given the very urgent and critical nature of the programme, potentially delaying start of construction on all elements of the Proposed Project for an unnecessary document approval does not meet the tests for requirements as set out in NPS EN-1 paragraph 4.1.16.	
3.4.3 **N/A**		Which consent will be used to construct substation at Friston (SPR or Sea Link)	The Applicant has yet to specify whether they would use their own DCO (if consented) or the SPR consent to build the substation at Friston. It is noted that there are discrepancies between the respective DCOs including the order limits and mitigation. SCC has requested that the Applicant must clarify that they plan to align with the SPR consent for the delivery of the substation in Friston and that this should be secured on the face of the Order. The Council recognises that there have been changes to the DCO to better align the substation with the SPR consent. However, these changes do not go far enough to remedy the concerns raised by the Council in terms of the Sea Link DCO's weaker controls and mitigation. SCC has submitted a document at Deadline 5 detailing how the DCO should be changed to achieve a necessary level of alignment between the consents. These requests recognise that it is unnecessary for the consents to be identical in terms of mitigation due to the differences in the number of substations being consented in the Sea Link DCO being only one. Therefore, the Council has taken a proportionate approach in its	Extensive discussions have been held between the parties on this matter. Friston Substation is the means to which the Proposed Project connects to the transmission network and an essential part of the Proposed Project. The Applicant does not have the powers to build under the SPR consents, nor will it *necessarily* have all powers when construction commences. The Applicant has no control over the process to discharge requirements on the SPR project, nor any ability to amend details on SPR consents should that be necessary. The only scenario under which Friston Substation would be constructed under the Proposed Project DCO would be if SPR stops construction of EA1N and EA2 for any reason. In this instance, it is considered *likely* that some changes, even if minor, might be made to the substation, particularly if the projects were permanently halted such that the wind farms are not connecting and the adjacent substations are	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			proposed changes to secure the necessary level of alignment in the wording of the DCO. Issues of alignment outside of the wording of the DCO, such as mitigation measures secured in outline management plans, are detailed elsewhere such as in SCC's ISH2 post-hearing submission [REP4-150] and corresponding oral submissions. Should these points be actioned by the Applicant to SCC's satisfaction, then this item would be considered resolves should scenario 2 remain within the application. However, the Applicant should seek to use the SPR consent and remove Scenario 2 from the DCO once it is clear that the substation will be built using the SPR consent. SCC understands that under the SPR consent, it is National Grid who will be constructing the substation. Once the works have commenced, SCC does not see why scenario 2 would nevertheless be necessary. The Applicant should either remove scenario 2 from the authorised development once this has occurred or otherwise commit to not constructing it under the Sea Link Order if it has already started construction under another consent. Requirement 15 should be reworded to reflect this commitment. SCC has proposed updated wording to Requirement 15 in response to the ExA's Rule 17 letter.	not constructed. Whilst this scenario is highly unlikely, the Proposed Project cannot be in a position where if this happened, it could not be completed. The Applicant needs to have the ability to complete construction of Friston Substation, not just start it. The wording of Requirement 15, however, does state that: *"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."*This requirement is considered an appropriate solution to manage SCC's concerns whilst ensuring the Applicant has the powers and consents to connect the Proposed Project to the transmission network in a way that is not reliant on a third party.	
3.4.4 **N/A**		DCO wording	See SCC's submissions, including Chapter 15 of [REP1-130], table B11 of [REP2-062], SCC's responses to ExQ1 [REP3-101] and Comments on Deadline 3 submissions [REP4-201] and subsequent submissions such as SCC's Deadline 6 schedule of changes for the DCO for the full detail of this issue. The Council is concerned by the lack of robustness within the DCO in various ways. This includes the wording of certain articles including 10, 11, 13, 18, 51, 52 and certain requirements protective provisions for highways, inadequate process for discharging requirements in Schedule 4 and insufficient provision to ensure adverse effects are minimised and effects do not exceed those assessed. SCC proposed drafting to change certain provisions of the DCO in [REP6-237] with updated drafting on some of these items, such as for Requirement 15, Tourism Monitoring Plan and Health and Wellbeing Monitoring Plan, provided at Deadline 7. The Applicant should consider the drafting changes proposed by SCC and seek to engage with the Council to reach agreement as far as possible. The Applicant has made certain changes endorsed by SCC such as for parts of Requirement 3, the addition of a requirement for a Reinstatement Planting Plan and the addition of an Emergency Planning Requirement based on SCC's proposed wording in [REP6-237]. However, many concerns raised over Schedules 3 and 4 remain outstanding. The Applicant has indicated that it is not willing to change these parts of the DCO according to SCC's requests.	The Applicant will review the submissions listed for any outstanding drafting points but would welcome an indication from the Council over a specific list of matters which it considers are not dealt with. The Applicant has made changes throughout (and before) the examination process in response to comments made by the local authorities. Protective provisions in favour of the Highways Authorities are now included within Schedule 15 of the DCO. In respect of a table comprising details of the discharging authorities and any consultees, this is included within the explanatory memorandum and detail has been included within Requirement 6. The Applicant acknowledges that SCC raised points regarding Schedule 4, particularly around timescales. The Applicant has responded to these comments in previous submissions and remains of the view that the time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) 2024.	Not Agreed (recognising that changes made at Deadline 7 have resolved some points)

Table 3.5 Substation Site in Friston

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.5.1	**Application Document 9.17.1 Suffolk Drainage Strategy [REP3-060] [REP5-083]**	Surface water flood risk	See A4.1 of [REP2-062] and Chapter 8 [REP1-130] for further details. Friston is a particularly sensitive area in terms of surface water flood risk to downstream receptors and has been subject to flooding on multiple occasions. It is essential that appropriate land is included on site to accommodate an effective drainage solution. SCC set out its remaining outstanding concerns in response to AP85 of ISH 2 [REP4-150]. Since this submission, SCC has met with the Applicant and an updated Outline Drainage Strategy and additional information pertaining to the Flood Risk Assessment has been submitted. These updates resolve SCC's concerns in relation to the substation site.	The Applicant met with SSC LLFA on 12 February 2026 to discuss their comments on the **Application Document 9.17.1 Suffolk Drainage Strategy [REP3-060]** submitted at Deadline 3. The Applicant subsequently updated the Drainage Strategy and submitted the Drainage Strategy at Deadline 5 (**Application Document 9.17.1 (B)Suffolk Drainage Strategy [REP5-083]**), addressing the LLFA's concerns. Further comments were received from the LLFA on 30 March, which have been addressed within a final update to **Application Document 9.17.1 (C) Suffolk Drainage Strategy** submitted at Deadline 7. During the meeting on the 12 February 2026 the Applicant confirmed with SCC LLFA that the proposed drainage for the Suffolk Substation would mirror that proposed by SPR, including the full infiltration of the permanent runoff from the substation within an infiltration pond proposed to the southwest of the proposed substation.	Agreed
3.5.2	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Landscaping and Design	Concerns exist regarding the Applicant's approach to design regarding the Kiln Lane substation and associated landscaping of the site. Considering the scale of the development in a rural setting, good design and landscaping for the substation site under scenario 2 is essential to mitigate the visual impacts of this and future schemes which may be accommodated on the site. The consent sought by the Applicant should match the mitigation secured in the SPR consent for the substation. This includes not only mirroring landscape, design and drainage mitigation, but also the permanent diversion PRoW created by SPR to offset the permanent closure of the PRoW which runs through the substation site. The Applicant should be undertaking a participatory approach to design with the other NSIP promoters who will be accommodated on the site, alongside the statutory consultees, including the relevant town and parish councils. There should be a requirement for the design to be approved. The Council submitted joint wording for a DCO requirement at deadline 4 in conjunction with the other Councils in response to Action Point 115 of ISH2 [REP4-150]. Updated wording was provided by SCC at Deadline 6 [REP6-237]. The Council agrees with the approach of securing the approved documents submitted to discharge Requirement 12 of the EA2 DCO in the requirement governing design of the substation under Sea Link's DCO. However, SCC considers it necessary for all relevant information within those documents to control the Sea Link Friston substation. Any deviation from these documents should be controlled in the same way as Requirement 12 of the SPR consents to ensure the consents are	The Applicant at Deadline 4 updated Figure 5 of the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7) which reflects SPR's discharged Onshore Substation Landscape Masterplan (February 2026). As SCC is aware, extensive consultation has already been undertaken on the design of Friston Substation, with the Proposed Project team and National Grid more generally involved in both the design process and the consultation events. The detailed design of Friston Substation is nearing completion and the design details agreed in terms of the building have been incorporated into the Proposed Project DCO. However, it is not appropriate, necessary or enforceable to require an Applicant on one project to develop in accordance with documents controlled and submitted by another applicant on a different project. The documents submitted to discharge Requirement 12 include details that the Applicant cannot implement (e.g. planting over the Proposed Project cables and outside the Proposed Project Order limits); information not relevant for the Proposed Project (associated with the other substations, including mitigation of the impacts of those substations) and can be amended at any time by SPR, with the Applicant having no control over that process. As discussed above, the highly unlikely scenario that Friston Substation would be	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			consistent in their approach. SCC's updated wording submitted at Deadline 6 ensures all relevant design details from the discharged SPR documents are secured for the design of the substation under the Sea Link consent. SCC supports the ExA's proposed drafting of Requirement 3(2) which aligns with SCC's proposal within [REP6-237].	developed under the Proposed Project consent would only occur if there was a significant delay or cancellation of the SPR projects; in that event it would be wholly inappropriate for the Applicant to be tied to details submitted by SPR on the wind farm applications. Indeed, if the wind farms were not proceeding, this is highly likely to affect the design of the substation (at least in terms of equipment) and may mean a different approach to other elements is preferred. The Applicant would therefore need the ability to amend details, which it cannot on the SPR consents.	

Table 3.6 Coordination with Other NSIP Projects

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.6.1	**Application Document 7.10 Coordination Document [APP-363]** **Application Document 7.5.1.1 (F) Outline Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Lack of coordination and acknowledgement of cumulative effects of Sea Link alongside other NSIP projects.	The Council is deeply concerned regarding the apparent lack of meaningful discussion between Sea Link and other NSIP projects in the same locality, to find opportunities to coordinate activities to reduce the impact of construction (e.g. on the highway network) of multiple projects on host communities on the East Suffolk Coast. As a result, differing landfall and cable routes have been selected by separate projects which will increase the impacts of construction on the host communities, landscape, and ecology. The Council cannot stress enough the importance of NSIP promoters not considering the impacts of their schemes in isolation. Promoters must consider the impacts of their scheme in association with the timelines of the construction of other NSIP projects in geographic proximity and have meaningful discussions to develop strategies to minimise the impacts of multiple, successive NSIP schemes on host communities and the environment. Evidence should be produced demonstrating that the Applicant has done as much as could reasonably expected to coordinate and collaborate with developers of NSIPs in the vicinity, including by seeking to enter into formal collaboration agreements such as data sharing to facilitate future coordination and minimisation of adverse impacts. The Council does not consider that the application has achieved this. It is recognised that it may not be possible for coordination agreements and strategies to be formed between the relevant parties during the examination. In this case, the application should ensure that coordination is embedded in the relevant outline management plans such that the detail of coordination is finalised post-consent and	Close and meaningful coordination discussions with other projects and other promoters have been ongoing for several years and have had a profound influence on the development of the Proposed Project. The Applicant disagrees with SCC's ongoing statements to the contrary, which are incorrect. The approach to coordination is set out in **Application Document 7.10 Coordination Document [APP-363]**. The outcome of this ongoing coordination is evident throughout the Proposed Project, including the identification of Saxmundham as a co-located site for up to three converter station (a site selection process that SCC was itself involved in), and the various benefits and opportunities that this presents. The ongoing opportunities for coordination through delivery are in part embedded in the outline management plans, for example **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 which provides for a transport coordinator whose remit will specifically include coordinating with other NSIP developers: • Coordination is embedded in the Applicant's approach. In terms of the specific areas mentioned: Health and Wellbeing: the Applicant has included HW02 in the REAC, which commits to measures to reduce the potential for impacts on mental health and wellbeing,	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			submitted to the relevant planning authority. Areas where the Applicant should demonstrate coordination include: • Health and Wellbeing – coordinated governance, mitigation and monitoring. • Tourism and Accommodation – coordinated governance, mitigation and monitoring. • Socioeconomics – coordination via exchanging data and skills, supply chain and workforce activities and monitoring • Landscape and Visual – coordination with Lion Link in converter station site. • Coordinated laying of cable ducts. • Traffic and Transport – greater detail on involvement in SZC's Transport Review Group such as data sharing and mechanism for coordination with other projects. • Public Rights of Way – greater detail on how coordination will be achieved, including coordinated PRoW proposals for the converter station site with Lion Link. Commitments should be made to seek to join, or at least report to, existing governance structures of other projects, such as Sizewell C's governance groups, or seek to create a new forum in collaboration with the local authorities for undertakers of NSIPs in East Suffolk to seek to find opportunities for coordination. Whilst the Applicant has committed, in places, to look into joining existing governance groups organised by Sizewell C, the application lacks commitments for the scenario where the members of those groups do not consider them to be an appropriate forum for the undertakers of other projects, as they were originally designed solely for relevant stakeholders and Sizewell C, as per the Deed of Obligation between Sizewell C and the local authorities. Therefore, there is no guarantee that the existing members of the various working groups will allow Sea Link to join. It is therefore necessary for commitments to be made in the appropriate control documents that Sea Link will create, or at least seek to facilitate the creation of, appropriate working group(s) with the promoters of other NSIPs in East Suffolk and the local authorities to maximise coordination opportunities to minimise avoidable impacts and maximise the effectiveness of mitigation. Therefore, whilst SCC appreciates that the Applicant has made certain commitments which aim at achieving coordination, the commitments do not go far enough to give a greater level of certainty that coordination between the Applicant and NSIP developers in the region will be sought as far as reasonably possible.	including attending and contributing to the Sizewell Health and Wellbeing Working Group. No party has provided a robust suggestion of how mental health and wellbeing would be monitored or mitigated so any requirement on this would be unenforceable, as well as unnecessary given there are not predicted to be adverse significant effects on this topic. • Tourism and Accommodation: REAC commitment SE04 includes a commitment to working with existing working groups established through Sizewell C where possible, in addition to SCC, ESC, the DMO and LVEP. The Applicant has also committed to a strong commitment to not accommodating workers in tourism areas, going further on this than other applicants with far more potential for tourism impacts than those associated with a transmission project. The Applicant is of the view that significant compromises have been made on this, particularly given there are not predicted to be significant adverse effects on tourism via accommodation or otherwise. • Socioeconomics: **Application Document 9.120 Detailed Skills, Supply Chain and Employment Plan [REP6-101]** paragraph 7.3.10 states that communication with other NSIPs will be made where necessary to minimise any potential issues that may arise from the competition for workers, equipment and materials from other projects. The Plan also recognises that National Grid are already active members of Suffolk Chamber of Commerce and how this involves working with other developers. • Section 7.6 of the **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan -Suffolk**, submitted at Deadline 7 covers coordination with National Grid Ventures projects, including referencing the NGV Coordination Suffolk Masterplan (**Application Document 7.10.1**) and providing commitments to future coordination in the development of the final LEMP. It is considered that this has always been embedded in the design and evolving management plans for the site. • Traffic and Transport: **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 includes commitments to liaise with other developers (paragraph 7.6.5). Detail on liaison between developers can be expanded on during production of the final CTMTP and the Applicant is committed to	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				continuing to engage in multi-developer groups when invited to do so. A further commitment has also been added to the CTMTP to address SCC's comment on this stating: *'Further to the above, the Applicant will seek to participate in Traffic and Transport Working Groups set up by other Nationally Significant Infrastructure Project (NSIP) promoters in East Suffolk and the relevant local authorities where invited to do so.'* • **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]**: the Proposed Project impacts on public rights of way are limited, particularly for a project of this scale, and the cumulative effects are similarly very limited. No Public Rights of Way will be closed without diversions in place and most diversions are in place for short periods of time. The most significant interaction will be the interaction between the construction of Lionlink and the proposed new permissive paths at Saxmundham Converter Station, with liaison between the parties on these matters happening through the finalisation of both the LEMP and the PROWMP on the site which will be discharged through Requirement 6. In all areas, commitments on joint working can only ever be made in terms of seeking to work together because the Applicant has no power to force other developers to engage, work together or agree to joint action. The impacts of the Proposed Project are not comparable to those of Sizewell C and impacts, on the whole, a fraction of those of the larger project, giving the Applicant a very limited ability to influence cumulative effects. This context should be recognised when considering a proportionate and reasonable approach to requirements imposed on the Proposed Project. However, in the above context, the Applicant has been working extensively and collaboratively with all other NSIP developers from the outset of the Proposed Project and demonstrated this throughout the Examination process.	
3.6.2	**Application Document 7.10 Coordination Document [APP-363]**	Coordination with the National Grid Ventures (NGV) LionLink Scheme	Although the Converter Station site provides a colocation for both Sea Link and LionLink schemes, the Council feels that the Applicant could reduce the environmental and construction impacts of the scheme by laying additional ducts alongside those required for the Sea Link project (for example for High Voltage Alternating Current (HVAC) cabling between the converter station and the substation at Friston).	The Applicant cannot seek powers for works forming part of other future projects being progressed by other third-party developers for the reasons set out in **Application Document 7.10 Coordination Document [APP-363]**. However, the Applicant will continue to work closely with National Grid Ventures to consider opportunities for efficiencies in delivery, and (although less likely) co-	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			The Applicant should seek to coordinate the Sea Link construction compounds with LionLink (where works overlap) during construction of the converter station. The Council suggest that the Applicant includes the flexibility within the DCO to accommodate laying additional cable ducts for LionLink to reduce the impacts and disruption which would occur due to successive NSIP projects requiring to undertake cable installation in close proximity in both time and location. This could be secured in the DCO in an appropriately qualified way which does not add risk to the delivery of Sea Link but ensures coordination is maximised should Lion Link receive consent. Requirement 42 of the SPR DCOs could be worked into the Sea Link DCO such that the promoter will laying additional cable ducts for Lion Link should the works take place after Lion Link has received development consent where the cable routes of the two projects overlap. SCC has provided wording for such a requirement at Deadline 6 which means the Applicant must install cable ducts for Lion Link if that Order has been consented once the overlapping cable works are undertaken. SCC considers this to be a very small burden which will reduce future adverse effects and so provide contribution towards fulfilling the aims of national policy requiring coordination. The Council urges the Applicant to work with NGV to agree coordination of construction compounds to prevent unnecessary impacts of separate construction compounds. SCC has engaged with the Applicant on this matter and understands the Applicant's concerns with SCC's proposed requirement. SCC has provided updated wording in attempt to allay these concerns at Deadline 7 which restricts the requirements application only to where the Applicant gains the powers to install Lion Link's cable ducts. It should be noted that SCC has raised the need for coordination, including regarding coordinated cable duct laying with Lion Link, throughout its pre-application engagement with the Applicant. SCC considers that the Applicant should have sought to enter into an agreement with NGV whereby NGV would transfer powers to install Lion Link's cable ducts (where the two cable routes overlap) to NGET upon Lion Link gaining consent with suitable provisions for cost recovery to ensure this is not done at NGET's expense.	delivery of certain elements under the projects' respective powers. A requirement similar to Requirement 42 in the SPR DCOs would be wholly inappropriate and indeed unfeasible (again for the reasons set out in the Coordination Document referenced above). The Proposed Project is a nationally critical infrastructure project, the deliverability of which cannot be tied to the progress of another project being progressed by a different developer, over which the Applicant has no control.	
3.6.3	**Application Document 9.73.1 Applicant's responses to First Written Questions [REP3-069**]	Substation at Friston – Interaction of cable route with consented East Anglia One North and Two Planting	As currently designed, there is a considerable risk that the HVAC cable corridor route proposed to the substation at Friston could impact the landscape planting consented under East Anglia One North and Two. The Applicant needs to work with SPR to consider options to minimise the potential impacts of the proposed cable route into the Friston substation on the consented landscape planting for East Anglia One North and Two. In the first instance, the Council considers that HDD should be implemented to connect to the substation to avoid interfering with the	The currently consented detailed landscaping design was approved pursuant to Requirement 14(1) of the East Anglia TWO DCO by East Suffolk Council (ESC) in February 2026. The currently approved landscape design includes a greater degree of planting than required by Requirement 14 (noting that the Outline Landscape and Ecology Strategy, OLEMS, secured on the face of the SPR DCO is not itself incompatible with the Proposed Project). The	Not Agreed

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			landscape mitigation and PRoW proposed/delivered by SPR. If this is not feasible, and interaction with the SPR mitigations is unavoidable, the Applicant should consider implementing planting elsewhere to minimise the adverse effects of this interaction.	recently approved design will need to be updated to effectively coordinate with the Proposed Project. The means by which the detailed landscape design will be updated to accommodate the Proposed Project is via a resubmitted landscape design pursuant to Requirement 40 of the SPR DCO. The SPR Requirement 14(1) submission, and the ESC decision report, identifies this as the correct mechanism to update the design to accommodate the Proposed Project. The Applicant continues to engage with SPR to agree the approach to updating the landscaping design. There would be no need for planting elsewhere, because the landscape design to be submitted and discharged will be in accordance with SPR DCO Requirement 14(1) and therefore will effectively mitigate the effects of the East Anglia One North and TWO projects (noting that this mitigation planting is not to mitigate effects caused by the Proposed Project in the scenario where the Applicant substation is delivered under the East Anglia TWO DCO, as expected). An HDD solution under the landscaping would be unnecessary and unfeasible, including for reasons set out in **Application Document 9.73.1 Applicant's Responses to First Written Questions [REP3-069]**.	

Table 3.7 Cumulative Effects (Overarching Matters)

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.7.1	**Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]**	Environmental and Socio-economic impacts of cumulative developments in East Suffolk.	Detail on SCC's concerns can be found in its examination representations including [RR-5209], [REP1-130] and [REP2-062]. SCC has proposed specific mitigation measures in response to 2CEInter1 of ExQ2. The Council has significant concerns regarding the cumulative environmental and socio-economic impact of Sea Link alongside the construction of other NSIP projects in the area, including Lion Link, Sizewell C and those consented which will be delivered by SPR. Particular concerns exist around cumulative effects on traffic and transport, landscape, tourism, workforce, PRoWs and health and wellbeing including mental health.	The Applicant considers the assessment of inter-project cumulative effects to have been robust. The Applicant's position regarding SCCs mitigation proposals for inter-project cumulative effects is as set out below. Health and Wellbeing Please see the Applicant's response to 3HW3 in **Application Document 9.136 Applicant's Responses to Third Written Questions [REP6-111]**. Traffic and Transport	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			There is a need for a full worst-case scenario assessment of environmental and socio-economic cumulative effects of the project in conjunction with others taking place in East Suffolk. The comments made by the Council in its previous submissions should be addressed within the assessment. Notable concerns expressed by the Council include the application of inadequate assessments of the likely effects of the Sea Link project leading to potentially inaccurate conclusions of likely significant effects in the cumulative effects assessment, the robustness of the cumulative transport assessment and an apparent general underestimation of the magnitude of cumulative effects despite significant uncertainty of certain effects such as health and wellbeing and socio-economics and tourism. The Applicant should commit to appropriate and sufficient mitigation measures both alone and in conjunction with cumulative projects to adequately avoid and minimise adverse effects. SCC considers that there is significant uncertainty over the likely cumulative effects in multiple areas including Health and Wellbeing, Socioeconomics and Tourism and Traffic and Transport. As a result, SCC does not consider that there is enough evidence to suggest no mitigation is necessary. At least, robust monitoring measures should be implemented to detect how effects occur. SCC has proposed monitoring and mitigation measures in relation to cumulative impacts for the reasons summarised here and set out in detail in SCC's submissions (such as [REP1-130], [REP2-062], [REP5-204], [REP6-184], and [REP6-181]) which includes DCO wording provided at Deadline 6 [REP6-237] and updated at Deadline 7. SCC has engaged with the Applicant on these points and has not been able to reach agreement.	The Applicant has held further meetings with SCC Highways throughout Examination to review requests for additional mitigation, including a meeting most recently on 30 March 2026. **Application Document 7.5.1.1 (F) Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 has been updated multiple times during Examination to include additional measures where agreed. This includes the inclusion of daily HGV caps for localised parts of the highway network, including at the B1121/B1119 junction within Saxmundham. The Applicant has also carried out junction capacity modelling with the results reported within **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [REP6-038]** which was shared with SCC on 1 April 2026 (and then submitted at Deadline 6). Additional mitigation has subsequently been included within **Application Document 7.5.1.1 (F) Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 to manage construction workers using the A1094 Aldeburgh Road /B1069 Snape Road junction. The Applicant does not consider any further additional mitigation to be required from a traffic and transport perspective. Socio-economics and Tourism Please see the Applicant's response to 3SERT2 regarding monitoring of impacts on tourism and the visitor economy within **Application Document 9.136 Applicant's Responses to Third Written Question [REP6-111]**. The Applicant has also prepared **Application Document 9.120 Detailed Skills, Supply Chain and Employment Plan [REP6-101]** submitted at Deadline 6. Please also refer to the Applicant's response to 3SERT1 in relation to the Skills, Supply Chain and Employment Plan within **Application Document 9.136 Applicant's Responses to Third Written Question [REP6-111]**. Public Rights of Way The Applicant has committed to the series of additional mitigation measures requested by SCC which are now included in an update to **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** submitted at Deadline 6. With respect to other mitigation matters, see the Applicant's position as set out in Appendix D of **Application Document 9.136 Applicant's Responses to Third Written Questions**. Working Hours The core working hours proposed are required in order to facilitate the delivery of this critical nationally important electricity transmission infrastructure.	

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				There are robust controls in management documents including in **Application Document 7.5.3 (E) Outline Construction Environmental Management Plan**, submitted at Deadline 7 that mitigate the effects of construction activity, and there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends in any case. These measures, combined with the removal of bank holiday weekends, support the position that the proposed core working hours (including weekends where necessary) are reasonable and justified. The Applicant has aligned the working hours for Works 1A and 1B (which largely align with the works being undertaken pursuant to the extant SPR East Anglia TWO DCO at Friston, recognising that the works are numbered differently) to those secured in the SPR DCO.	
3.7.2	**N/A**	Intra Project Cumulative Effects	SCC considers that the synergy of effects within an area (e.g. the combined effects of individual PRoW receptors on the PRoW user, or combined Traffic and Transport effects on road users) should be considered. The range of effects on people when considering how they will experience effects from the project has not been sufficiently accounted for in the assessment. People and businesses in the local area will be affected on a daily basis and it does not follow, for example, that no significant effects on individual receptors means there will be no significant effects from a person's experience of adverse effects on various receptors during the construction period. The accumulation of experiences of minor adverse effects over multiple years could rise to the level of significance when, for instance, considering people's wellbeing. Whilst the Applicant has considered intra-project cumulative effects on health and wellbeing, little reasoning is given to justify its conclusion of no significant effects. The Applicant has not considered, for instance, how fear and intimidation, driver delay and safety can cause stress and adversely affect people's mental health. Add to this the industrialisation of a rural area affecting sense of place, disruption to the PRoW network, lack of respite from working hours, noise, vibration, air quality and the intense cumulative context, for instance. The review of the intra-project cumulative effects assessment must ensure that there is further assessment to capture the full scope of potentially significant effects. SCC has proposed mitigation via DCO wording which will, in part, mitigate or offset certain significant intra-project cumulative effects (as well as other effects as stated by SCC in Deadline 7 submissions). This includes the proposal for a financial contribution to provide PRoW improvement and creation. SCC considers that intra-project cumulative effects which have been identified as potentially significant must have appropriate mitigation or offsetting measures associated with them. For effects	The Applicant is confident that the assessment work undertaken in support of the application is robust. Where there is an unavoidable level of uncertainty with respect to intra-project cumulative effects, the Applicant has reported effects as significant as a precaution and has addressed this through updated and additional commitments including: *"GG40 Once detailed design is complete and detailed construction and programme information is available, the undertaker commits to undertaking a review of the intra-project cumulative effects assessment submitted with the application (as amended during the Examination) in collaboration with the relevant local authorities to consider:* *1) if the significant intra-project cumulative effects are still considered likely to occur; and* *2) if they are still considered likely to occur, what additional appropriate mitigation measures may be applied to reduce their significance; and* *3) if no such mitigation measures are available, what additional appropriate offsetting measures may be applied following the mitigation hierarchy.* *4) any such mitigation or offsetting measures must be agreed with the relevant local authorities, including a timetable for their implementation, and once agreed shall be implemented in accordance with the terms of such timetable."* *"GG27 - Members of the community and local businesses will be kept informed regularly of the works through active community liaison. This will include notification of noisy activities, heavy traffic periods and start and end dates of key phasing. A contact number will be provided which members of the public can use to raise any concerns or complaints about*	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			which have not been assessed as significant, but may turn out to be significant, the wording for a new requirement proposed by the ExA in its schedule of changes to the DCO based on SCC's wording given in response to 2CEIntra2 of ExQ2 [REP5-204] is supported by SCC. However, this wording may need an update to ensure the review of the assessment does not only cover effects already identified as potentially significant. For effects which have been identified as potentially significant in the Environmental Statement, SCC maintains that it is necessary for the application to include appropriate mitigation/offsetting measures. SCC understands that the Applicant's revised DCO at Deadline 7 includes a new requirement for Intra-project cumulative effects. SCC does not consider that this wording is adequate since the Applicant has removed reference to collaboration with local authorities and for measures to be agreed with local authorities. SCC considers that these things must be included to ensure adequate mitigation is implemented where needed and to ensure such mitigation is effective. In any case, there should be consistency between the REAC commitment and DCO wording, particularly in terms of local authority involvement which the Applicant omits from its proposed Deadline 7 DCO wording. This involvement is necessary on account of local authority expertise and close working relationships with promoters of cumulative NSIPs and so this involvement would benefit the Applicant in ensuring the assessment review and mitigation measures are robust.	*the Proposed Project. All construction-related complaints will be logged by the contractor(s) in a complaints register, together with a record of the responses given and actions taken. This will be made available to local authorities for review on request. Where comments or concerns are raised in relation to intra-project cumulative effects on the amenity of residential receptors, road users or PRoW users, the contractor will consider if there are proportionate and practicable measures that can be implemented to address the contributing impacts and seek to implement any such measures."* *"GG03 - The CEMP shall include measures to manage dust, waste, water, noise, vibration and soil during construction. The contractor(s) shall undertake daily site inspections to check conformance to the Management Plans. The title and contact number of person(s) accountable for issues relating to dust, waste, water, noise, vibration and soil will be displayed at site boundary. Should any concerns be raised about site emissions contributing to intra-project cumulative effects on the amenity of residential receptors, road users or PRoW users, these will be considered by the contractor, who will seek to implement measures to further mitigate the emissions contributing to the cumulative effects. A response will be provided either directly or through existing community liaison notifications."* *"NV03 - The contractor will conduct detailed construction noise and vibration assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors, including nocturnal protected species, and therefore whether additional measures, including site-specific Best Practicable Means (BPM), may be required. Should the reassessment of intra-project cumulative effects (see commitment GG40) indicate that significant effects are likely to occur, the contractor will consider if there are proportionate and practicable ways to reduce potential noise effects that contribute to any such effects to a greater degree than BPM. The contractor will update the OCNVMP into the CNVMP and include site specific noise and vibration mitigation, as may be required."* Specific comments raised by SCC on cumulative effects in terms of Health and Wellbeing, Socio-economics and Tourism and Traffic and Transport are covered in the topic tables within Section 3.2 of this SoCG.	
3.7.3	**Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Intra-Project Cumulative**	Methodology - Sequential impacts	The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRoW users, in addition to local residents and businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset	The Applicant notes the Council's concerns regarding sequential cumulative impacts arising from the Proposed Project. The Applicant has undertaken a comprehensive inter-project cumulative effects assessment in accordance with the PINS Advice on Cumulative Effects Assessment. The individual	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Effects [APP-059] **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]** **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7		this impact. The Applicant's assessment considers peak impacts on receptors at a given time; however, it does not appear to consider effects from repeated adverse impacts on the various assessed receptors over a prolonged period of time for people who will experience those impacts as a result of cumulative developments.	assessments have taken duration into account in line with the relevant topic-specific guidance. The mitigation proposed by the Applicant is considered to be sufficient to address the effects of the Proposed Project alone and together with other developments that are under construction within the same time period as the Proposed Project. It is not considered necessary or possible for the Applicant to deliver construction stage mitigation outside of its own construction period. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** reports the cumulative impacts of the Proposed Project in addition to other projects on shared receptors. It includes a sequential cumulative visual assessment for visual receptors, as reported in Table 13.36. The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore Windfarms have potential to result in cumulative effects upon four PRoW. The Applicant will co-ordinate PRoW closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment (GG32) included in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. A similar commitment is made to ensure coordination with National Grid Ventures in relation to LionLink. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative projects in aggregation with the Proposed Project, and therefore no additional mitigation will be required.	
3.7.4	**Application Document 6.3.1.5.A ES**	Methodology	The Council has critically reviewed the Applicant's cumulative effects assessments and has set out their shortcomings throughout its Local Impact Report and other representations.	The Applicant presented the cumulative assessment methodology on 20 November 2024, and this was agreed with the Consultee. The fact that the Consultee does not agree with	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091] **Application Document 9.35.1 Applicant's Comments on Local Impact Report [REP2-026]**		Outstanding issues with the methodology include: topic specific issues which are carried over to the CEA as this uses assessment conclusions from each relevant topic area. Lack of information justifying conclusions made using professional judgement. Optimistic assumptions over likely effects relating to Health and Wellbeing, PRoW and Socioeconomics and Tourism using professional judgement which doesn't concur with the worst-case scenario approach. Unjustified conclusions regarding cumulative effects of the A12 MRN scheme with this project. Unwarranted assumptions that cumulative developments won't overlap. Lack of use of most recent data for cumulative developments such as relying only on the Sizewell C ES and not more recent information which could have been sought from Sizewell C, or gathered from its published monitoring reports.	the findings of the CEA is a separate matter discussed elsewhere in this table The cumulative effects assessment methodology is set out in **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**. The Applicant responses to SCC comments on the CEA can be found in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. Carrying over topic specific issues into the cumulative effects assessment is central to the practice of cumulative effects assessment, so it is unclear how this can be considered as a criticism of the Applicant's approach. A worst-case scenario approach does not mean reporting everything that has any degree of uncertainty as significant. The Applicant does not rely on an assumption that cumulative developments will not overlap, just that all peak traffic days will not overlap. It is entirely appropriate and reasonable to use the published information from the SZC Environmental Statement, particularly given that the monitoring data represents what is happening now, and not what the situation will be at the point that the Proposed Project commences construction.	
3.7.5	**Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**	Methodology – Short list and Long list	The cumulative effects short list should be reviewed and updated should new information become available about upcoming projects which could interact with the Applicant's project. SCC recognises the updated long and short list in [REP6-098]. Although SCC disputes the assessment methodology and conclusions of additional projects carried out in this document such as the A12 MRN, it does not dispute the long and short list itself. The only project excluded from this list worthy of note is the Essex and Suffolk Water Pipeline project which showed routing options which go through Saxmundham, including the converter station site. However, SCC recognises that there is not enough available information at this stage to carry out a meaningful cumulative effects assessment. SCC considers that the Applicant should seek clarification from this promoter that its project will not interfere with the built infrastructure of Sea Link.	The long list and short list are provided within **Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** and **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**. The Applicant has considered 'other existing and, or approved development' that have come forward since the Cumulative Effects Assessment submitted with the application (including those recommended by the LPAs) was undertaken. This has considered the following: • Other existing and, or approved development not previously identified; • Other existing and, or approved development identified previously, but for which there is additional information (e.g. an Environmental Statement or Preliminary Environmental Information Report (PEIR)); and • Other existing and, or approved development included on the original long list that have been withdrawn or are no longer being progressed. The details of this assessment which includes an updated long list and short list are set out in **Application Document 9.110**	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098].	
3.7.6	**Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** **Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083]** **Application Document 6.2.5.2 (B) Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [REP1A-011]** **Application Document 6.2.4.11 (B) Part**	Conclusions and Mitigation	The Consultee is yet to agree with the conclusions set out in the Cumulative Effects Assessment (CEA). The Consultee has reviewed these conclusions in its LIR and subsequent submissions. SCC has outstanding concerns with the conclusions of the assessment in relation to Traffic and Transport, Health and Wellbeing, Socioeconomics and Tourism and Public Rights of Way. SCC considers that little evidence has been provided justifying the Applicant's conclusions of professional judgement which is particularly a concern when assessing total cumulative effects on Health and Wellbeing, Socioeconomics and Tourism and PRoW. SCC is therefore not convinced that the assessment conclusions are justified and considers that there remains potential for effects in these areas to be significant. At Deadline 6, SCC proposed mitigation measures to be secured in the DCO to ensure there is a mechanism for mitigation to be implemented [REP6-237]	The conclusions of the Cumulative Effects assessment are presented within **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059], Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083], Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]** and **Application Document 6.2.5.2 (B) Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [REP1A-011]**. The Applicant responses to SCC comments on the conclusions of the CEA can be found in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. The Applicant's response to [REP6-237] is provided in **Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6**.	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]				

Table 3.8 Schedulable Archaeological Site Discovery

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.8.1	**Application Document 7.5.4.1 (C) Overarching Written Scheme of Investigation (OWSI)-Suffolk**, submitted at Deadline 7	Approach to mitigation around significant monument in the Parish of Friston.	At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ, following the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable. If the Applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, the Suffolk County Council Archaeological Service (SCCAS) do not object to the expansion of the Order Limits in line with the areas proposed in the change request. SCCAS are pleased that geophysical survey and trial trenched evaluation has now been completed for these new areas (the additional geophysical survey report has now been submitted and SCCAS are happy to approve this document, and although the additional trial trenched evaluation report is pending, SCCAS have monitored the results of this work in person in the field). Although some additional archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be required in this section of the cable corridor, there is a suitable alternative route which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance. SCC requires clarity on what approach the Applicant is taking regarding the cable route in this area.	The D-Shaped enclosure near Friston is no longer considered to be of national significance, and therefore schedulable quality. As such, stakeholders have agreed that physical impacts on the asset could be mitigated through full excavation of the feature, although this would require the asset to be fully excavated. However, the Applicant is proposing to avoid the D-shaped enclosure and route the cables to the east within the limits of deviation proposed. The requirement for mitigation, either through 'Preservation in Situ' or Full Excavation' is captured in **Application Document 7.5.4.1 (C) Overarching Written Scheme of Investigation (OWSI)-Suffolk**, submitted at Deadline 7.	Agreed

3.2 Other Environmental Topic Matters Still Under Discussion at Deadline 5

Table 3.9 Landscape and Visual

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.9.1	**Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]** **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**	Baseline – Representative Viewpoints	Within the 22 April 2024 meeting, it was set out that viewpoint locations have been updated following stakeholder requests and include two new viewpoints at Friston to ensure a robust approach. Email sent on 18 June 2024 confirmed the Consultee was not in agreement of the approach presented on 22 April 2024. On 18 June 2024, the Consultee requested 10 additional viewpoint locations. This was discussed during the 25 June 2024 thematic meeting and National Grid responded to the requests via email on 15 July 2024. A meeting was held on 10 September 2024 between the Parties to discuss the requested additions. The Council has commented on the additional viewpoint visualisations following the ExA's request for the Applicant to produce them in tables B8, B9 and B10 of [REP2-062]. Whilst these additional viewpoints are welcomed, they do not fully resolve the issue of the inclusion of sufficient viewpoints as SCC had requested further viewpoints pre-application which have not been provided, such as from the diverted PRoW on the converter station site which could have shown the effectiveness of further mitigation planting suggested by SCC. Moreover, the additional viewpoints do not show the bellmouth giving access to the Fromus Bridge which will adversely impact the landscape character. Improved viewpoints may have revealed the need for, and opportunities to, implement further mitigation.	The representative viewpoints were set out in the baseline section of the PEIR. Following the production of the PEIR, five additional representative viewpoints were added following Statutory Consultation comments, additional site work and design development. Following the meeting on 10 September 2024 SCC landscape agreed with the Applicant to disregard five of the additional 10 viewpoints requested by SCC on 18 June 2024. The exclusion of the other five requested additional viewpoints was not agreed by SCC landscape, despite the Applicant's reasoning. However, photography from three of the five outstanding viewpoints, specifically, those viewpoints located within the landscape to the west of the proposed River Fromus crossing (Viewpoints A, B and C), have since been captured and are presented within **Application Document 9.48 River Fromus Visualisations [REP1-298, REP1-299 and REP1-300]**. This document sets out at 3.1.1 that "*the additional visualisations (Viewpoints A, B, and C) demonstrate that the original representative viewpoints (Viewpoints 2 and 20) used to inform the Landscape and Visual Impact Assessment (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**) provided robust locations for representative viewpoints*" and at 3.1.5 that "*the updated visualisations further reinforce the conclusions in the Environmental Statement and demonstrate that these conclusions are unlikely to change as a result of minor changes as the detailed design progresses*". Provision of a viewpoint visualisation from the diverted PRoW was discussed pre-application when the Applicant explained the difficulty in capturing a baseline photograph in the middle of the arable field (as the diverted PRoW would currently be in the middle of the field). Consequently, the Applicant suggested that a cross section could be prepared instead, to provide a visual indication of how the diverted PRoW would sit within the mitigation woodland planting. This is shown on Figure 2 illustrative section D-D in **Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-079]**. A visualisation from the B1121 showing the bellmouth for the permanent access road was not requested by SCC	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				during the pre-application phase. The landscape mitigation in **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk [REP6-079]**, submitted at Deadline 7 shows reinstatement of hedgerow planting around the bellmouth which would tie in with the existing hedgerow planting along the B1121. The Applicant's response is detailed within **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**.	
3.9.2	**Application Document 7.1 (D) Planning Statement [REP6-054]** **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-024]** **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 **Application Document 7.10 Coordination Document [APP-363]** **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** **Application Document 9.90 Applicant's Response to January Hearing Actions Points [REP4-086]**	Mitigation Hierarchy	The proposals are located in highly constrained landscapes and the application of Good Design principles as well as the full Mitigation Hierarchy (including compensation/offsetting for adverse effects that cannot be mitigated) will be essential. SCC has proposed wording for Requirement 3 and a Design Engagement Strategy which is considered necessary to achieve good design in collaboration with relevant stakeholders. During ISH 2 and in response to ISH 3 Action Points SCC proposed further planting to mitigate effects on the Converter Station site, both inside and outside the Order Limits. SCC had raised the concern of inadequate space in the Order Limits for mitigation planting during its pre-application engagement with the Applicant. SCC has been clear that if the Applicant does not agree with its proposals for additional planting, a discussion should be held to discuss potential alternatives so that all opportunities for mitigation are taken as far as possible in relation to residual significant effects. The Applicant has not engaged in any such discussion and considers the mitigation hierarchy to be met, which SCC considers to be unfounded as the planting suggestions it has proposed show there is potential for further planting and this has not been explored by the Applicant. While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Council considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate landscape and visual impacts and effects of which there will be significant residual effects. SCC does not consider that offsetting must in any way rectify the original effect. That can only be achieved by mitigation. Offsetting is intended to be a compensatory mechanism by which those who experience residual significant effects are benefitted proportionally in some other way to make up for the residual adverse effects. Therefore, offsetting does not	The importance of 'good design' and the mitigation hierarchy has been inherent in the iterative process of design and assessment throughout the Pre-Application process. **Application Document 7.1 (D) Planning Statement [REP6-054]** in Section 6.3 sets out how the Suffolk Onshore Scheme complies with policy relating to good design. Regarding landscape compensation, the Applicant's position is set out below at Section 3.9.20. The embedded mitigation is set out in Section 1.7 'Proposed Project Design and Embedded Mitigation' within **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-024]** and the outline Landscape and Ecology Management Plan details the proposed outline landscape mitigation plans (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7). It is not considered that there are areas of off-site landscape planting that would be appropriate in reducing the residual significant adverse effects arising from the Proposed Project. Responses to requests for additional planting should be referred to within **Application Document 9.90 Applicant's Response to January Hearing Actions Points [REP4-086]**. The Applicant provided further information in respect to this in response to 3LVIA4 in **Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111]** and in Appendix A 3GEN1 Mitigation Hierarchy (**Application Document 9.136.1 Applicant Responses to Third Written Questions Appendices [REP6-112]**. The Applicant maintains its position that additional landscape planting within the Order Limits or in the wider landscape would not have any additional mitigatory effect.	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			need to be restricted to within or adjacent to the converter station site, and there is nothing in policy which restricts the interpretation of offsetting in this way. The Applicant has not explored improvements in landscape terms outside the Order Limits and in the wider local context for potential offsetting measures. For instance, the field to the north of the site could have been kept in the Order limits and made into an open access area. It is also possible to compensate for residual landscape effects in other ways such as improved PRoW provision to improve access to the countryside or some other benefit. Therefore, SCC does not consider that the mitigation hierarchy has been followed for Landscape and Visual impacts.		
			SCC also understands that the Applicant has submitted a s106 UU at Deadline 7. Whilst the majority of the substance of that agreement is agreed, SCC considers it necessary for it to be a bilateral agreement to ensure it can be enforced by SCC. SCC has detailed its position in its summary of unresolved matters submitted at Deadline 7.	The Applicant cannot see any reason why the UU would not be legally enforced by SCC.	Not Agreed
3.9.3	**Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]** **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-024]** **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation measures - Design principles and landscape strategy	The Consultee has been consulted on what should be included in the design principles and landscape strategy.. This has been covered in thematic meetings, including the 27 February 2024, 22 April 2024 meetings and 8 January 2025 meetings. The Consultee has reviewed and commented on the design principles and landscape strategy set out in the design documents, landscape and visual ES chapter and Outline LEMP following the submission of the DCO Application in chapter 5 of its LIR [REP1-130]. The Council considers that the present state of the application is inadequate in terms of design for the reasons which have been rehearsed by various IPs throughout the examination. The proposals are located in highly constrained landscapes, and the application of Good Design principles will be essential. SCC considers progress has been made on Requirement 3 in relation to the converter station through correspondence with the Applicant prior to Deadline 7. SCC understands that Requirement 3, and the Key Design Principles are due to be updated according to SCC's requests, including in terms of providing commitments on engagement, independent design review and a commitment to provide a technical statement demonstrating how the design principles have been met. Whilst SCC raised concerns with changes to the Key Design Principles at Deadline 6, as	Design principles and landscape strategy, including reference to 'good design', have been in development for both the Proposed Project and an illustrative masterplan for co-location in parallel as set out in **Application Document 7.11.1 (B) Design Approach Document – Suffolk [REP1A-029]**, **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7. The response to ExQ1 can be found within **Application Document 9.73 Applicant's Responses to First Written Question [REP3-069]** and responses by the Applicant in relation to SCC comments on ExQ1 in **Application Document 9.87 Applicant's Comments on Responses to First Written Questions [REP4-083]**. On Design Principles and the wording of the draft DCO, see response above in section 3.1.3.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			detailed in the list below, it is recognised that the change to the requirement wording to secure full approval of the final design by the relevant planning authority means that certain commitments may not be appropriate as drafted prior to Deadline 6. SCC would ask that the decision maker considers the Applicant's changes to the Key Design Principles at Deadline 6 to weaken certain commitments is necessary. However, provided that the changes requested by SCC are made at Deadline 7, this issue is not considered to cause this item to be "not agreed". These concerns include the following: • CO.3 - (change from "will demonstrate how impact has been minimised" to " demonstrated how ... have sought to minimise...", • ID.3 - addition of "...that seek to exploit..." • ID.4 - addition of "the design will seek to locate..." twice • PS.2 - addition of "...will be followed where • appropriate" • Change of "feasible" or "possible" to "appropriate" in several principles such as R.1, R.2 and R.3 Robust design principles are essential to ensure good design is achieved, as required in section 4.7 of EN-1. The Applicant has provided little detail around the final design and wishes to retain a high degree of flexibility at this stage. The Council does not object with the principle of this approach but requires greater confidence that the design principles will serve as meaningful controls and a robust design process will be followed post-consent which is both integrated with the delivery programme and coordinated with Lion Link. SCC understands that updates at Deadline 7 are being made to the draft DCO and the Key Design Principles to secure this. Provided that these changes adequately address these concerns, SCC considers this matter "agreed".		
3.9.4	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation measures - Outline LEMP	The Consultee is aware of the progress on the oLEMP, and updates have been covered in thematic meetings. The Council has commented on this document from a landscape and visual perspective in chapter 5 of its LIR [REP1-130] such as paragraphs 5.128 to 5.163 and considers these matters under discussion. Whilst changes have been made to the oLEMP, several matters remain outstanding, such as aftercare timing. In addition to issues raised in the Local Impact Report,	The Applicant has set out their response to the comments from SCC in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. Further detail will be provided in the detailed LEMPs in conjunction with the detailed scheme design, including reference to failed planting / adaptive management. As noted at paragraph 1.2.3 in the **Application Document**	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]		further changes needed for the oLEMP were provided by SCC at Deadline 6 such as in response to Action Point 48 from ISH 3 in [REP6-184] and Appendix C of that document. SCC also relayed a list of changes to the Applicant prior to Deadline 7, some of which have been changed which is welcomed by SCC. However, the planting around Friston substation does not match the level of mitigation provided by SPR on the track leading west from Grove Road.	**7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7, the detailed LEMP must be in substantial accordance with the provisions set out in the oLEMP. Additional wording on Adaptive Management was provided at Deadline 6 as part of wider updates to the oLEMP. This reflects the potential for the management period to be 'paused' or 'accelerated' for particular planting by SPR as agreed with the local planning authority, potentially increasing the management period timeframe. Additional changes in the oLEMP provided by SCC in an email to the Applicant on 24 April 2026 have been incorporated into the updated **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7. One outstanding point remains with respect to Figure 5 of the oLEMP and the outline landscape planting for Friston Scenario 2. This relates to an area of woodland planting that SPR in their discharged detailed landscape design incorporate to the north of the PRoW which runs between Little Moor Farm and Grove Road. This area falls outside the Proposed Project Order Limits as explained in response to 3LVIA6 (**Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111]**). The Applicant has addressed this by adding additional text into the updated **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 to state that '*supplementary planting to the south of the PRoW east of Little Moor Farm could be incorporated, subject to the outcome of the detailed design, undertaken pursuant to the oLEMP and in consultation with the relevant authorities*'. The Applicant considers that this resolves all the outstanding comments on the oLEMP.	
3.9.5	**Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-024]** **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**	Assessment conclusions	The Council has reviewed the landscape and visual assessment following the submission of the DCO Application and has set out its views in chapter 5 of its LIR [REP1-130]. Conclusions not yet agreed include where the Council's difference of opinion on sensitivities has implications for conclusions of magnitude of effect. The Council also queries the assessment's conclusions regarding impacts on the National Landscape – see paragraphs 5.46 to 5.58 of its LIR [REP1-130]. The bellmouth access to the haul road connecting to the Fromus Bridge does not appear in visualisations produced by the Applicant and the Council is not confident that the landscape and visual impacts of this part of the development has been robustly assessed. These points have not been resolved during the examination.	The Applicant has provided the Consultee with the landscape and visual impact assessment findings set out in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** for agreement. The Applicant responses to SCC comments on the landscape and visual assessment that have been raised in their Local Impact Report can be found in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. Further detail on the assessment of the Suffolk & Essex Coast & Heaths National Landscape is provided within Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors of the responses to WQ1 (**Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]**) and the answer to 1LVIA9 within the WQ1 responses (**Application**	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				Document 9.73 Applicant's Responses to First Written Question [REP3-069]). Further comments on the assessment findings should be referred to within AP37 in **Application Document 9.90 Applicant's Response to January Hearing Action Points [REP4-086]** submitted at Deadline 4.	

Table 3.10 Ecology and Biodiversity

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.10.1	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Baseline – Ecology surveys, with specific query on deer	The proposed landfall site and cable route is close to the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI. The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which support a variety of bird species, such as woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna. In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant. The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group. The Council is generally content with the Applicant's suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.	It is noted that the Council is generally content with the Applicant's suite of ecological surveys. Following a meeting between the Applicant and Surrey County Council on 10 July 2025, the Applicant understands the Council's concern to relate to deer management to ensure new planting is not damaged given the large deer populations of the area. Paragraph 6.4.2 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7, does refer to use of deer fencing to protect planting.	Agreed
3.10.2	**Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**	Baseline – Survey coverage – concern about limitations in land access in 2022-23	SCC has commented on survey reports submitted with the application in its LIR [REP1-130]. Outstanding concerns exist around the need for further surveys around Benhall Bridge in relation to badgers and bats. SCC understands that the Applicant has assessed the bridge in terms of roosting potential but have not assessed the railway line as a potential migration corridor. An assessment is needed since the railway line is enclosed with vegetation and links to different habitat areas which makes a candidate for a very strong migration corridor. There is also potential for badgers so a check for badger	Survey coverage and access to remaining areas was resolved in the final survey programme and reports. All ecology survey reports have been submitted into the DCO Examination and have been reviewed by Suffolk County Council and East Suffolk Council ecology officers. The Applicant responses to SCC comments on the survey reports set out in their LIR can be found in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			presence and badger setts in the vicinity is needed due to its status as a protected species. The closure or partial closure of setts can only be done with a license from Natural England which is restricted to between July and November. A commitment secured in a certified document to carry out these surveys prior to any works occurring in the area would resolve this item.	Appendix B of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 commits to undertaking these surveys if Option 2 (minor bridge repair works) for Benhall Bridge is to be taken forward. Options 1 and 3 would not involve any vegetation clearance so do not necessitate any surveys.	
3.10.3	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk,** submitted at Deadline 7	Baseline – Dormouse Surveys	It was requested that if any dormice are found, it is reported to the Councils as this would be a notable find for this part of Suffolk where they are generally considered to be absent. It was also requested that damaged tubes along the old railway line be replaced. SCC understands that there have been reports of the presence of a nest for dormice in the area affected by the project. Sufficient surveys must be undertaken to confirm whether there is presence of dormice in this area. However, SCC defers to NE and ESC ultimately.	The Applicant has confirmed that the ecological survey has not confirmed the presence of dormice. However, due to a record of a 'possible' dormouse nest, and the presence of harvest mouse (a NERC Act species), a precautionary approach to the removal of vegetation suitable for dormouse would be followed. Paragraph 7.1.1 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 and paragraph 1.5.7 of **Application Document 6.3.2.2.J ES Appendix 2.2.J Hazel Dormouse Survey Report [APP-108]** already identify that survey would need repeating prior to vegetation clearance, but this is intended as part of pre-construction work rather than to inform the impact assessment for the ES. As a precaution, **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP6-018]** paragraphs 2.9.87 and 2.9.88 assumes that dormice could be present (despite the fact the survey did not confirm presence) and a precautionary method of working (B14) has been set into **Application Document 9.84 Register of Environmental Actions and Commitments** submitted at Deadline 3. This is a standard way of dealing with ambiguous survey records and is in line with paragraph 2.3.20 of the Hazel Dormouse Mitigation Handbook (3rd Edition). Given there is a low expectation of encountering dormice this is considered appropriately precautionary. **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 also commits to an updated dormouse survey where the ambiguous record of dormouse was detected.	Agreed
3.10.4	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Mitigation measures and enhancement	The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring, necessity for the planting to be effective mitigation and potential impacts of climate change. However, SCC welcomes the commitment to adaptive	Refer to **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 . The Applicant does not consider that a ten-year aftercare period (rather than the standard five-years) is required. The purpose of the aftercare period is to determine	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
		presented in the Outline LEMP	management which will be agreed with the relevant planning authority to ensure the provision of aftercare is extended where needed, and so considers this matter resolved.	whether habitat planting has succeeded and whether any replanting or adjustments to management are required to ensure establishment in line with requirements. A five-year period along with the commitment to adaptive management, should be ample to identify if the planting has succeeded or failed. However, with regard to planting on the Applicant's operational landholding (the converter station site) planting will be maintained for the lifetime of the development.	
3.10.5	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Monitoring	The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.	It is noted that the Council welcomes the mitigation measures proposed by the Applicant. Section 7 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 discusses monitoring of the mitigation and planting.	Agreed
3.10.6	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Acid grassland mitigation area	Expressed preference for the landowner to be encouraged to retain the enhanced acid grassland following the 10-year mitigation period. SCC also agree with the ESC position on this matter. SCC notes that the Applicant now appears to intend to undertake acid grassland enhancement only without any creation. This will lead to a greater temporary deficit of acid grassland with a lesser benefit to offset the impact due to the greater benefit creation brings. SCC considers that the worsening of this offsetting measure should be rectified through a commitment to some creation or increased provision for enhancement. SCC notes that Natural England have several outstanding concerns which have not yet been addressed and so this matter cannot be considered agreed until NE's issues are resolved.	The enhanced acid grassland mitigation area is secured for 10 years because it is mitigation for a temporary impact that will have long ceased by 10 years. This is secured within the **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7. This document includes some additional text requested by Natural England. It should be noted that the enhancement is a matter of restoring heavily degraded grassland (scrub and bracken encroached, with poor structure and only some relict acid grassland species) to good quality. Restoring this to good quality is considered to be as valid and ecologically viable as creating good quality grassland on arable land and will be achieved more quickly.	Not Agreed
3.10.7	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Hedgerow restoration	With regard to hedgerow restoration, it was advised that 'heavy standards' should not be included as they are not worthwhile. It is better to go for 'light standards' or feathered trees. The key whatever is used is good ground preparation e.g. a tined subsoiler to rip the ground.	The approach to hedgerow restoration discussed was at thematic meetings. Light standards and feathered trees will be used beyond the cable corridor. This is set out in **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7. The Applicant confirms that the comment from ESC came from the ESC landscape team but confirm that the ESC ecology team were present for this conversation.	Agreed
3.10.8	**Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan**, submitted at Deadline 7	Mitigation – Trenchless techniques	The Consultee has agreed to the use of trenchless techniques at landfall. Impacts on protected species within the designated ecological sites should adequately avoided or mitigated such as by timing works appropriately. Particular species of concern are Wintering Birds around the North Warren Reserve where drilling in the winter must be avoided. However, if Natural England are in agreement	The Applicant has confirmed trenchless techniques will be used for crossing the SSSI/RSPB reserve and is a commitment in the DCO**.** This is secured in the Offshore Outline CEMP (**Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan**, submitted at Deadline 7) and the Register of Environmental Actions and Commitments (**Application**	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC), submitted at Deadline 7		with the Applicant's approach, then this matter is considered resolved.	**Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7)). There is no requirement for a winter restriction on drilling west of North Warren RSPB Reserve. The modelling for the DCO indicates that noise levels as a result of drilling will not exceed the noise disturbance threshold agreed with Natural England and their greater concern has been impacts on breeding birds (which will also not arise due to drilling).	
3.10.9	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation - Biodiversity awareness training	The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.	Paragraph 1.6.2 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 does include provision of 'toolbox talks' which the Applicant considers analogous to the requested Biodiversity Awareness Training.	Agreed
3.10.10	**Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**	Biodiversity Net Gain (BNG)	This strategy was presented to the Consultee by National Grid at the end of 2024. Provision should be made for BNG maintenance and monitoring for a 30-year period in accordance with relevant policy and legislation. SCC understands that BNG has not been agreed with ESC as the relevant planning authority for BNG and so considers this matter unresolved.	Approach to biodiversity and environmental net gain is set out in **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**. The Applicant shared the Heads of Terms for a Unilateral Undertaking (UU) with all the Local Authorities for comment. The Heads of Terms includes a contribution to monitoring fees and a commitment that the Applicant will monitor any on-site BNG provided as part of the development for a period of thirty years and shall report to the LPAs on such monitoring, in accordance with the detailed LEMP. There is not yet in force a statutory legal requirement for the Proposed Project to deliver BNG, and it is seen as entirely beneficial that it will be delivered. The section 106 UU will commit the Applicant to deliver BNG in line with its corporate commitments. This UU will have the same enforceability as a bilateral section 106 agreement and so is considered entirely appropriate and enforceable in these circumstances.	Not Agreed
3.10.11	**Application Document 6.2.2.2 (E) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP6-018]**	Assessment conclusions	SCC has set out its views on this ES chapter and its conclusions in its LIR [REP1-130]. SCC would query how several of the project's construction phase impacts include long term beneficial impacts when such benefits won't be realised until the operational phase. These impacts are also reported for the operational phase. SCC considers that such an approach may dilute the negative impacts which will be realised during the construction phase.	The Applicant provided the ecological assessment in **Application Document 6.2.2.2 (E) Part 2 Suffolk Chapter 2 Ecology & Biodiversity [REP6-018]** submitted with the DCO Application. A detailed response on this point is provided in the response to question AP20 in **Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037]**). The Applicant has also considered habitat gains during both construction and operational periods. This is because although the planting of woodland, grassland and	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				wetlands as part of the Proposed Project is permanent (rather than temporary) the amount is sufficient to offset the temporary and permanent losses combined. While there will inevitably be a lag time between the planting of some habitats and their maturation this is recognised in the Environmental Statement. Reporting only the negative effects of construction (temporary habitat loss) in the construction effects section of the ES Chapters would result in the reporting of significant habitat losses (until such time as replanted habitat has matured) for habitats and ornithology without any recognition of the context that not only will temporary habitat losses be replanted but the quantified temporary losses of woodland, grassland and wetlands will be more than offset by quantified gains from new planting.	

Table 3.11 Cultural Heritage

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.11.1	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7	Overarching Written Scheme of Investigation	All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation ("OWSI"). The submitted OWSI is currently in draft form and comments by SCCAS (submitted at Deadline 6) need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. This includes suitable provision within the OWSI for a Project Wide Written Scheme of Investigation (PWWSI). SCC understands that the OWSI has been updated to include this at Deadline 7 but the wording is not yet agreed. SCCAS will continue discussions with the Applicant to get this wording agreed. Now Agreed based on callheld on 5th May 2026 (further details in 'Applicants Current Position')	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]** was updated at Deadline 5 (see **Application Document 7.5.4.1 (B) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [REP5-070]**)).This included updates based on comments from Historic England and SCCAS. In line with SCCAS' preferred approach, the final Overarching Written Scheme of Investigation will set out the requirements for further evaluation and mitigation for the entire Suffolk Onshore Scheme, and will be supplemented by site-specific method statements to be prepared by the appointed archaeological contractor. Further comments were received from SCCAS and HE, and an updated OWSI was submitted at Deadline 7 (**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk**). All comments have now been addressed and agreed, with the exception being the requirements relating to the Project Wide Written Scheme of Investigation (PWWSI) for which discussions are ongoing. Discussions with SCC are ongoing regarding the format the PWWSI will take. However, it was agreed at an online meeting held on the 5th May 2026 that a single PWWSI	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				would be produced for Suffolk and another for Kent rather than being produced in stages for smaller areas. It was also agreed that the PWWSI will comprise a plan showing all areas of archaeological interest within the Order Limits for the Suffolk Onshore Scheme, with mitigation areas defined where known (along with basic detail regarding the nature of mitigation required e.g. PIS/SPE/SME), alongside areas within the red line boundary where evaluation (followed by mitigation as necessary) has not be undertaken, with further updated versions issued detailing final mitigation areas as the design develops. This plan will also detail areas where no further Historic Environment Management Plans SSWSIs are required under Requirement 14(2). The PWWSI will be produced at the earliest stage, and will be used to inform the SSWSIs, with all SWWSIs approved by SCC in consultation with HE as detailed in Requirement 14 of the draft DCO. The PWWSI will be iteratively updated as necessary as the design progresses and final archaeological investigations are completed, with updated versions submitted alongside SSWSIs to help understand the context.	
3.11.2	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7 **Application Document Responses to ExQ1 [REP3-101]** **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Baseline geophysical surveys and trial trenching / and Mitigation Strategies	Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin. Three phases of trial trenched evaluation have been completed covering a large proportion of the order limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted. SCCAS consider that any remaining areas within the order limits that were not included in the previous phases of trial trenched evaluation and where any pre-commencement or construction works involving ground disturbance will take place, will require evaluation, at the earliest opportunity post-consent (if consent is granted) so that mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined. For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place	Remaining areas within the Order Limits that were not available for trenching during the Phase 1, 2, and 3 evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project and site accesses, haul roads, compounds and ecological mitigation that would result in ground disturbance, will be subject to further intrusive trial trench evaluation. SCCAS have agreed, in **Application Document Responses to ExQ1 [REP3-101]**, that any further archaeological evaluation works required can be undertaken post consent. Further trial trench evaluation and mitigation strategies, which will include detailed archaeological excavation and recording and methodology for the preservation of archaeological remains, will be secured in the DCO (Requirement 14 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7) through the updated Suffolk Onshore Overarching Written Scheme of Investigation which was submitted at Deadline 7 (**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk**), and includes the ability to undertake evaluation and mitigation works as required. Discussions with SCC are ongoing regarding the format the PWWSI will take. However, it was agreed at an online	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			to enable the potential impacts of planned works to be fully understood. Provision for ongoing archaeological assessment and mitigation work need to be clearly set out in the Final OWSI (amendments still required to enable approval of this document- latest comments submitted at Deadline 6). This includes suitable provision within the OWSI for a Project Wide Written Scheme of Investigation (PWWSI). SCC understands that the OWSI has been updated to include this at Deadline 7 but the wording is not yet agreed. SCCAS will continue discussions with the Applicant to get this wording agreed. SCCAS are however in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.	meeting held on the 5th May 2026 that a single PWWSI would be produced for Suffolk and another for Kent rather than being produced in stages for smaller areas. It was also agreed that the PWWSI will comprise a plan showing all areas of archaeological interest within the Order Limits for the Suffolk Onshore Scheme, with mitigation areas defined where known (along with basic detail regarding the nature of mitigation required e.g. PIS/SPE/SME), alongside areas within the red line boundary where evaluation (followed by mitigation as necessary) has not be undertaken, with further updated versions issued detailing final mitigation areas as the design develops. This plan will also detail areas where no further Historic Environment Management Plans SSWSIs are required under Requirement 14(2). The PWWSI will be produced at the earliest stage, and will be used to inform the SSWSIs, with all SWWSIs approved by SCC in consultation with HE as detailed in Requirement 14 of the draft DCO. The PWWSI will be iteratively updated as necessary as the design progresses and final archaeological investigations are completed, with updated versions submitted alongside SSWSIs to help understand the context.	
3.11.3	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7	Mitigation – Archaeological mitigation at the Saxmundham converter station	The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site, with each party responsible for different areas of mitigation. An awareness by both parties will however be needed of the archaeological mitigation requirements across the full extent of the converter station site, so that suitable measures can be made to ensure no disturbance occurs within areas where archaeological mitigation is still required, but which is the responsibility of the other project. Evaluation (followed by mitigation as appropriate) will also need to be completed within any areas at the Saxmundham converter site where works involving ground disturbance will occur as part of any pre-commencement or construction works associated with the SEALink project, but which have not previously been subject to trial trenching. These areas should be clearly identified in the OWSI. Provision for ongoing archaeological assessment and mitigation work need to be clearly set out in the Final OWSI (amendments still required to enable approval of this document- latest comments submitted at Deadline 6). This includes suitable provision within the OWSI for a Project Wide Written Scheme of Investigation (PWWSI). SCC	The assessment of impacts for Suffolk as detailed in **Application Document 6.2.2.3 (B) Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]** was based on three possible options for a temporary construction compound north of the Saxmundham Converter Station, two of which fell within the area of the archaeological remains. The detailed design work that is ongoing currently places the temporary construction compound to the west of the archaeological remains and therefore impacts are no longer expected, with archaeological remains instead being 'preserved in situ'. If this changes, a mitigation strategy will be developed in consultation with the Archaeological Advisor to the LPA from SCCAS and will be approved in line with a Site Specific WSI (SSWSI) as set out in the updated Suffolk Onshore Overarching Written Scheme of Investigation submitted at Deadline 7 (**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk**). Discussions with SCC are ongoing regarding the format the PWWSI will take. However, it was agreed at an online meeting held on the 5th May 2026 that a single PWWSI would be produced for Suffolk and another for Kent	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			understands that the OWSI has been updated to include this at Deadline 7 but the wording is not yet agreed. SCCAS will continue discussions with the Applicant to get this wording agreed. SCCAS are however in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.	rather than being produced in stages for smaller areas. It was also agreed that the PWWSI will comprise a plan showing all areas of archaeological interest within the Order Limits for the Suffolk Onshore Scheme, with mitigation areas defined where known (along with basic detail regarding the nature of mitigation required e.g. PIS/SPE/SME), alongside areas within the red line boundary where evaluation (followed by mitigation as necessary) has not be undertaken, with further updated versions issued detailing final mitigation areas as the design develops. This plan will also detail areas where no further Historic Environment Management Plans SSWSIs are required under Requirement 14(2). The PWWSI will be produced at the earliest stage, and will be used to inform the SSWSIs, with all SWWSIs approved by SCC in consultation with HE as detailed in Requirement 14 of the draft DCO. The PWWSI will be iteratively updated as necessary as the design progresses and final archaeological investigations are completed, with updated versions submitted alongside SSWSIs to help understand the context.	
3.11.4	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7	Mitigation – Archaeological mitigation at the Friston substation	At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. Evaluation (followed by mitigation as appropriate) will also need to be completed within any areas at the Friston substation site where works involving ground disturbance will occur as part of any pre-commencement or construction works associated with the Sea Link project, but which have not previously been subject to trial trenching. These areas should be clearly identified in the OWSI. Provision for ongoing archaeological assessment and mitigation work need to be clearly set out in the Final OWSI (amendments still required to enable approval of this document- latest comments submitted at Deadline 6). This includes suitable provision within the OWSI for a Project Wide Written Scheme of Investigation (PWWSI). SCC understands that the OWSI has been updated to include this at Deadline 7 but the wording is not yet agreed. SCCAS	See **Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk** updated at Deadline 7. This included the option for further evaluation works in areas not previously subject to evaluation trenching. As such, the Applicant has agreed to further evaluation and mitigation requirements with the Archaeological Advisor to the LPA from SCCAS for areas where preservation in situ will not be possible, and where the Suffolk Onshore Scheme will result in physical impacts. SCCAS have agreed, in **Application Document Responses to ExQ1 [REP3-101]**, that any further archaeological evaluation works required can be undertaken post consent. Discussions with SCC are ongoing regarding the format the PWWSI will take. However, it was agreed at an online meeting held on the 5th May 2026 that a single PWWSI would be produced for Suffolk and another for Kent rather than being produced in stages for smaller areas. It was also agreed that the PWWSI will comprise a plan showing all areas of archaeological interest within the Order Limits for the Suffolk Onshore Scheme, with mitigation areas defined where known (along with basic detail regarding the nature of mitigation required e.g. PIS/SPE/SME), alongside areas within the red line	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			will continue discussions with the Applicant to get this wording agreed. SCCAS are however in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.	boundary where evaluation (followed by mitigation as necessary) has not be undertaken, with further updated versions issued detailing final mitigation areas as the design develops. This plan will also detail areas where no further Historic Environment Management Plans SSWSIs are required under Requirement 14(2). The PWWSI will be produced at the earliest stage, and will be used to inform the SSWSIs, with all SWWSIs approved by SCC in consultation with HE as detailed in Requirement 14 of the draft DCO. The PWWSI will be iteratively updated as necessary as the design progresses and final archaeological investigations are completed, with updated versions submitted alongside SSWSIs to help understand the context.	
3.11.5	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7	Mitigation – Archaeological remains	Suitable provisions for archaeological mitigation must be made for remains of archaeological significance which have been defined during previous phases of archaeological evaluation, or which are subsequently defined during ongoing evaluation work within the Sea Link order limits. Provision for ongoing archaeological assessment and mitigation work need to be clearly set out in the Final OWSI (amendments still required to enable approval of this document- latest comments submitted at Deadline 6). This includes suitable provision within the OWSI for a Project Wide Written Scheme of Investigation (PWWSI). SCC understands that the OWSI has been updated to include this at Deadline 7 but the wording is not yet agreed. SCCAS will continue discussions with the Applicant to get this wording agreed. SCCAS are however in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document.	The Applicant has updated the OWSI in line with comments from SCC as well as HE, and have submitted an updated OWSI at Deadline 7 (**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk**). The includes the requirement for all evaluation and mitigation to be agreed and approved via a SSWSI with SCC and HE. All comments have now been addressed and agreed, with the exception being the requirements relating to the Project Wide Written Scheme of Investigation (PWWSI). Discussions with SCC are ongoing regarding the format the PWWSI will take. However, it was agreed at an online meeting held on the 5th May 2026 that a single PWWSI would be produced for Suffolk and another for Kent rather than being produced in stages for smaller areas. It was also agreed that the PWWSI will comprise a plan showing all areas of archaeological interest within the Order Limits for the Suffolk Onshore Scheme, with mitigation areas defined where known (along with basic detail regarding the nature of mitigation required e.g. PIS/SPE/SME), alongside areas within the red line boundary where evaluation (followed by mitigation as necessary) has not be undertaken, with further updated versions issued detailing final mitigation areas as the design develops. This plan will also detail areas where no further Historic Environment Management Plans SSWSIs are required under Requirement 14(2). The PWWSI will be produced at the earliest stage, and will be used to inform the SSWSIs, with all SWWSIs approved by SCC in consultation with HE as detailed in Requirement 14 of the draft DCO. The PWWSI will be iteratively updated as	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				necessary as the design progresses and final archaeological investigations are completed, with updated versions submitted alongside SSWSIs to help understand the context.	
3.11.6	**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7 **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7	Mitigation – Preservation in situ requirements	Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward. Provisions for preservation in situ need to be clearly set out in the Final OWSI (amendments still required to enable approval of this document- latest comments submitted at Deadline 6). To the west of Grove Road at Friston, the order limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO order limits as part of the Sea Link project, in line with preservation in situ requirements. Any works within the area of KND 009 must be in line with the agreed Preservation in Situ strategy being followed by the EA1N/2 project (SCCAS do not agree with the interpretation made in the geophysical survey report and as no trial trenched evaluation has been undertaken within this part of the proposal area, a cautious approach must be followed given this is a possible church site with the potential for the survival of remains of high significance).	Updates to the OWSI at Deadline 5 included updates based on comments received by the Archaeological Advisor to the LPA from SCCAS. The Applicant has agreed mitigation, including methods of preservation in situ, with the Archaeological Advisor to SCC as the Suffolk Onshore Scheme detailed design has progressed and the final OWSI is developed. The Historic Environment Record (HER) record for this asset notes that the location provided for the lost church for asset KND 009 may be incorrect, with two further locations suggested (KND001 and KNG006). Geophysical survey undertaken as part of the EA1N/2 works interpreted the anomalies in the area of KND 009 as likely to be geological in origin rather than archaeological. The Applicant provided an updated plan at Deadline 4 to illustrate the interactions with EA1N and EA2 updated planting plans. Refer to Figure 5 within the updated Suffolk oLEMP at Deadline 7 (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7). The planting proposed for Friston Scenario 2 aligns with the updated EA1N and EA2 plans, so should be in line with the agreed Preservation in Situ strategy.	Agreed
3.11.7	**Application Document 7.5.4.1 Outline Onshore Overarching Written**	Mitigation –	Although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk** was updated at Deadline 7. This included	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Scheme of Investigation (OWSI) – Suffolk, submitted at Deadline 7	Archaeological Outreach Strategy plan	agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.	updates based on comments received by the Archaeological Advisor to the LPA from SCCAS and HE. The OWSI captures the requirement for all evaluation and mitigation, including a suitable and proportionate programme of outreach, with the Archaeological Advisor to SCC via Site Specific WSIs (SSWSI).	
3.11.8	**Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Requirement 14 wording	SCCAS are generally satisfied with the wording of Requirement 14 (Archaeology). SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: 'All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, ***prior to the commencement of any pre-commencement or construction works in that stage'***. This change is supported by the ExA as set out in the 'Schedule of ExA's recommended amendments to the applicant's dDCO.' SCC understands that the Applicant is updating Requirement 14 at Deadline 7 but this does not cover all pre-commencement operations which could impact archaeological remains. This is because activities associated with non-intrusive pre-commencement works still have the potential to impact upon below ground archaeological remains or contravene requirements for defined archaeological preservation in situ areas. Therefore, SCC maintains that its proposed wording, which aligns with the ExA's proposed change, should be included in the DCO.	The Applicant has updated the wording for Requirement 14 to take into account pre-commencement works. The new wording now states that all mitigation must be agreed and undertaken before any works commence "*including any pre-commencement operations that involve intrusive groundworks which for the avoidance of doubt, includes any vegetation removal, where this removal includes intrusive groundworks*".	Not Agreed

Table 3.12 Water Environment

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.12.1	**Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]** **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7	Drainage Design – Infiltration	National mapping for the converter station site area suggests soils have poor properties for infiltration. Therefore, the Council, as Lead Local Flood Authority ("LLFA"), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. For the converter station site. infiltration is shown unlikely to succeed so the undertaker will discharge into the watercourse at an agreed rate. SCC is content with this approach. The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, in the event that the substation is not delivered under SPR's existing consent. The Applicant has now completed this request and are now mirroring SPR's approach which the Council is content with.	The Applicant has undertaken preliminary ground investigations at the Saxmundham Converter Station site that have confirmed poor infiltration rates. The Applicant's proposal for drainage in this location is to attenuate the flow to greenfield runoff rates and outfall to local watercourses. Indicative layouts for the attenuation ponds and outfalls are shown within **Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]**. As detailed in Section 5 of **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7**,** infiltration testing results from surveys undertaken on behalf of SPR in 2024, provide the necessary justification for adopting a solely infiltration-based approach for the discharge of surface water from the proposed Friston substation site, consequently eliminating the previous hybrid design of an infiltration pond with an overflow outfall. The Applicant is continuing to work closely with SPR to understand their design development and additional infiltration testing is planned for the end of 2025 by SPR to support the drainage design. Should the Applicant need to deliver the Friston Substation, any investigation results would be requested from SPR to be validated and used to inform the detailed designs of the drainage system to be delivered by the Applicant.	Agreed
3.12.2	**Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7	Drainage Design – Surface Water Drainage Strategy	In submission previous to Deadline 5, SCC stated that the Applicant needs to clearly demonstrate that the outline surface water drainage strategy (Appendix C of [APP-292]), adheres to the National standards for sustainable drainage systems (SuDS). Appendix C of the Application Document 6.8 Flood Risk Assessment [APP-292] is in the LLFA opinion lacking insufficient detail at this time to provide sufficient assurance that a surface water drainage strategy will be implemented in accordance with LLFA requirements, i.e. basin depth, water depth, side slopes etc. The DCO should reference an outline drainage strategy for both the converter station and the substation. At deadline 4, SCC submitted a list of outstanding issues with the outline Drainage Strategy in response to Action Point 81 of ISH 2 [REP4-150]. Most of these issues have been resolved with the updated outline Drainage Strategy. However, the detail of the attenuation basins needs to be in accordance with the LLFA guidance in its entirety which has not been fully complied with for side slope gradient. The	The Applicant has submitted **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7 to the examination. This document expands upon the information provided in Appendix C of **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** and has been prepared following guidance set out in the National Standard for Sustainable Drainage Systems. Comments from the LLFA on the strategy have been addressed through updates at Deadline 5 and Deadline 6. With regard to the Drainage Management Plan that will be developed by the Contractor, it is secured by commitment W14 within **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 that this plan must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			side slopes of the attenuation basins which need to be at a gradient of 1 in 4 rather than 1 in 3. However, SCC understands that updates at Deadline 7 have been made to resolve this matter. Provided that this change resolves SCC's concern, SCC considers this matter resolved.	Schedule 3 of the draft DCO (see **Application Document 3.1**). The side slopes of the basins have been discussed, and it has been agreed with SCC that basins with anything steeper than a 1:4 side slope would be subject to a risk assessment. The Applicant confirms that there are no outstanding issues with the ESWDB with regard to discharge rates. Refer to **Application Document 9.52 Draft Statement of Common Ground Between National Grid Electricity Transmission and East Suffolk Water Management Board**.	
3.12.3	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**	Drainage Design – Drainage return period	The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction. Concerns remain around the location of the attenuation basin within Flood Zone 3 in relation to the converter station haul road which was discussed during ISH 3. SCC now understands that the Applicant intends to use infiltration trenching instead, although the outline Drainage Strategy has not yet been updated to reflect this. However, SCC does not consider this to be an adequate solution as the temporary infiltration trenching would still be in Flood Zone 3 without adequate justification to SCC demonstrating that locating a solution within an area of a lower level of flood risk is feasible.	The Applicant shared further information with SCC regarding the alternative proposal to a temporary drainage basin in Flood Zone 3, clarifying that a filter drain is proposed to accept the runoff from the haul road in place of the basin. In addition, further justification has been provided to demonstrate that a sustainable solution in Flood Zone 1 is not feasible. Suffolk Flood Risk Management Strategy, dated 2023, states 'temporary SuDS designed and built for the construction phase only must be designed to manage runoff for all events up to and including the 1 in 100 (1%) AEP storm (SCC local standard), but no allowance for climate change is required'. Therefore, a 1 in 100-year return period will be applied to all temporary works including haul roads. Appendix C of **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** provides information on the drainage proposals for haul roads. For the purposes of sizing drainage features, the haul road surface has been treated as 100% impermeable and calculations are based on an average haul road width of 7 m. A channel drain along the edges of the haul road will collect runoff and will discharge into proposed attenuation ponds which include a treatment element to clean anticipated pollutants from the road. The haul road has been subdivided into sections based on the existing longitudinal ground profile and a pond allowed for at anticipated low points along the route. The ponds proposed are either, infiltration ponds where ground investigations have demonstrated that infiltration is viable, or attenuation ponds where infiltration is considered unviable. Attenuation ponds would discharge into existing watercourses via a control device that limits discharge rates to greenfield. Sufficient space has been provided within the Order Limits to accommodate such drainage provision.	Not Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				Further detail regarding attenuation volumes to accommodate runoff from the haul road is provided in **Application Document 9.17.1 (C) Suffolk Drainage Strategy** submitted at Deadline 7.	
3.12.4	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]** **Application Document 9.122 Surface Water Flood Risk and Climate Change – Technical Note [REP5-134]**	Flood Risk – Surface water mapping	Previously, SCC stated: where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Surface Water Study ("SWMP") for Friston. Updates have been made throughout the examination to resolve SCC's issues, including updating the surface water mapping to reflect the referenced BMT Surface Water Study for Friston. The requested National Flood Maps for surface water showing climate change allowance were provided in the Surface Water Flood Risk and Climate Change - Technical Note [REP5-134]. This document provides the detail requested by SCC in relation to surface water mapping showing climate change allowance. Therefore, this item is considered resolved.	Surface water flood map plans are provided in the **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**, specifically Figures 2A and 2B in Appendix A. These maps clearly present the high, medium and low flood risk zones, based on the latest National Flood Risk Assessment (NaFRA2) from the Environment Agency, in the context of the Proposed Project's temporary works (Figure 2A) and operational infrastructure (Figure 2B). Further, an extract of mapping from the BMT SWMP for Friston is provided in Plate 4.1 of **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**. The Proposed Project infrastructure has been sited to avoid areas at high risk of pluvial flooding where practicable. Where these areas have not been avoided a range of mitigation measures are secured, as detailed in commitments W06, W07, W10 and W14 of the **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7. The areas required for the SuDS assets proposed are shown in **Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]**. **Application Document 9.122 Surface Water Flood Risk and Climate Change – Technical Note [REP5-134]** includes the requested maps with the climate change extents.	Agreed
3.12.5	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** **Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]**	Ordinary watercourses	The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, in particular the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to an ultimate viable discharge point. The Applicant should commit to pre-construction surveys to identify any remaining watercourses to ensure the relevant body is aware of these watercourses before works are	Whilst not all ordinary watercourses are shown in the Applicant's figures, all of those ordinary watercourses that the Proposed Project interacts with have been subject to surveys and have been assessed as receptors within the ES and in **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**. **Application Document 2.14.1 (B) Indicative General Arrangements Plans - Suffolk [REP4-008]** identifies the temporary and permanent infiltration and attenuation ponds and the outfalls proposed for the attenuation ponds. The ordinary watercourse mentioned in point 57 would be diverted along the northern boundary of the proposed Friston Substation as proposed by SPR. The natural infiltration basin adjacent to the proposed permanent	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			undertaken. On the basis that this commitment will be added at Deadline 7, this matter is considered agreed. .	access road remains unchanged by the works associated with the Proposed Project. As stated in commitment W01, *'All works within main rivers, ordinary watercourses and board drains, will be in accordance with a method approved under environmental permits issued under the Environmental Permitting Regulations by the Environment Agency and /or the relevant secondary consents or permits from the Lead Local Flood Authorities and Internal Drainage Boards'*. The Applicant has revised commitment W01 to specify suitable pre-construction surveys to identify all watercourses that would interact with construction works within **Application Document 7.5.3 (E) Outline Onshore Construction Environmental Management Plan** for Deadline 7.	
3.12.6	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**	Sequential and Exception test	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.	See the Applicant's response to this matter within Table 3.3 (Reference 3.2) of **Application Document 9.149 (B) Applicant's Comments on Other Submissions Received at Deadline 6** submitted following Deadline 7.	Not Agreed

Table 3.13 Geology and Hydrogeology

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.13.1	**Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074]** **Application Document 9.83 (B) Code of**	Excavation of minerals	The Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources. Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of, a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and; e) disposal.	The ES includes references to applicable control and management measures for waste. Further detail can be found in **Application Document 7.5.3 (E) Outline Onshore Construction Environmental Management Plan** and **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** both submitted at Deadline 7. There is also a separate **Application Document 7.5.2 (E) Outline Offshore**	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Construction Practice [REP4-232] **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan**, submitted at Deadline 7 **Application Document 9.115.1 Outline Materials and Waste Management Plan – Suffolk [REP5-128]**		Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities. In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals. Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development or provided to the market for sand and gravel where possible. SCC welcomes the production of an outline Materials and Waste Management Plan. The final approved plan should provide more detail on reuse aggregate/minerals excavated as part of the works of the project as far as possible rather than from other sources. SCC is satisfied that this is secured in the outline plan.	**Construction Environmental Management Plan** submitted at Deadline 7. The waste hierarchy will be followed in line with **Application Document 9.115.1 Outline Materials and Waste Management Plan – Suffolk [REP5-128]**. This sets out the framework for the management of waste generated during the construction of the Proposed Project. It details how waste will be reduced, reused, managed and disposed of in accordance with the waste hierarchy.	
3.13.2	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003]**	Access to mineral resources	Removal of the development following cessation of use will be required to restore access to mineral resources. The Applicant's position does not appear to cohere with paragraph 3.1.2 of the Preliminary Minerals Resource Assessment [APP-118] which states: "*This infrastructure is generally considered to be temporary, as although during the operational lifetime of the Proposed Project the areas of mineral could not be feasibly extracted (beneath the built elements), on decommissioning, the infrastructure could be removed and access to the underlying mineral restored*" If the Applicant has no plans to decommission the proposed project, the infrastructure and its effects should not be considered to be temporary. However, SCC is satisfied that land will be reinstated for mineral use upon decommissioning of the built infrastructure.	As stated in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003]** of the ES, whilst there are currently no plans to decommission the Proposed Project, most elements of the Proposed Project have lifespans of approximately 40 years (with the exception of pylons which have a typical lifespan of up to 80 years). In the event the Proposed Project is decommissioned the infrastructure could be removed and access to the underlying mineral restored. Further details associated with decommissioning are provided in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1-003]**.	Agreed

Table 3.14 Agriculture and Soils

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.14.1	**Application Document 9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090]** **Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053]** **Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]Application Document 3.1 draft Development Consent Order** submitted at Deadline 7	Impacts to best and most versatile ("BMV") agricultural land	Areas of best and most versatile ("BMV") agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning.	**Application Document 9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090]** states that the total area of BMV land required permanently in Suffolk is 10.93 ha. Requirement 13 of the **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7 states that in the event that the Proposed Project is decommissioned and the land is reinstated this would also involve the reinstatement of land used for above ground infrastructure. This would comprise the reinstatement of the BMV land required permanently in Suffolk, with land returned to the baseline ALC grade where practicable. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning and detailed in the Outline Soil Management Plan (**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]**). Implementation of these measures would reduce detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement (which includes productivity), with all reinstated land returned to the baseline ALC grade where practicable.	Agreed
3.14.2	**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]**	Impacts to best and most versatile ("BMV") agricultural land	Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning.	During decommissioning, there would be temporary disturbance on BMV land assumed to be similar to that identified during the construction phase. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning as set out in the Defra Construction code of practice for the sustainable use of soil on construction sites (Department for Environment, Food and Rural Affairs, 2009), and detailed in the Outline Soil Management Plan (**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066])**. Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement.	Agreed
3.14.3	**Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** **Application Document 9.84 (E) Register of Environmental Actions**	Impacts - disruption to field drains	The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and mitigation would be required to restore drainage following construction and decommissioning. SCC is satisfied that the REAC and Requirement 9 of the draft DCO [REP6-006] secures this.	**Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** covers land drainage, and includes commitments W10/AS05 to re-provide suitable means of existing field (land) drainage should this be disrupted by the proposed works. The specific wording of commitment W10 (from **Application Document 9.84 (E) Register of Environmental**	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	and Commitments (REAC), submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7			**Actions and Commitments (REAC)** submitted at Deadline 7 is as follows: *"Severance of existing land drainage routes, including agricultural field drainage systems would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained."* Compliance with the REAC is secured through DCO Schedule 3, Requirement 6 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7 and would ensure the existing drainage regime is reinstated and as such continues to function and support land use practices post-construction.	
3.14.4	**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]Application Document 6.3.2.6.A ES Appendix 2.6.A Predictive Agricultural Land Classification Report – Suffolk [APP-121]** **Application Document 9.3- Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090]**	Baseline and Assessment Methodology – Survey density	The Consultee queries the proposed survey density, as set out in the assessment methodology, and would like to understand how this equates to the requirement in published guidelines.	Detailed Agricultural Land Classification (ALC) surveys were undertaken in line with published guidance (Defra & Welsh Government, 2025) at a minimum density of 1 auger bore per hectare; in practice this equated to 1 auger bore per 100 m within the sections of linear cable alignment, and 1 auger per 1 ha grid for wider areas such as the substation. Survey methodology and results are detailed in **Application Document 9.3- Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090]**.	Agreed
3.14.5	**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]**	Mitigation – Soil management	The Consultee asked that lessons learned from the Bramford to Twinstead project be taken on board, in particular the allowance for soils to be moved when wet. The threshold of >10mm of rain in 24 hours should be reconsidered in relation to particularly sensitive soils, particularly clay soils, since there can be substantial rainfall which does not meet the definition of heavy rainfall which makes these soils wet to the extent that they will be damaged by stripping and handling. The Applicant recognises that there are significant areas of deep loamy and clay soils which are more susceptible to damage if handled when wet. However, no specific commitments are included on how works would be managed in relation to such soils where there's rainfall. It is not sufficient to say that the soil type will be "taken into account" as the Applicant may decide to simply continue works which	The Bramford to Twinstead project did not initially commit to producing a Soil Management Plan (SMP). However, the commitment was given to producing a SMP during examination. The Proposed Project has learned from this and an outline SMP (oSMP) (**Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]** has been produced for the DCO Application. This will require soils to be handled when suitably dry and friable. However, there may be soils which are rarely non-plastic which will need to be moved, or critical works to be completed. The oSMP requires soil plasticity tests to be undertaken and decisions recorded should soils be handled when plastic. The soil plasticity testing is required in addition to the rainfall criteria stop work requirement. As such, there are two points of control in relation to the risks of damaging soils by handling them in inappropriate	Agreed

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			damage the soils. Text should be revised to add specific commitments over how these soils will be managed and protected during wet conditions. The Council is therefore not satisfied that paragraphs 6.1.1 to 6.1.5 are sufficiently robust as the commitments are not strong enough to avoid lasting damage from the stripping and handling of soils in wet conditions. Reconditioning to restore soils handled in wet conditions will take an extended period of time with appropriate treatment and the Council is not convinced that the commitments in the oSMP will ensure wet soils aren't handled as far as possible and where they are, adequate reconditioning will take place. SCC recognises the changes made to the outline SMP throughout the examination, particularly the addition of section 8.7 (Aftercare) at Deadline 6 [REP6-066]. SCC welcomes the commitment to up to 5 years of aftercare for soils and considers that this should ensure any issues with the reconditioning process are rectified. SCC expects that this will be done in collaboration with landowners.	conditions. The oSMP also requires that handling of soils when in a plastic state (based on the soil plasticity testing detailed in the oSMP) will need prior approval from the Soil Scientist and for there to be a plan in place to minimise damage and ensure any remedial measures are undertaken at the appropriate time, as set out in Appendix F of **Application Document 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066]**. The reference to 'as far as practicable' in Appendix C relates to the requirement for 'No Handling', and does not refer to the requirement for reconditioning. All soils handled when plastic will require recording as such and identified on a plan for reconditioning at the appropriate time and in appropriate conditions. In recognition of the fact that in some instances time will be required for these soils to settle and return to their preconstruction condition, Section 8.7 of the oSMP (Aftercare) outlines the requirements of an Aftercare Management Plan to ensure that soil replaced in accordance with good practice soil handling, and that soils are monitored and managed following replacement to ensure sufficient time (and intervention where required) to fully return to their pre-construction condition. The section also provides details on aftercare durations, positions of responsibility, management commitments and suggested methodologies.	

Table 3.15 Traffic and Transport

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.15.1	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Assessment: Construction traffic routes	The Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are detailed in 11.125 of SCC's LIR [REP1-130] and include: • B1121: A12 Benhall to A12 Dorleys Corner (S-RJ6, S-RJ7; S-RL5, S-RL6) • B1121: from Benhall to A1094 Friston (S-RJ8, S-RL8) • B1121 – Benhall Rail Bridge • The preferred access route to the converter station site via the B1121 on communities to the south of	The Applicant has carried out additional consultation (Jan to March 2026) and updates to **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk** through Examination which has included localised HGV caps for certain sensitive parts of the network. Key principles guiding route selection included minimising use of sensitive or constrained roads, avoiding residential areas where possible; and limiting abnormal loads to carefully managed routes. The specific locations addressed by SCC are considered as follows: **B1121 (South of Saxmundham, Benhall, Sternfield):**	Not Agreed

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			Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield. • The centre of Saxmundham that is constrained by a historic crossroad layout. • B1121 through Sternfield to Friston which has pinch points and bends. • B1119: Saxmundham to Leiston (S-RL7): • The landfall site which is constrained with regards to access as the surrounding roads are unsuitable for HGVs and AILs including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.A12 Seven Hills to Lowestoft (includes S-RJ1, S-RJ2, S-RJ3, SRJ4; S-RL1, S-RL-2, S-RL3, S-RL4) • The A1094: A12 Farnham to Aldeburgh (includes S-RJ9, S-RJ10, S-RJ11, S-RJ14; SRL10, S0-RL11) due to the superimposing of SPR EA1N, EA2 and Sizewell C (non-HGV) traffic. • B1069: A1094 Knodishall to Leiston (S-RJ13, S-RL12) • B1122: Yoxford to Theberton, Leiston to Aldeburgh and Theberton to Leiston There are certain routes which SCC considers should not have any construction traffic, this includes the B1119/B1121 Saxmundham which is already highly congested and not designed for NSIP traffic. The B1069 A1094 is an approved route for SPR, but cumulative impacts are becoming a concern. Notwithstanding SCC's position that an alternative access route using the Sizewell Link Road/B1121 should be used, SCC recognises that certain routes, such as the B1069/A1094 are the least worst option for the project in the context of the local road network not being designed for intense HGV traffic. However, the B1119/B1121 junction, the B1119 and the B1121 Sternfield are considered unnecessary to be used by the project and should be avoided due to the level of impact that will be caused by their use by the Applicant. SCC's LIR Chapter 11 [REP1-130] expands on these concerns. Despite these nuances, SCC maintains that the Applicant has underestimated impacts on the routes listed above taken from SCC's LIR, even it is accepted that certain routes are appropriate given the location of the project. Therefore, further assessment post-consent in the form of monitoring and reporting to the LHA is	The B1121 Main Road to the north of the new access to the Saxmundham Converter Station will initially be used for environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access, avoiding routing through Saxmundham and nearby villages. **Saxmundham Town Centre**: Routing through the town centre will be avoided after the initial mobilisation phase (see above, this will be completed early in the programme and limited in duration with up to 25 vehicles per day). The preferred western access route (Option 3) was selected following consultation feedback to avoid the northern and southern options that would have impacted the town more directly. The Applicant has committed to minimising general HGV traffic along this route (a maximum of 10 daily HGVs) as identified within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7. **B1121 through Sternfield to Friston**: This route is not proposed for regular HGV use. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 confirms that only light vehicles or monitoring traffic may use this route, and any use of constrained roads will be subject to further review with Highways Officers. **Landfall Site and A1094 / B1122 Roundabout (Aldeburgh):** The B1122 will only be used by Abnormal Loads under strict management as set out within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7. The A1094 / B1122 roundabout geometry was considered in the EA1N/EA2 examination, and the Applicant has committed to minimising general HGV traffic along this route (a maximum of 10 daily HGVs). Access to the landfall site will be limited and carefully managed. **A1094 and Cumulative Impacts (SPR EA1N, EA2, Sizewell C)**:	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			required to identify whether effects are worse than assessed and whether mitigation is required.	The Applicant recognises the cumulative pressures on the A1094. The traffic assessment includes embedded mitigation and coordination with other NSIPs. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 has been refined in consultation with SCC Highways to ensure cumulative impacts are appropriately managed. The Applicant responded to the points raised in SCC LIR in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**.	
3.15.2	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [REP6-038]** **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**	Assessment: Construction traffic routes	Routes such as the A12 and A1094 are subject to seasonal fluctuations due to events, tourism and agricultural activities which should be acknowledged in the assessment. Agree that seasonality doesn't need to be assessed. SCC recognises that data should be taken in neutral months. This is the industry standard methodology. Yet to agree in relation to junction modelling.	Following the meeting with SCC on 30 March 2026, the junction capacity modelling within **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [REP6-038]** included a Sensitivity Test to account for variations in baseline traffic levels due to seasonality. This has therefore been acknowledged within this part of the assessment work. The Applicant's position relating to the robustness of the original assessment work (including with respect to Baseline traffic surveys and traffic flows) remains unchanged. SCC also confirmed that this has been completed in accordance with the national standards i.e. the latest IEMA Guidelines. The Applicant recognises that the A12 is a strategic corridor and that the A1094 serves as a key route to Aldeburgh and the Suffolk coast, with variable traffic flows influenced by tourism and local events for example. The baseline traffic flows which have informed **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** are based on an agreed survey methodology with SCC Highways and are considered to be appropriate for the purposes of the assessment work. For example, had higher baseline traffic flows been adopted to consider seasonal fluctuations during the summer, then the percentage increases as a result of forecast construction traffic associated with the Proposed Project would have been lower than what was reported and assessed for the majority of the assessment criteria in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, resulting in fewer potential impacts being identified (except for the assessment of Driver Delay – see below). In terms of road congestion and junction performance, the assessment of Driver Delay was informed by queue	Agreed

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				length surveys, and the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. In addition, the majority of seasonal traffic is likely to be less peaked, but instead expected to be spread across the day and to be less impactful during the typical network and shoulder peak hours. Nonetheless, following feedback received for the assessment work in Suffolk, a sensitivity test has since been explored for the assessment of driver delay within Suffolk (as originally reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**) by reviewing the potential outcome of increasing the sensitivity level of each junction to driver delay by a single category (e.g. from medium to high) to reflect higher vehicle flows and queuing at the busiest times of the year. This results in seven junctions being assigned either a Very High or High sensitivity level for Driver Delay. The same conclusion is reached, that the likely impact of the Proposed Project on Driver Delay for all junctions within the study area is considered to be negligible or minor adverse (not significant) based on the increased sensitivity levels and small/negligible magnitudes of change identified for these junctions as a result of the Proposed Project. The assessment includes worst-case assumptions for construction traffic volumes, which provides a robust basis for impact evaluation by considering the busiest day of the construction programme. Therefore, whilst seasonal fluctuations in baseline traffic levels are acknowledged, the methodology adopted for the assessment work is considered to be robust by adopting peak construction traffic levels, rather than average or seasonal construction traffic levels which would be lower. Notwithstanding the above, this matter was discussed with SCC Highways on 30 March 2026 when it was agreed that whilst the Baseline traffic surveys (carried out in January/ February 2024) were appropriate for use (methodology and neutral month period of data collection was agreed with SCC in advance of the surveys), that it would nonetheless be useful to include a Sensitivity Test as part of the junction modelling to account for a potentially higher Baseline at other times of the year. The Applicant has therefore carried out a Sensitivity Test by identifying and applying a robust seasonality factor to the Baseline traffic survey results to reflect busier network conditions and then carrying this through to the other scenarios. The junction	

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				modelling methodology and results are reported within **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [REP6-038]**. The results of the junction modelling (including the Sensitivity Test) were also shared with SCC and ESC on 1 April 2026 for their review prior to Deadline 6. Nonetheless and to re-iterate, the Baseline traffic flows which have informed **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** are based on an agreed survey methodology with SCC Highways and remain appropriate for the purposes of the original assessment work. The Applicant's position on this matter remains unchanged from that previously summarised within **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** and **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. The above Sensitivity Test has been carried out for the purposes of the junction modelling in Suffolk only, following further consultation with SCC Highways. No further traffic surveys or seasonality adjustments are required to inform **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as agreed with SCC.	
3.15.3	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk** **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]** **Application Document 3.1 (J) draft Development Consent Order**,	Assessment: School bus routes	The Consultee requests that school bus routes are also considered when reviewing the public transport network as these routes would be sensitive to road closures and cumulative transport impacts. Whilst the Applicant has assessed public transport, SCC has a legal duty to provide school transport to certain students which has not been assessed by the Applicant, such as in terms of road closures. For instance, the Applicant has not assessed how a child living on a closed road would be able to access the bus. SCC expects a commitment in the CTMTP for school buses to be given access during road closures where needed. There are two primary schools in Benhall, two in Saxmundham, high schools in Leiston, Framlingham and Woodbridge and a new SEND school opening in Saxmundham which is more likely to require school transport as students are more likely to live further away.	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7, includes a summary of the main bus services within the study area. No road closures are planned as part of the proposals other than to accommodate abnormal loads, works at Benhall Bridge or the construction of bellmouths if required. Bus Route 521 would continue to operate when works are being carried out at Benhall Bridge, as set out in **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. Therefore, school bus routes are not expected to be impacted by the Proposed Project. SCC has confirmed its position as agreed following the additional consultation held during Examination, written responses and various document updates including to the Suffolk CTMTP. SCC has requested that liaison takes place and commitment is in place to ensure that statutory requirements to maintain school bus services	Not Agreed

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	submitted at Deadline 7			are maintained during periods of road closures. This includes any other potential road closures aside from that proposed. This is agreed by the Applicant.	
3.15.4	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 (F) Outline CTMTP – Suffolk**, submitted at Deadline 7	Assessment: HGV movements	The Consultee requires assumptions relating to HGV movements and worker numbers and profiles to be evidenced. SCC is prepared to accept the Applicant's assumptions on the basis that these assumptions are reflected in control measures by applying caps to vehicle movements based on those assumptions to ensure that the numbers do not exceed those assessed. The Applicant has not implemented vehicle caps as requested by SCC.	The existing daily profile of HGV movements on the surrounding highway network was originally reviewed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** using the traffic count data for the A12 in Suffolk as a guide. This indicated that HGV activity is typically stable between 8am-4pm, with slightly higher activity in the morning (between 8am-10am) and lower activity in the afternoon (between 4pm-6pm). The forecast HGV profile for construction traffic associated with the Proposed Project was therefore derived on this basis. However, HGV activity between 8am-10am is only expected to be marginally higher than levels between 10am-4pm, with a larger drop-off in HGV activity expected between 4pm-6pm. All construction HGVs associated with the Proposed Project will travel during the 10-hour window of 8am-6pm, with no HGV movements before 8am or after 6pm. The assessment work within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** assumed that a higher proportion of HGVs would travel during the AM network peak hour (8am-9am) to offer a robust assessment. Nonetheless, HGV movements will, in practice, be limited as far as possible so as not to travel during the traditional peak hours of 8am-9am and 5pm-6pm through the measures set out within **Application Document 7.5.1.1 (F) Outline CTMTP – Suffolk** submitted at Deadline 7. Therefore, the peak time for HGVs is more likely to be between 9am-10am, although as set out above, this level of activity is only expected to be marginally higher than at other times of the day. Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design (FEED) team based on the anticipated construction programme and construction activities at each access point. These have been split down by vehicle type (HGVs, LGVs and staff vehicles) for each individual day of the construction programme to allow peak forecasts to be identified, including for the single busiest day of the construction programme. There are almost 500 individual construction activities in total which have been separated by access point, with anticipated start and end dates for each activity, allowing total vehicle movements to be allocated across individual days across the programme based on the anticipated	Not Agreed

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				duration of each activity. The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** is based on the peak construction phase and the assumptions set out in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** relating to trip generation and trip distribution are robust.	
3.15.5	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]** **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**	Assessment: Study area	In view of the volumes of vehicle movements from cumulative schemes alongside Sea Link, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. The Council notes that there are junctions on the A12 under stress due to capacity particularly from the A12/A1152 Woods Lane Junction, Melton to the A12/A14 Seven Hills Interchange. To the north, the A12/A144, A12/A145 and A12/A1095 junctions have been areas of concern where capacity constraints while within acceptable flows may experience delays on side roads causing safety issues. SCC considers that it is likely that some, if not all, of these receptors will experience significant cumulative effects and so require assessment. Therefore, SCC does not agree with the study area of the assessment. SCC has detailed its views on junctions and roads affected by the project which are outside the study area in chapter 11 of its LIR [REP1-130] such as paragraph 11.125 and 11.171. SCC is particularly concerned about the cumulative pressures on traffic and transport receptors which have not been assessed due to being outside the Applicant's study area despite being impacted by the Proposed Development. Three junctions modelled and data a provided at D6 under review. Concerns raised about differences between outputs from SZC TA model and Sea link one. SCC provided a list of junctions of concern in Appendix A of [REP3-101] which require modelling in SCC's view. Some of these junctions lie outside of the Applicant's study area despite being impacted by the proposed project, further undermining the Applicant's study area.	The Applicant has carried out additional consultation during Examination, written responses and various document updates. This also includes following the additional cumulative note (**Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk)**) and the junction capacity modelling (**Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note**). The proposed study area for the traffic surveys and assessment within the ES was agreed with SCC as part of the transport thematic meetings. There are not expected to be significant construction worker movements on the corridors identified, including through Snape and Tunstall. This is demonstrated within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** which does not identify any significant effects on the highway network during the construction phase (based on peak construction traffic movements) with the proposed embedded mitigation and control and management measures in place. Construction workers are expected to travel to/ from the Proposed Project via the A12 to the north and south of the study area, rather than via the longer and more convoluted route through Snape and Tunstall via the B1078 and B1069 for example. The Applicant has responded to comments in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. These matters were also discussed with SCC during an in-person meeting held on 22 January 2026, including with respect to junction modelling, and consultation has continued to be held. The latest position with respect to the junction modelling and the scope of the junction assessments is set out within **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]** which was shared with SCC on 1 April 2026 and submitted at Deadline 6. This includes scenarios with and without cumulative schemes.	Not Agreed

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				Notwithstanding the above, SCC does not consider this item to be agreed.	
3.15.6	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7 **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**	Assessment: Methodology/ Receptors/ Sensitivity Levels	The Consultee suggests that sensitivity levels should be based on data/ evidence rather than professional judgement where possible. SCC detailed these concerns in its LIR such as paragraph 11.161 [REP1-130]. The main areas of concern where SCC does not agree with the Applicant's methodology and sensitivity levels are B1121 Benhall and, if used by light vehicles, B1069 Knodishall and B1122 Abbey Road Leiston. SCC has repeatedly requested further sensitivity tests which the Applicant has not engaged with SCC on. For junctions, SCC set out junctions of particular concern which require updated sensitivity tests in Appendix A of [REP3-101]. This has not been carried out by the Applicant. Where assumptions are made with assessments, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, and assumptions made for the sensitivity of receptors. The Council is concerned that the threshold for the sensitivity in a number of topics is set at a high bar and hence mitigation not considered necessary. Traditional assessments for DCOs such as the IEMA guidance are useful tool for assessing the construction traffic impacts albeit the focus is on regionally significant impacts. As a result, the fine detail of local impacts such as the small communities in Suffolk can, in SCC's opinion, be lost. At previous consultation stages the Council raised the use of this method as problematic given that it can often fail to fully assess the specific transport-related impacts of development. The IEMA guidance is one method of analysing the impacts in terms of risks to receptors. However, it is considered to be a coarse tool which does not sufficiently allow for factors such as junction geometry, design guidance (e.g. and most importantly the changes in traffic and driver behaviour. Assumptions made for strategic roads considered in the Design Manual for Roads and Bridges may also not be applicable to local roads which will not have been designed to such standards and are unlikely to have facilities for pedestrians found on such roads. SCC consider this has been the case with the Sea Link assessment where sections of road have been treated as uniform when there are significant differences in sensitivity. This impact can have a major impact on such small communities. An example would be the B1121 from the A12 south of Benhall to the A12 at Dorleys Corner. This, in SCCs opinion, forms a number of discrete sections. Other locations where SCC's	Sensitivity levels have been based on data where possible (e.g. collision data for Road Safety and queue length surveys for Driver Delay) and supported by (rather than relying on) professional judgement where necessary. Further details are provided below as requested. The assessment work within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** follows the 2023 Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement, which is considered to be appropriate for informing the methodology and sensitivity levels derived. Five different Tables to categorise sensitivity levels across the receptors within the study area have been identified, using quantifiable criteria where possible. This has resulted in a range of sensitivity levels being assigned including Medium and High for the most sensitive receptors and assessments. Therefore, this is considered to offer both a reasonable and proportional approach to the eight categories of assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, which considers 13 road links, 14 junctions and 17 Public Rights of Way (PRoW) and four walking/ cycling routes, within the agreed study area. Further to the above, the approach taken for identifying road link receptors and assessing impacts on severance, pedestrian delay, non-motorised user amenity and fear & intimidation is considered to be consistent with the approach taken by SPR within the EA1N/ EA2 ES'. For example, a similar number of links have been assessed, for similar lengths between key junctions. Furthermore, the sensitivity levels assigned for road links within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for the aforementioned assessments is largely comparable to those adopted for Sizewell C and EA1N/ EA2. Whilst some receptors have been assigned lower levels of sensitivity, the majority are of a similar level and some receptors have conversely been assigned higher levels of sensitivity. The study areas are also different, which influences the extents and characteristics of the links included, particularly for the A12. In addition, **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** assesses the potential impacts of the Proposed Project	Not Agreed

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			opinion differs with regard to sensitivity tends to be the small settlements on B roads, for example Benhall, Sternfield, Kelsale cum Carlton, Friston, and Knodishall.	on severance, pedestrian delay, non-motorised user amenity and fear & intimidation at road junctions, whereas the other DCOs do not appear to. The sensitivity of receptors for Road Safety was based on Personal Injury Accident data obtained from SCC for the most recent five-year period (at the time of the assessment), which includes all user types including vulnerable users. The Applicant highlights that the collision record presented by SCC within their LIR is representative of that presented within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The assessment of Road Safety was also based on the worst-case scenario; the single busiest day of the construction programme in terms of construction traffic levels and no significant effects were identified. The Applicant has responded to SCC's recent comments (as raised within the SCC LIR) in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, which includes considerations relating to the study area, sensitivity of receptors and the traffic and transport assessment. SCC confirmed that this is now agreed following the response below, as well as following the additional consultation held during Examination, written responses and various document updates. The only exception for this is the matter of assessing sensitivity for the B1121 Main Road through the village of Benhall.	
3.15.7	**Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]** **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project**	Assessment: Junction modelling	The Council considers there to be a need for junction modelling to adequately assess the project's impacts particularly for the purposes of assessing delay. This point is also relevant where junctions are impacted by cumulative schemes. It is noted that the Applicant has only assessed delay at junctions in terms of the IEMA guidance, not through modelling. A concern with the Applicant's assessment is that by only considering delay at two or more limbs this creates a situation where impacts will only be noticeable at crossroads and not where the main route is not constrained by the need to give way. Three junctions modelled and data a provided at D6 under review. SCC has not been able to complete its review by the end of examination; however, the review will be completed imminently and will be sent to the SoS once available. Preliminary comments are provided in what follows:	Junction capacity modelling has been carried out as reported in **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**. Further details are set out below. The Applicant has carried out junction modelling as requested. The Applicant held a further meeting with SCC and ESC on 30 March 2026, and the junction modelling outputs were subsequently shared with them on 1 April 2026. This included junction modelling for the A12/ B1121 Main Road junction (to the south of Saxmundham), the A1094 Aldeburgh Road/ B1121 Aldeburgh Road junction and the A1094 Aldeburgh Road/ B1069 Snape Road junction. The junction modelling includes a Sensitivity Test, to consider potentially higher Baseline traffic flows at other times of the year driven by tourism related traffic peaks in summer months. The junction modelling also includes scenarios with and without cumulative traffic. The junction modelling has been submitted at Deadline 6	Not Agreed

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	Cumulative Effects [APP-060] **Application Document 7.5.1.1 (F) Outline CTMTP – Suffolk**, submitted at Deadline 7		Concerns exist about differences between outputs from SZC TA model and Sealink one. The modelling for the A1094/B1069 Snape, this clearly shows that the junction is over capacity when considering future development and SCC is concerned that the Applicant does not consider that this warrants mitigation. Moreover, the modelling data shows that at least for the A1094 / B1069 Snape junction that the cumulative impact of all NSIPS moves the network peak to 0700-0800	within an updated version of **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]** to provide a summary of the junction modelling scope, methodology and results. The junction capacity assessments carried out pursuant to discussions with SCC Highways demonstrate that the Proposed Project will not have a significant effect on the operation of key local junctions and that the conclusions within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]** are valid and robust. The A12/ B1121 Main Road (South) and A1094 Aldeburgh Road/ B1121 Aldeburgh Road junctions are expected to operate within capacity with and without the Proposed Project. Whilst the A1094 Aldeburgh Road/ B1069 Snape Road junction is expected to operate over capacity, this is the case both with and without the Proposed Project. Additional mitigation has nonetheless been identified to manage construction worker traffic through this junction, secured within the updated version of **Application Document 7.5.1.1 (F) Outline CTMTP – Suffolk** which was submitted at Deadline 7. No further additional mitigation is considered to be necessary following the junction modelling. Notwithstanding the above, SCC does not consider this item to be agreed.	
3.15.8	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Assessment: Scope of assessment	The Consultee noted that the B1122 from Yoxford through Leiston to the B1353 at Aldringham is not included as a road link (paragraph 2.8.6.3 of the PEI Report).	The main access routes for the Proposed Project during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are anticipated to accommodate circa 97% of all construction vehicle trips associated with the Proposed Project. The overall routing strategy is designed to minimise construction vehicles along alternative less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston). The B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by cable drum abnormal vehicles under careful management as set out within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7. Otherwise, this route will not be used by HGVs to avoid	Agreed

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				construction traffic passing through Leiston and Coldfair Green and the Proposed Project is not therefore expected to have any impacts on this route. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates.	
3.15.9	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Assessment: Collision Data/ Rates	The Consultee challenged the approach taken for calculating collision rates in Table 2.0.24 of the PEI Report (e.g. collision data, description of links and road types).	Collision rates have been calculated based on the traffic flows derived from the 2024 traffic surveys and the number of collisions which occurred along each road link based on the Personal Injury Accident (PIA) data obtained from SCC. The collision rates have been calculated in billion vehicle miles for road links to provide a comparison with national road safety statistics provided within Road Casualties Great Britain (Department for Transport, 2024). Further details of the road links including their locations, number of recorded collisions, baseline traffic flows (2024 AADT), lengths (in miles) and road types (e.g. rural or urban) have been provided to inform this exercise, including the supporting calculations to derive the collision rates. A High level of sensitivity was assigned to several road link receptors, informed by the collision rates, to provide a robust approach to the assessment. Further details of the methodology are contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The Applicant also highlights that the collision record presented by SCC within their LIR is representative of that presented within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates.	Agreed
3.15.10	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Assessment: Methodology - Scenarios/ Peak Periods	The Consultee recommends flexibility regarding the assessment year in case the project programme changes. To be clear, that flexibility cannot extend to increasing the numbers of construction vehicle above what has been assessed.	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** assesses the peak construction phase which represents 2028 based on the current construction programme and the highest total annual forecast construction traffic movements. Flexibility has nonetheless been included as part of the assessment work to assess alternative peak years (such as 2027) for localised parts of the network where required, to provide a robust assessment. This is identified within Tables 7.25 to 7.31 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** which show the peak construction traffic flows which have been assessed	Agreed

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				across different parts of the highway network and when these are expected to arise. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates.	
3.15.11	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Assessment: Average vehicle occupancy factor	The Consultee requests further evidence to support the proposed car occupancy figure for construction staff, or the occupancy level should be reduced. Data from similar projects in Suffolk suggests a car share occupancy of 1.5 is optimistic. Whilst SCC does not accept that 1.5 is achievable for all parts of the project, SCC would accept this as a project wide value subject to monitoring, reporting and a commitment to take action if exceeded within the OCTMTP.	An average vehicle occupancy factor of 1.5 construction workers per vehicle has been adopted for the site-based construction staff, which is considered to be reasonable, yet robust, given that all staff have been assumed to travel by vehicle (rather than other modes) and that a formal Car Share Scheme will be implemented to match potential car sharers. This therefore represents a lower occupancy figure than the original factor (2.0) as requested by SCC. Further details are provided below in support of this approach. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes measures to encourage construction workers to travel by alternative means to the single occupancy vehicle where possible. A Car Share Scheme will be implemented and managed by the Transport Co-ordinator, to match potential car sharers and to help staff identify any colleagues who could potentially be collected along their route to/from the Site. The car share database will be available to staff that have signed up, to allow them to identify their own potential matches. Car sharing staff will be given preferential parking provision as an incentive to reduce single occupancy (and therefore overall) car travel to the construction compounds. Therefore, it is considered that the occupancy value of 1.5 is achievable with these measures in place. It should also be highlighted that the assessment carried out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** offers a robust approach as it has been assumed that all staff would travel by car (rather than other modes). Therefore, the average vehicle occupancy factor of 1.5 construction workers per vehicle is considered to be robust on this basis. In addition to the above, **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes an internal minibus service as a measure to transfer workers around the site and to reduce vehicle trips on the surrounding highway network. There would be the opportunity for this to also transfer construction workers to and from Saxmundham railway station, which is	Agreed

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				located a circa 1.2km walking distance to the north of the proposed site access (S-BM09) on the B1121 Main Road. This would both encourage and increase the viability of rail travel amongst construction workers, reducing vehicle trips on the surrounding highway network. Again, this demonstrates that the approach taken in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** is robust, given that all staff have been assumed to travel by car as part of the assessment work. In addition, following a meeting with SCC on 30 March 2026, it was agreed that an average vehicle occupancy factor of 1.5 construction workers per vehicle is typically exceeded for works on cables and overhead lines due to working patterns where construction workers travel together in vans, which is standard practice. The Applicant will also aim to achieve higher vehicle occupancy levels for workers at the Converter Station and Substation sites through the measures within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 and the Applicant's commitment to explore block booking accommodation and providing travel to sites as a mechanism to influence travel behaviour. SCC has confirmed that this is now agreed following the meetings on 30 March 2026 and 22 April 2026 and the recent updates to the Suffolk CTMTP. A request was made by SCC to the effect that car occupancy becomes subject to monitoring and enforceable, with wording to the effect contained in the Suffolk CTMTP. This is captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7.	
3.15.12	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Assessment: Proportional change in HGV movements	The Consultee requests that proportional change in HGV movements is also considered as part of the assessment work (e.g. when the 30% threshold is applied to determine magnitudes of impact based on proportional increases in traffic levels)	Agreed, the proportional change in HGV movements is considered in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for the applicable assessment criteria as shown in Table 7.10. SCC has confirmed that this is now agreed.	Agreed
3.15.13	**Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**	Assessment: Driver delay from TTM	The Consultee suggests that driver delay could also arise as a result of Temporary Traffic Management (TTM) which should be considered. This has not been assessed as requested. The Applicant accepts that the diversion routes shown on the Access and Rights of Way plans are not agreed with the LHA and further engagement is required to reach agreement. This will be managed through the permit	Temporary Traffic Management (TTM) measures will be required to accommodate the construction of each of the access points, which could entail temporary traffic lights or stop/go signage, road/lane closures and diversions, and restrictions to pedestrian access and car parking. However, with the exception of the temporary closure of Benhall Rail Bridge which has been considered and assessed within **Application**	Not Agreed

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			process such that diversion routes will require SCC's agreement. Whilst it is accepted that the process of closing roads and identifying diversions is acceptable, SCC is concerned that the impacts of road closures on local communities have not been assessed. Impacts may also be felt in terms of mental health, tourism, socioeconomics and other types of impact.	**Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055],** the exact form of TTM for these works is unknown at this stage. Where practicable, the Applicant will inform other relevant stakeholders (e.g. Royal Mail, East of England Ambulance Service NHS Trust) of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest possible opportunity. Further details will be included within the Detailed CTMTP to minimise impacts (including with respect to driver delay) when this is prepared. SCC requested that the commitments are put in writing to ensure that permits are requested from the Local Highway Authority. Other providers including Royal Mail, East of England Ambulance Service, NHS Trust will be informed of proposed TTM resulting from permits agreed with SCC. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates. The Local Authority will be informed of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest opportunity. Updated wording is captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7.	
3.15.14	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Assessment: Walking, Cycling and Horse-Riding	The Consultee requests that horse riders are also considered, both as users of the road network and public bridleways of which there are several within the sites and preference areas. SCC recognises that these impacts have been considered in the Applicant's assessment but considers that mitigation is required.	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** includes an assessment of PRoW diversions and closures including bridleways, as well as an assessment of the highway network in terms of Severance, Non-Motorised User Amenity and Fear & Intimidation which applies to all users. **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** sets out measures to manage PRoW through the construction and operational phases of the Proposed Project, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7. In addition, **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes measures to minimise the impacts of construction traffic on the road network. Therefore, all users of the road network and public bridleways (including horse riders) have been	Agreed

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	Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk, submitted at Deadline 7			considered by the assessment work and the supporting management plans. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates.	
3.15.15	**Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**	Assessment: Methodology - General	The Consultee requests that the assessment methodology for environmental effects, as set out in the Sizewell C Project 'Fourth Environmental Statement Addendum' [REP7-030] and [REP7-032], including categorisation of links and magnitude of impacts, should be considered. SCC does not agree with certain deviations from SZC's methodology, particularly in terms of reduced sensitivity ratings and lower estimation of impacts.	The assessment methodology for environmental effects within **Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** follows best practice guidance from the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement, which is considered to be appropriate for informing the methodology and sensitivity levels derived. Five different tables to categorise sensitivity levels across the receptors within the study area have been identified, using quantifiable criteria where possible. This has resulted in a range of sensitivity levels being assigned including Medium and High for the most sensitive receptors and assessments. Therefore, this is considered to offer both a reasonable and proportional approach to the eight categories of assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, which considers 13 road links, 14 junctions and 17 Public Rights of Way (PRoW) and four walking/ cycling routes, within the agreed study area. Further to the above, the approach taken for identifying road link receptors and assessing impacts on severance, pedestrian delay, non-motorised user amenity and fear & intimidation is considered to be consistent with the approach taken by SPR within the EA1N/ EA2 ES'. For example, a similar number of links have been assessed, for similar lengths between key junctions. Furthermore, the sensitivity levels assigned for road links within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for the aforementioned assessments is largely comparable to those adopted for Sizewell C and EA1N/ EA2. Whilst some receptors have been assigned lower levels of sensitivity, the majority are of a similar level and some receptors have conversely been assigned higher levels of sensitivity. SCC has confirmed that this is now agreed following the response above, as well as following the additional consultation held during Examination, written responses and various document updates.	Not Agreed

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3.15.16	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Development Consent Order: Extended working hours and HGV delivery hours	As Local Highway Authority ("LHA"), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on roads used for recreational purposes and the uninterrupted impacts on local communities. The application appears conflicted stating that HGV deliveries will not be permitted on Sundays and Bank Holidays but then placing a limit of 30 HGV movements for a list of allowable construction activities. The Council has set out its objections to the proposed core working hours, including timings of HGV movements, and the Applicant's justification of its position, in its representations submitted into the examination [REP1-130] [REP2-062].	The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP. See Ref 3.15.1 above for the Applicant's latest position on construction working hours. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes a commitment that no HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed in Section 7.4), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays. The inclusion of limiting HGV movements on Sundays and Bank Holidays is not intended to contradict the general restriction but rather to allow for essential, low-impact activities that support the overall delivery schedule. The Traffic and Transport assessments, including those in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, have considered these extended hours and associated vehicle movements. The assessments conclude that, with the proposed mitigation, no significant adverse effects are anticipated. Nonetheless, the Applicant has committed to ongoing dialogue with the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination. SCC has confirmed that this is now partially agreed. The matter relating to HGV deliveries is Agreed. The item relating to working hours is Not Agreed.	Not Agreed (with exception of HGV deliveries which is agreed)
3.15.17	**Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 9.83 (B) Code of**	Development Consent Order: Pre-commencement activities	Pre-commencement activities as defined within the Order fall outside the remit of the Construction Traffic Management and Travel Plan ("CTM&TP") and are therefore not managed. This has been a problem with other NSIPs in the delivery phase. If the Applicant intends that the control documents specified in Requirement 6 of Schedule 3 to the draft DCO should be applicable to pre-commencement operations, the wording of Requirement 6 will need to be amended to achieve this. As currently worded, it only restricts activities which would 'commence' the authorised development, but the term 'commence' is defined in the DCO so as to exclude all pre-commencement operations.	The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP. The Applicant confirms that pre-construction activities will be managed with the same environmental and traffic controls as those applied during construction, secured through the draft DCO, specifically Requirement 6 in Schedule 3 (**Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7). This is to ensure any pre-commencement operations must adhere to the final versions of the **Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074]** and **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7.	Agreed

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	Construction Practice [REP4-232] **Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074]**			**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 sets out clear measures to manage HGV movements during construction, which avoids sensitive areas such as Grove Road. Additionally, the Plan imposes strict caps on HGV movements on Sundays and Bank Holidays, limiting them to a maximum of 30 vehicles per day. The term "workers" primarily refers to construction personnel, where the working hours are clearly defined in the DCO (Requirement 7) It is expected that all visitors to Site will be involved in construction in some way. Monitoring and enforcement are embedded through: • **Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074]**; and • **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7 which outlines all mitigation measures and assigns responsibility for implementation and monitoring. Contractors will be required to develop task-specific Management Plans and report regularly to SCC. Requirement 5(3) already states all pre-commencement operations must be carried out in accordance with both the plans listed in paragraph 5(2), the outline management plans listed in paragraph 6(1) and the outline overarching written schemes of investigation listed in paragraph 14(1).Therefore, it is not considered necessary to update Requirement 6. SCC has requested clarification on what makes a temporary access in practical terms. The Applicant agreed to review and respond regarding Requirement 12(3). SCC confirmed that this item is agreed, subject to the definition of 'temporary access' as defined by Requirement 12(3).	
3.15.18	N/A	Development Consent Order: The New Roads and Street Works Act 1991	The Council is concerned by the disapplication of the New Roads and Street Works Act 1991 and considers that it should not be disapplied.	The Applicant raised this with SCC on 22 April 2026 and SCC confirmed that they have provided suggested redrafting for several sections of Article 13(3). The Applicant will need to review this and this item remains under discussion, but not agreed at the stage this SoCG has been submitted at Deadline 7.	Not Agreed

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3.15.19	**Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]** **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Development Consent Order: Traffic Regulation Orders	Paragraph 1: The application includes proposals for traffic regulation orders, including prohibiting vehicles on roads including B class ones. It is unclear over what duration this will be required and hence what the impacts on the road users, communities and other NSIPs will be. The Council would require robust justification before it can accept such restrictions. The principles stated by the Applicant do not appear to be included in the Outline CTMTP. Paragraph 2: The Council understands this Examination to serve as the consultation for the proposed Traffic Regulation Orders. The Applicant should therefore undertake meaningful and effective consultation with affected parties at this stage. The diversion routes in 2.7 Access Rights of Way and Public Rights and Navigation Plans [AS-011] have not been agreed with the Highway Authority. Some such as diversion B1121 traffic via the B1119 Rendham Road are unstable due to width, gradient and the level crossing. That for Grove Road, Friston showing use of Church Road is wholly inappropriate due to the narrow width and poor visibility at the junction with the B1121. Paragraph 3: Impacts cause by road diversions and closures from TROs and temporary traffic management measures should be assessed. SCC has particular concern over the impacts of such measures in relation to the B1119 and B1121.	The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP. Where Traffic Regulation Orders (TROs) are required, the following principles apply: • Short-term closures (1–5 days) may be needed for safety-related works (such as scaffolding for overhead lines); • Local diversions may last up to four weeks depending on the activity; • Full construction-phase restrictions will only be used if essential and subject to consultation with SCC Highways. Durations are indicative and will be confirmed in the Detailed CTMTP, to be agreed with SCC Highways. TROs are assessed based on the safety for workers and the public, minimising disruption to communities and businesses and avoiding cumulative impacts with other NSIPs (such as Sizewell C, EA1N/EA2). For restrictions on B-class roads, these restrictions are limited in scope (for example abnormal loads only), carefully managed (such as escorted, off-peak scheduling) and avoided or minimised where alternatives exist (including the B1122 where HGV levels will be minimised). The Applicant is committed to continued engagement with SCC Highways to agree TROs, coordinate with other NSIPs to share closures where possible and communicate clearly with communities ahead of any restrictions. Further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as no new or different likely significant environmental effects have been identified. Nonetheless, the Applicant welcomes further discussions with SCC Highways on this matter including consideration of additional measures for inclusion within **Application Document 7.5.1.1 (F) Outline**	Agreed (Paragraphs 1 and 3 of SCC's response) Not Agreed (Paragraph 2 of SCC's response)

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				Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 7 to further minimise any potential impacts during the Benhall Bridge works. As discussed during the transport thematic meeting with SCC Highways on 22 January 2026, this could include the potential for a temporary speed limit reduction on the A12 corridor between and including the A1094, B1121 Main Road (south) and B1119 junctions during the Benhall Bridge works, to alleviate SCC's concerns relating to road safety. Whilst this would not be included in the DCO as necessary mitigation, this could be implemented with agreement of the Local Highway Authority outside of the Order Limits. SCC confirmed that paragraphs 1 and 3 are now agreed following the response below, as well as following the additional consultation held during Examination, written responses and various document updates including the Suffolk CTMTP. This is on the basis that TROs are applied for proportionately and that details on their duration are provided when they are applied for. Updated wording will be captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 as discussed. SCC considers Paragraph 2 (consultation) to be Not Agreed.	
3.15.20	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** **Application Document 9.76.5 Change Request: Addendum to Volume 6**	Mitigation: Construction Traffic Management and Travel Plan: Emergency access	The Council has a concern that the additional traffic and works on the network may compromise emergency access to Sizewell B due to the proposed restrictions on vehicles but also the cumulative impacts of traffic and roadworks from all NSIPs. The application (such as in [APP-234]) shows the B1119 to be an HGV route which presents challenges to keeping the road available to emergency services without delay given the general unsuitability of the road for HGV movements without road improvements. The Council has a statutory duty to ensure emergency services are able to use the B1119 without delay and so must have certainty on this matter which has not yet been provided. SCC's final position is set out in 3.20.1 of this document which considers this matter agreed if the Applicant updates the REAC and DCO according to the wording provided by SCC [REP6-237].	Also refer to Ref 3.20.1 on matters relating to emergency access. The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP. This includes the inclusion of the daily cap of 10 HGVs through the B1121 Main Road/ B1119 Church Hill signalised junction within Saxmundham. The B1119 Saxmundham Road, a key route for emergency access to Sizewell B, will remain open to emergency services at all times. Works within the B1119 will be limited to new utility connections and environmental mitigation, which will be undertaken offline from the carriageway. Additional construction traffic along the B1119 Church Hill will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge	Agreed

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	Environmental Statement [CR1-055]			is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes a daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12). In addition, during any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham. A full cumulative traffic impact assessment has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**, including Sizewell C, LionLink, and SPR projects. The assessment concludes no significant cumulative effects on Traffic and Transport receptors. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes defined construction routes and traffic control measures to reduce the potential impacts of construction traffic associated with the Proposed Project. Further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as no new or different likely significant environmental effects have been identified. As above, following further discussions with SCC Highways, **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 was updated so that during any road closures of the B1121 for the Proposed Project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham.	

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3.15.21	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**	Mitigation: Construction Traffic Management and Travel Plan	The CTM&TP in the Council's view lacks rigorous controls on HGV routing and a cap on numbers in line with what is assumed in the assessments and has been accepted in previous DCO consents. Nor is there a commitment than can be enforced in terms of workers shift patterns that form part of the embedded mitigation. It is unclear if the definition of 'workers' includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these. LHA considers that the realistic worst case transport scenarios presented by the Applicant should be secured through caps on vehicle movements within the CTMP as per EN-1 5.14.14. SCC considers that its concerns with the assessment, including in terms of study area, underestimation of effects, sensitivity ratings and restricted junction modelling warrants further mitigation which could include a fund to deliver measures listed in response to 2CEInter1 [REP5-204], contribution to the A12 MRN scheme, adaptive management of vehicle movements and coordination with other NSIPs to ensure significant cumulative effects are avoided. SCC has not been able to review the outline CTMTP submitted at Deadline 7 and so has not been able to provide a full schedule of changes which would make the document acceptable in SCC's view.	The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP, which includes various daily caps of HGVs on localised parts of the highway network. The Applicant has responded to this comment within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. This matter was also discussed during the meeting on 30 March 2026: • SCC stated that HGV caps are expected to secure assumptions about traffic numbers used in the ES. • The Applicant disagrees that use of a traffic assumption in the ES is sufficient justification alone for HGV caps across the Proposed Project and that traffic numbers should only be capped where traffic is substantial (e.g. NPS EN-1 paragraph 5.14.14, 2023) and where those caps meet the tests in paragraph NPS EN-1 paragraph 4.1.16. • The Applicant's experience from other projects (e.g. SPR) highlighted programme risks associated with strict caps, indicating that agreeing caps across a project is not good practice from a perspective of the economic and efficient delivery of critical major infrastructure projects. • Unintended consequences of caps communicated to SCC, including informal HGV waiting to avoid breaching caps and HGVs taking less efficient routes to avoid caps in certain areas. This could result in additional adverse effects that would not be experienced if caps were not in place. • Limited ability acknowledged for the project to fully control all traffic movements. • In principle, the parties agree to disagree on the above, noting that this was also the position reached on BTNO. • However, as a compromise position, The Applicant has agreed to limited caps where the parties agree it would be beneficial to do so, even if these caps may not strictly meet the tests in EN-1. These caps include adding a cap of 10 daily HGV movements at Aldeburgh Roundabout to the Suffolk CTMTP, in addition to the cap of 10 daily HGV movements at	Not Agreed

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				the signalised junction in Saxmundham which has already been included. • The Applicant would ask whether the offered caps will enable agreement to be reached on the acceptability of controls at those junctions. To confirm, the following daily HGV caps are included within the latest version of **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 where these caps are secured: • A daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12) • A daily cap of ten HGV movements at the A1094/ B1122 roundabout junction within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with works at accesses S-BM01 and S-BM02). • Further to the above, the route along the B1121 Aldeburgh Road and B1121 Saxmundham Road through Friston (associated with access S-BM11) will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project. Further to the above, **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes a commitment that no HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays. The measures outlined within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7, will be overseen by a nominated Travel Plan (Transport) Coordinator who will monitor and enforce construction traffic controls associated with the Project. Measures are also included in the Outline CEMP, which include onshore control and management measures TT01,	

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				TT02, TT04, TT10, TT11 and TT12 relate to managing traffic. The Applicant has responded in **Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106]**. Notwithstanding the above, SCC considers this matter to be Not Agreed due to their concerns relating to overall caps on total movements.	
3.15.22	**Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Mitigation: Construction Traffic Management and Travel Plan: HGV details within CTM&TP	The Consultee states that the CTMTP should include details of HGV routing and numbers, travel planning measures and staff vehicle numbers.	SCC has confirmed that this is now agreed. Agreed, these details are included in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7.	Agreed
3.15.23	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7**Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Mitigation: Construction Traffic Management and Travel Plan: Worker Shift Patterns	The Consultee suggests that worker shift patterns (to spread traffic demand and avoid network peaks), worker movements are secured in the CTMP. This point is subject to review of the CTMTP submitted at Deadline 7. Moreover, the junction modelling data shows that at least for the A1094 / B1069 Snape junction that the cumulative impact of all NSIPS moves the network peak to 0700-0800. Measures are therefore necessary in the CTMTP to manage this new network peak. Other receptors which haven't been assessed in the level of detail may also experience a new network peak which has not been considered in the drafting of the CTMTP. Therefore, further mitigation is necessary	SCC has confirmed that this is now agreed following the response below, as well as following the additional consultation held during Examination, written responses and various document updates including the Suffolk CTMTP. Details of worker shift patterns, worker movements and peak HGV movements are set out within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7. It has been agreed (as part of consultation with SCC in March 2026) that caps can only realistically be applied to HGVs, rather than construction workers, which was also acknowledged by SCC during ISH3. SCC has accepted subject to the proviso that car occupancy controls are put in place, subject to monitoring and reporting to the Local Highway Authority. This will be captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 as discussed.	Not Agreed
3.15.24	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management**	Mitigation: Construction Traffic	The Consultee requires details of what actions will be taken to ensure compliance with the CTMP.	SCC has confirmed that this is now agreed following the response below, as well as following the additional consultation held during Examination, written responses	Not Agreed (subject to review of the outline CTMTP

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	and Travel Plan – Suffolk, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Management and Travel Plan: Monitoring and compliance	There should also be sufficient provision for monitoring and regular reporting of controls to the relevant highway authority. SCC understands that updates are being made at Deadline 7 to the CTMTP to secure this which SCC has not been able to review prior to the submission of this SoCG.	and various document updates including the Suffolk CTMTP. Section 8 of **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7**,** provides a summary of the mechanisms that will be implemented to ensure compliance with the document, as well as monitoring and reporting. A Transport Co-ordinator will be appointed by The Applicant to implement, manage, and develop the CTMTP at the appropriate time/ stage. SCC has requested that compliance is secured via monitoring, and that instances of non-compliance on vehicle occupancy and/or routing of HGVs is reported in monitoring reports supplied to SCC. This will be captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 as discussed.	submitted at Deadline 7)
3.15.25	**Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** **Application Document 9.76.2 Change Request Report [CR1-052]**	Mitigation: Walking/ Cycling Route Enhancements	The Consultee suggests that enhancements should be made to the PRoW network, by creating footpaths and cycleways in tandem with biodiversity enhancements. Sufficient land should also be retained within the Order Limits to secure PRoW-related measures. It is acknowledged that mechanisms for community benefit approach can be secured later in the process but this cannot act as a substitute for the Council's requested enhancement to offset the project's impacts.	The Applicant supports the delivery of community benefits associated with transmission infrastructure and welcomes suggestions for delivering community benefits. The Applicant would be happy to discuss the feasibility of these ideas during forthcoming community benefit engagement, which will be undertaken soon. However, The Applicant notes that community benefit is separate to compensation and mitigation. Government guidance states that *"Community funds are not a means of mitigating environmental or social impacts of infrastructure projects, which the project developer should address through the planning process."* In addition to the above, masterplanning is being undertaken in order to ensure effective coordination takes place with regard to the impacts on PRoW. For example, the Order Limits in the vicinity of Saxmundham Converter Station is crossed by two PRoW running north-south (PRoW E-491/005/0) and east-west (PRoW E-491/006/0). Whilst PRoW diversions are required, these have been designed and co-ordinated with other projects in this area (e.g. Lion Link) to minimise additional journey distances, re-join existing routes and improve route connectivity. The permanent diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to	Not Agreed

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				fully consider the long-term future of the site and to avoid the need for subsequent diversions. The Order Limits to the south of the B1119 have been widened in the Change Request submitted in November 2025. See **Application Document 9.76.2 Change Request Report [CR1-052]** for further details. Change 5 has increased the area for maintenance of the new hedge proposed to the south of the B1119. The ExA accepted the five proposed changes in this Change Request for examination on 5 December 2025. Whilst Change 5 allows more space along this strip of land to the south of the B1119, it should be noted that a permanent public right of way along this route is not identified as required mitigation, and would not comprise a compensation measure due in part to the spatial and temporal separation between it and the only affected PROW (Bridleway 491/010/0). Instead, the Applicant is proposing various different enhancement measures comprising permissive access through the landscaping in this area.	
3.15.26	N/A	Cost recovery	The Council requires adequate cost recovery in relation to highways costs incurred as a result of the project. Provision for this is included in SCC's version of protective provisions submitted at Deadline 7 which have been relayed to the Applicant. SCC understands that the two parties will engage after the end of examination with a view to reach agreement on the wording of protective provisions.	As SCC is aware, the Applicant has been agreeing and providing funding for SCC's cost recovery for several years and is in the process of finalising the post Examination Planning Performance Agreement for this to continue. This process is separate to and outside the DCO process.	Not Agreed (could be agreed if Protective Provisions are agreed)
3.15.27	**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	AIL movements, including special order routes	AIL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special Order weight restriction. The Council considers that the surveying and planning referenced by the Applicant should be undertaken prior to DCO consent. Not doing so poses a potentially significant risk to the project's timely delivery should it be discovered that no AIL special order routes are feasible on account of structures discovered to be unsuitable for such loads. At worst, these delays could cause various materially new or different effects to those reported in the ES to arise due to elongated durations of impact and delays to restoration and mitigation measures. The Council's concerns around AILs are set out in detail in paragraphs 11.137 to 11.151 of [REP1-130].	SCC has confirmed that this is now agreed following the response below, as well as following the additional consultation held during Examination, written responses and various document updates including the Suffolk CTMTP. While the ESDAL notification system is acknowledged and will be accessed, the Applicant is not relying solely on it to plan AIL movements. Instead, they are: • proactively engaging with SCC Highways; • surveying and planning AIL routes in advance; • committing to further detailed assessments during the construction phase; • The draft DCO includes flexibility to: • use alternative routes if required; • implement temporary works to enable safe AIL movements; and	Agreed

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			The Applicant should seek to implement resilient routes beyond the construction phase for AIL movements in the context of other nearby projects also requiring long-term access for AILs. Whilst SCC accepts that the Applicant will undertake AIL route assessments post-consent, it does so recognising that SCC's preference is to do these assessments at the earliest opportunity and that by delaying this until pre-commencement places a greater risk on the applicant that weak structures are identified on the network which prevents or delays AIL movements, or that SCC does not have the resources available at the time the applicant submits the assessments for review which would also cause delay. Currently SCC is reviewing assessments on the A12 between Ipswich and Lowestoft up to and including STGO3 loads (not special order) for SZC and expects other applicants to submit assessments to include routes for EA2, Bramford to Twinstead and Norwich to Tilbury in the next 12 months creating a significant package of work. It should be noted that SCC maintains its position that a viable AIL route to the converter station and substation has not been demonstrated.	• coordinate with other NSIPs to avoid cumulative disruption. The constraints on AILs highlighted by SCC are acknowledged and these will be strictly managed as set out within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7. This document sets out proposals for the management of construction-related traffic along the local highway network within the vicinity of the Suffolk Onshore Scheme during the construction period of the Proposed Project, in order to limit any potential disruptions and implications on the overall transport network. A final Construction Management and Travel Plan will be submitted and approved by Suffolk County Council under Requirement 6 of the draft DCO; providing final details on proposed vehicle routing and traffic management. The condition of the existing highway network is continually evolving and it is normal practice for an Abnormal Indivisible Load (AIL) contractor to need to navigate restrictions and constraints along a network between the point of departure and arrival. The restrictions affecting the network in Suffolk do not present abnormal or unusual challenges to an AIL contractor, who have standard practices overcome restrictions, and therefore the Applicant is confident that no alternative routes would need to be considered. Consent is required for AIL movements, with this consent being predicated on a survey of the route (as present prior to delivery) and proposals to overcome ay constraints. These consents are always sought after a DCO because they need to take into account the precise source of a delivery (which cannot be determined with certainty prior to decisions on the purchase of materials), timing of deliveries and the current condition of the highway network. It is not necessary or proportional to provide these details at the application stage. Regarding the AILs, and in accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase. These specialist engineers routinely work with developers and highways departments during construction projects to develop the detailed methodologies needed to successfully deliver AILs to sites. As discussed with SCC, there are various standard measures available to facilitate this. The specific methodology will depend on details available at later	

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				stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required). The Applicant will continue to liaise with SCC (Highways) and the Police on the proposed movement of AILs through Suffolk. Information on the proposed routes has been shared with stakeholders over a number of years prior to submission at a level of detail appropriate to the Proposed Project. The Applicant is in discussions with the Police and SCC on the level of funding necessary to cover the costs of managing and assisting the movement of AILs including the provision of escorts where deemed necessary by the Police. The Applicant welcomes the receipt of SCC's details on how it expects the assessment process to be undertaken, as received on 02/12/2025, and will look to engage with this process as the Proposed Project develops. Further to the above and as discussed during the transport meeting with SCC/ ESC on 30 March 2026, SCC acknowledged that structural assessments are typically carried out post-consent (as is the case for SPR and Sizewell) and it was agreed that these can therefore be carried out post-consent on Sea Link. SCC has requested that the full route of AILs along local authority roads (including the A12) from port of origin or the Strategic Road Network (SRN) to Proposed Project is included. This is captured within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7.	
3.15.28	**Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan –**	AIL movements and construction traffic routes: Benhall Railway Bridge	Aspects of this item are "agreed" by SCC and some aspects are "not agreed". **What is "Agreed":** To be clear, it is common ground that, given the current state of the Order Limits, the Applicant requires use of the Benhall Bridge for AIL movements and construction traffic. It is also common ground that the Bridge's current weight restriction will allow construction vehicles to use the access route. **What is "Not Agreed"**	SCC acknowledges the progress made following the additional consultation held during Examination, written responses and various document updates including the Suffolk CTMTP. SCC considers this to be largely agreed although matters relating to the wording of Options 1 and 2 remain under review. The Benhall Railway Bridge is recognised as a weight-restricted asset that may require temporary strengthening or overbridging to facilitate the crossing of abnormal indivisible loads (AILs).	Not Agreed (with exception of what is listed under "What is "Agreed".")

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	Suffolk, submitted at Deadline 7 **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**		What is not agreed is the assessment of the redistribution of traffic during closures of the Benhall Bridge and that repairing the bridge will only take a maximum of 28 days which is an overly optimistic assumption in SCC's view. These points have been made in detail in previous submissions such as [REP3A-031]. It is also not agreed that the wording in the outline CTMTP adequately secures the preference for reparing the bridge. SCC considers the mini-brdige option unacceptable. These matters are detailed in previous submissions with a summary provided in what follows: The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits. Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. With the current restrictions this route would not be resilient for long term access to the Saxmundham converter station site and the Council considers there are serious concerns regarding deliverability. As currently designed, this bridge would form critical infrastructure to deliver Sea Link, and potentially LionLink. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential. SCC has set out its concerns on this matter in response to the Applicant's position in Table 5A of [REP2-062]. These concerns include the lack of assessment regarding the 'mini-bridge' option, the lack of detail given on the feasibility of this option and how it would be delivered. Specifically for the closure of the B1121 at the Benhall Rail Bridge, diverted traffic would likely impact the B1119/B1121 signalised crossroads in Saxmundham and the A12/B1119	In accordance with the typical approach for large scale projects, the Applicant will work with heavy lift and AIL engineering contractors during the detailed design and construction phase to plan for the movement of AILs. The specific methodology will depend on details available at later stages, including the AIL types, their weights, what vehicles would be used (recognising that it is the axel weight rather than the absolute weight of the AIL that influences whether highway assets require strengthening), how these affect the highways asset, and the condition of the highways asset at the time (recognising that the highway could deteriorate or indeed be upgraded before the AIL crossings are required). However, the Applicant has had a number of positive discussions with SCC since the submission of the DCO application regarding possible methodologies for the strengthening of the Benhall Railway Bridge, if (following detailed assessment) this is necessary. The Applicant submitted a notification of proposed changes (**Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]**), which included additional land within the Order Limits at the Benhall Railway Bridge, to the ExA and has recently submitted a Change Request at Deadline 1A. On 6 December 2025 this Change Request was accepted into the examination. The Applicant has undertaken consultation with key stakeholders on this change to further advance discussions on the most appropriate methodology to employ, if necessary. These methodologies include the installation of a 'mini-bridge', which could be assembled and moved into place within the highway boundary under a weekend road closure. There also remains the option to permanently upgrade the bridge itself. The inclusion of the highway itself within the Order Limits would provide greater clarity over the consenting route for any such roadworks. Whichever bridge strengthening methodology is used, suitable Temporary Traffic Management (TTM) will be implemented (depending on the option taken forwards), to prevent the potential for traffic to queue back onto the A12. **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 sets out proposals for the management of construction-related traffic along the local highway network during the construction period of the Proposed Project, in order to limit any potential	

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			Rendham junction. The diversion of traffic from cumulative schemes should also be considered. The B1119/B1121 Mill Lane 4-way traffic lights in the centre of Saxmundham – over capacity already at peaks, will be even worse with diversion route, not anything you can do without knocking windows down. There is also a safety concern in relation to the Primary School on Brook Lane in terms of students crossing the road to get to school. The Council has provided further detail on its views on this matter in chapter 11 of [REP1-130]. Notably, the Council considers that there has been insufficient exploration and consideration of alternative solutions to access the site which do not use the B1121. The Council is also concerned with the lack of provision in the order limits for alternative solutions for the proposed access route, such as the construction of a new bridge, should the Applicant's proposed solutions be deemed unfeasible during delivery or should a new bridge be considered the least impactful solution. There is a lack of detail on the feasibility of the option to repair the bridge both in terms of the order limits being sufficient to facilitate the extent of the works, ancillary facilities including site accommodation and welfare and the impacts of those works. Engagement with a contractor should be sought to demonstrate the feasibility and likely impacts of these works. SCC requires that diversion routes will have to be agreed with the local highway authroity during closures of the Benhall Bridge. SCC has previously raised concerns with the proposed diversion route and the Applicant's assessment such as in [REP3A-031]. SCC will be required to refuse permits for work where suitable diversions have not been agreed.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	disruptions and implications on the overall transport network. Once a preferred and agreed option has been identified for transporting AILs, this report will be updated accordingly with any additional construction traffic management measures required to alleviate concerns. The Applicant will as a matter of course engage with all other relevant undertakers in order to identify asset interfaces and appropriate design responses and solutions, including Network Rail. It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that even a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time. The Applicant has responded to the additional points raised by SCC within Table 26.1 of **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**. These considerations were also discussed during the in-person meeting with SCC Highways on 22 January 2026, as well as further meetings in February and March 2026.	

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			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.		
3.15.29	**A Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Construction Vehicle Routing	The Consultee does not consider access for large or heavy vehicles through Saxmundham to be a viable option and is concerned about the likely impacts of increased traffic and disruption on communities to the south of Saxmundham.	The Applicant has carried out additional consultation during Examination, written responses and various document updates including the Suffolk CTMTP. This includes the inclusion of the daily cap of 10 HGVs through the B1121 Main Road/ B1119 Church Hill signalised junction within Saxmundham. The construction vehicle routing has been designed to minimise impacts across the highway network, as set out in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7, as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7**.** The southern access on the B1121 has been taken forward, which will minimise construction vehicles passing through Saxmundham. The B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by abnormal vehicles under careful management. Otherwise, this route will not be used by HGVs and the Proposed Project is not therefore expected to have any impacts on this route. The assessment set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** includes the routes from the A12 towards the proposed converter station on the B1121 south of Saxmundham. The construction access route will pass the northern extent of Benhall but will not pass the key services and facilities within the village. Following further consultation with SCC Highways between January and March 2026, **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 includes a daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12). In addition, during any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham.	Not Agreed

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				Notwithstanding the above, SCC considers this item to be Not Agreed.	
3.15.30	N/A	FEED - Road Safety Audits (RSA)	The Council requires a Road Safety Audit for access designs in accordance with the Council's guidance	The Stage 1 Road Safety Audits for all proposed new temporary and permanent accesses and the addition of the existing Wood Farm access off the B1119, have all been completed and designers' actions agreed with SCC for action at detailed design. The Stage 1 RSA process is therefore complete.	Agreed
3.15.31	**Application Document 2.13 Design and Layout Plans [APP-037]**	FEED - Access Layouts	The Consultee requests that bellmouth drawings show visibility splays (based on speed surveys and 's visibility guidance to reduce hedgerow impacts), forward visibility to traffic signals and consider characteristics of each location (rather than a generic design) including highway boundary info, topographic data, Order limits and swept paths Site specific designs are required. High level illustrative plans are not sufficient. SCC has concerns that lack of detail at this stage may result in the authority having to accept compromises later, for example in relation to retaining mature trees in visibility splays. Unless further detail is provided, this matter is unlikely to be resolved until the detailed design stage	Site specific designs have been provided. The Applicant has worked with SCC (Highways) to agree the locations and geometry of the proposed access points, including undertaking Road Safety Audits at Stage 1 for preliminary designs, which are complete and accepted by the highways authority. The location of accesses has been driven by safety, specifically considering visibility at the access locations, along with the need to access the project along its alignment. The Applicant has included proposals for vegetation removal and management at access points to ensure the project can provide the visibility required at the proposed accesses and this has been a specific focus of SCC (Highways) throughout the project development. However, the access designs are preliminary, and the Applicant is willing to work with SCC (Highways) and SCC (Landscape) to look for opportunities to minimise the impact on vegetation through the appropriate use of traffic management and other mitigations. Visibility splays and vegetation management have taken a precautionary worst case approach at this preliminary design stage. Visibility splays are shown on the bellmouth layouts in **Application Document 2.13. Design and Layout Plans – Suffolk [APP-037],** which are site specific designs. Therefore, the Applicant believes they are in agreement with SCC.	Not Agreed
3.15.32	**Application Document 2.13 Design and Layout Plans [APP-037]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments**	FEED - Construction Methodology	The Consultee prefers trenchless crossings of the public highway and suggests that it is not usually feasible to trench across a road less than 7.4m in width under two-way traffic control.	**Application Document 2.13 Design and Layout Plans– Suffolk [APP-037]** Drawing DCO/T/DE/SS/1306 has been provided to show the limitations of open trenching under two-way traffic control. The Applicant agrees that road widths below 7.4 m are not suitable where HGVs and or Buses are expected and roads under 6.4 m are not suitable where only light vehicles are expected. Where roads are narrower than 7.4 m it is proposed to have road closures and local diversions to undertake the works. These can be programmed to minimise impacts and will be discussed further with the local	Agreed

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	(REAC), submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7			highways authority. This has been set out within the REAC (**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 7) as well as the oCTMTP (**Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7). Due to the number and nature of the roads proposed to be crossed, the availability of suitable diversion routes and the limited duration of the closures to enable the single HVDC trench to be installed, the Applicant considers that the additional land take, construction works, nighttime working, materials, vehicle movements and increased permanent easement associated with undertaking trenchless crossings of the roads is not justified.	
3.15.33	**Application Document 2.13 Design and Layout Plans – Suffolk [APP-037]**	Access and crossing points	The Consultee requires further details of access tracks and crossing points to show these are safe to use with suitable length and width to allow two vehicles to pass. Clarity should be provided on the process for gaining technical approval for access designs under section 278 of the Highways Act which is separate from the discharge of requirements process.	These details are provided within the bellmouth drawings (**Application Document 2.13 Design and Layout Plans – Suffolk [APP-037]**) which have been supplied as part of the DCO. The crossing points and accesses have all undergone Stage 1 Road Safety Audits that have now been approved by the local highway authority. Technical approval for access designs will be sought through SCC's permitting scheme.	Agreed
3.15.34	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.	Vehicular movements during construction of Friston substation	The Council considers that detailed information is required regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.	**Construction Access Strategy** All construction traffic for Friston Substation will use a dedicated haul road from Snape Road (B1069), avoiding the B1121 through Friston village. The B1121 will only be used for minor works to existing overhead line towers, requiring minimal vehicle access. **Coordination with SPR Projects** The Friston Substation is included in the Proposed Project DCO to ensure a comprehensive consenting position. However, in Scenario 1 assessed in the EIA and reported on in the ES, it is expected to be implemented by SPR under their existing DCOs (EA1N and EA2). If SPR does not proceed, the Applicant will construct the substation under Scenario 2 using the same access and mitigation measures. **Traffic Forecasts and Management** Construction traffic forecasts for Friston Substation have been included in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** to ensure a robust assessment. If SPR constructs the substation, the actual traffic from the Proposed Project	Agreed

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				will be less than assessed. Traffic management measures are detailed in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7. **Cumulative Impact Assessment** Cumulative traffic impacts with SPR, Sizewell C, LionLink, and other NSIPs are assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.	
3.15.35	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** **Application Document 9.50 Supplementary Environmental Information – Cumulative Vehicle Emissions Assessment [REP1-123]** **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110]** **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**	Cumulative Effects: Impact on road network and mitigation	Below is a summary of SCC's concerns with cumulative effects, including assessment and mitigation, for traffic and transport. Please refer to SCC's previous submissions for SCC's full position (Chapter 11 of [REP1-130]) and additional details (such as [REP6-181], [REP6-184], [REP6-237], Tables 4 and 12 of [REP5-178] and [REP5-204]. **Point 1** The Council is also concerned about cumulative impacts on the road network and expects the proposals to contribute to significant effects with regards to traffic on the routes leading to, and in proximity to, the Suffolk Coast (and subsequent impacts on air quality, noise, and vibration), local housing, services, and labour supply. For example, use of the preferred access route to the converter station site via the B1121 could significantly impact communities to the south of Saxmundham, including Benhall and Sternfield, that rely on the town for shops and services. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this. The Council has set out its concerns regarding the Applicant's cumulative effects assessment in chapter 11 of its LIR [REP1-130] and does not consider the technical note on this assessment submitted prior to deadline 1 to address these concerns as set out in the Council's response [REP2-062]. The junction modelling provided by the Applicant at Deadline 6 only models three junctions and not the junctions listed as of concern by SCC in Appendix A of [REP3-101]. Several of these junctions will experience cumulative effects which is of particular concern to the Council. **Point 2**	The Applicant has carried out additional consultation during Examination, written responses and various document updates. This includes the additional cumulative note (**Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk)**) and the junction capacity modelling (**Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**). Further details are provided below. **Point 1** Potential cumulative effects with other developments proposed in the area have been assessed following cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This assessment has considered traffic, air quality, noise, and socioeconomic factors. Further assessment of cumulative vehicle emissions has been undertaken and is reported in **Application Document 9.50 Supplementary Environmental Information – Cumulative Vehicle Emissions Assessment [REP1-123]**. Since the submission of the DCO application, a further review of the feedback received, and issues raised on the cumulative assessment has been carried out. A Highways focussed meeting was held with SCC and ESC on 6 August 2025 to provide the Local Authorities with further details on the methodology and findings of the cumulative assessment work, including with respect to the anticipated durations of any potential cumulative effects. **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110]** provides further details on the methodology and findings of the cumulative assessment work, in cognisance of various construction programmes and potential overlaps of different projects, to further inform	Not Agreed

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	Application Document 7.10 Coordination Document [APP-363] **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]** **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**		The reliance of energy projects including SeaLink to use shift patterns to avoid worker trips during network peaks may, in combination with other projects, result in new peaks at the time workers arrive and depart. Insufficient evidence is provided to demonstrate that the combined impacts of the energy projects will not create a new network peak due to superimposition of shift changes. Transport impacts caused by new network peaks may not be lower than those assessed. The increased duration of impacts caused by new network peaks may also be a relevant factor when assessing the magnitude of these impacts. The Applicant should be proactive in working collaboratively with the promoters of cumulative schemes such as Sizewell C and the Local Highway Authority to monitor this phenomenon and minimise effects should new network peaks arise. A commitment to this should be made in a relevant control document such as the OCTMTP. **Point 3** The Consultee expects significant impacts (particularly on A1094 corridor and A12 as far south as A12/A14 Seven Hills roundabout) as a result of cumulative traffic (Sea Link, Sizewell C, Lion Link and SPR schemes) on routes leading to and in close proximity to the Suffolk Coast **Point 4** The Consultee suggests that Sizewell C has been underestimated (particularly on A1094 corridor) and requests a review of Sizewell C traffic flows. Peak year traffic data should be used in the cumulative impact assessment given close overlap of peak year assessments (2028/2029). Additional traffic survey data is being collected by Sizewell C which should be reviewed by the Applicant. **Point 5** The Consultee requests a review of SPR schemes, including if delivered sequentially over 5 years. **Point 6** The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables' EA1N and East Anglia THREE ("EA3") will still be within their construction phase and LionLink may also commence within this period. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the	and provide reassurance on the findings including with respect to mitigation. A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considered other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments. As set out above, a further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details that reinforce these conclusions. **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) [REP1-110]** provides further information on the cumulative assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. The initial findings were presented to SCC during a Highways focussed meeting held on 6 August 2025. A summary of these, as they relate to the B1121 Main Road, is provided below. The B1121 Main Road to the south of Saxmundham will be used by the Proposed Project, Sizewell C and LionLink. The cumulative assessment identified that there could be the potential for significant cumulative effects at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and Sizewell C. In addition, there could be the potential for significant cumulative effects on the B1121 Main Road to the east of the A12 and at the B1121 Main Road / B1119 Church Hill signalised junction as a result of the Proposed Project and LionLink. To provide further clarity on the findings, a Minor / Moderate cumulative effect could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the Proposed Project and other projects (such as Sizewell C and LionLink) overlapped precisely, otherwise the duration of any cumulative effects will be shorter. A Negligible cumulative effect (Negligible for the Proposed Project	

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			Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this. The total peak number of HGVs associated with this project is 346 two-way movements (173 deliveries). This exceeds Scottish Power (270 two-way movements) but is below Sizewell C's 500 two-way movements (early years) and 600 two-way movements (peak year). Preceding projects have undertaken cumulative impact assessment of the whole of the A12 between Ipswich and Lowestoft. In view of the HGV volumes above, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. At Preliminary Environmental Information Report stage, the Council reserved its position on the extent of the transport assessment scope awaiting sufficient data to make a judgement. The Council's primary concern is safety particularly at evolved junctions where delays joining the main carriageway may result in driver frustration and risk taking. The Council has commented on the Applicant's cumulative effects assessment in chapter 11 of its LIR [REP1-130] and does not consider the technical note on this assessment submitted prior to deadline 2 to address these concerns as set out in the Council's response [REP2-062]. The Council considers that a contingency fund should be secured to ensure that there is a route for mitigation to be implemented should effects be worse than assessed for the receptors SCC is particularly concerned about. This includes the B1121 Benhall, A12/B1119 junction, A12, Saxmundham signalised junction and A1094/B1069 corridor. SCC detailed what this fund could be used for in response to 2CEInter1 of ExQ2 [REP5-204].	coupled with Minor for the other projects) will occur for the remainder of the 60-month Sea Link construction programme. There would be no potential for a significant cumulative effect based on average (rather than peak) construction traffic levels for the Proposed Project, given this would result in a Negligible effect for the Proposed Project. In view of this, it is considered that the cumulative effect is more likely to be Minor and not significant overall, with a Negligible cumulative effect being experienced for the majority of the construction programme. This additional information presented above and during the thematic meeting with SCC on 6 August 2025 is considered to further validate the findings reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**, that significant cumulative traffic effects, as a result of the Proposed Project and other projects, are unlikely to occur. While the Authority has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other developments have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each project. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in ongoing dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated. It should also be re-emphasised that worst case peak levels of construction activity have been considered and the duration of these peaks will be for short periods. The Applicant has responded to SCC's comments on the cumulative assessment work (as raised within the SCC LIR) in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. These matters were also discussed with SCC during an in-person meeting held on 22 January 2026. **Point 2**	

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				As set out within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7**,** the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. This is a control and management measure which will be secured as part of the CTMTP (Schedule 3, Requirement 6 of the draft DCO) to minimise impacts during the busiest (and most congested) times of the day, particularly in terms of Driver Delay. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** does not identify any likely significant effects for the assessment of Driver Delay as a result of these proposed working hours which are designed to avoid worker trips during the network peaks. The assessments consider both the network peaks and the development peaks based on the construction traffic forecasts during the peak construction period and are therefore robust. It is acknowledged that the Proposed Project will be under construction alongside other schemes in the area which has been considered **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** for each discipline, including Traffic and Transport. Whilst there is the potential for construction workers associated with multiple schemes to create new network peaks by avoiding travel during the network peaks, this would be less impactful on road congestion and junction performance than the alternative scenario where construction workers travel during the network peaks. Nonetheless, the potential for any new peaks to occur will be subject to the programmes of other developments and likelihood and durations of any construction peaks overlapping. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** is based on a worst-case scenario, that the peak construction phase of each scheme would overlap. Further discussions have been held with SCC Highways during an in-person meeting on 6 August 2025 which reviewed these cumulative considerations in more detail. The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced **Application Document 7.10 Coordination Document [APP-363]** to	

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				minimise environmental and local community effects of the Proposed Project in combination with other projects. The Applicant has prepared **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]** following the meeting in August 2025 to provide further details on the potential for various construction peaks of different cumulative schemes to overlap. The Applicant does not consider there to be a need to provide any additional monitoring beyond the existing commitments included within **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk** submitted at Deadline 7 which has been updated throughout Examination, including following further meetings with SCC Highways in January, February and March 2026. A detailed CTMTP will be developed in accordance with the outline plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO. **Point 3** The consideration of cumulative effects as a result of committed developments is set out within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60]** based on **Application Document 6.4.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-238]**, which includes more than 25 developments including Sizewell C Nuclear Power Station, LionLink, East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The traffic and transport cumulative assessment includes the A12 to the south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are set out in the TAN which has been prepared for Suffolk (**Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**) in support of the traffic and transport chapter. The Applicant has also prepared **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]** to provide further detail and additional clarification on the original traffic and transport cumulative assessment work. This concludes that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully	

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				overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in paragraph 1.27 of the 2023 IEMA Guidelines for the Environmental Assessment of Traffic and Movement). **Point 4** The cumulative assessment of the Sizewell C – main development site includes construction traffic during the peak construction phase of Sizewell C. The trip generation forecasts have been taken from the Consolidated Transport Assessment which informed the DCO submission for Sizewell C, including Tables 8.7 and 8.8 which identified forecast traffic flows across the network during the peak construction phase for the weekday peak hours and across the day. These vehicle trips also include other elements of Sizewell C during the construction phase, including the Northern Park and ride and Southern Park and ride. It is therefore considered that a robust assessment has been carried out for the Sizewell C – main development site by considering additional vehicle trips associated with the peak construction phase of the development which include other elements of Sizewell C. Further details on this have also been provided within Section 3 of **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. The additional surveys being carried out by SZC are noted. During the meeting with SCC on 30 March 2026, SCC highlighted that traffic count data during summer months may be available from Sizewell C, but no parties on the call could identify whether there was any data available to the Proposed Project team through this route, or whether this could be compared to equivalent data at other times of the year. The parties agreed that the Proposed Project could not carry out additional traffic counts or additional modelling based on revised actual traffic counts prior to the close of Examination. **Point 5** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60]** includes a review and assessment of the SPR schemes i.e. East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. The Traffic and Transport cumulative assessment includes the SPR schemes as	

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				set out within **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038].** As requested, a worst-case cumulative assessment has been carried out by assuming that the peak construction phases of the Proposed Project would overlap directly with the peak construction phases of EA1N and EA2. Further details relating to this approach and the likelihood of various construction peaks overlapping directly are set out within **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. Nonetheless, if schemes were delivered sequentially, then peaks would be lower than those assessed within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60].** Therefore the traffic and transport cumulative assessment work remains worst-case. As part of **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7, the Transport Co-ordinator will liaise with other developers/ third party schemes including Sizewell C, Scottish Power Renewables (SPR) and LionLink, to provide co-ordination and to work collaboratively, including holding meetings to review construction programmes and discuss any measures that may limit cumulative traffic impacts. **Point 6** A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other major projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other schemes. This includes a cumulative assessment of Driver Delay and Road Safety for the road links and junctions within the study area. Whilst it is acknowledged that there will be a daily peak of 346 two-way HGV movements (173 HGV deliveries) regarding construction of the Proposed Project, this represents the forecast level of activity for the single busiest day of the programme and the assessment is therefore based on a very much worst-case short-term	

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				impact. This peak level of HGV movement drops to 230 daily two-way HGV movements (115 HGV deliveries) when excluding the busiest month of the programme. Furthermore, there is expected to be an average of 106 daily two-way HGV movements (53 HGV deliveries) across the entire construction programme, which represents 30% of peak assessed levels. Therefore, the level of forecast HGV activity which will be experienced for 59 months of the 60-month programme (98% of the construction programme) falls below the peak levels identified for Scottish Power and Sizewell C construction. Nonetheless, the Traffic and Transport cumulative assessment includes the A12 to the north and south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes. This has been based on the same Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement thresholds and assessment criteria, which have informed the assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, which includes assessments of Driver Delay and Road Safety at junctions. The potential for driver frustration and risk taking to arise at junctions is not expected given that the Proposed Project is assessed to not result in any significant effects with respect to Driver Delay at junctions, as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are also set out in the **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]**. A further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details in support of the conclusions. This provides further information on the assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. These findings were presented to SCC during a thematic meeting held on 6 August 2025. **Application Document 9.26 Traffic and Transport**	

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				Cumulative Assessment (Suffolk) [REP1-110] provided more detail about the methodology and findings of the cumulative assessment, in consideration of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance about the findings, including with respect to mitigation. While the Council has expressed concern that previous projects' mitigations are being presumed sufficient, the residual effects of other schemes have only been considered for Sizewell C, EA1N and EA2 based on their respective Environmental Statements where a potentially significant adverse effect was identified based on the initial assessment. Some overlap between the Proposed Project and other projects is inevitable due to the length of the construction phase (3-8 years) for each scheme. Therefore, co-ordination will be carried out to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation where necessary. This will then be agreed with EDF, SPR and National Grid Ventures, and apportioned appropriately. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated. SCC comments in the LIR are noted and the Applicant's responses to the comments are provided in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. Further consultation has also since been held with SCC in January, February and March 2026. The latest position with respect to the junction modelling and the scope of the junction assessments is set out within **Application Document 6.3.2.7.A (B) ES Appendix 2.7.A Transport Assessment Note [REP6-038]** which was shared with SCC on 1 April 2026 and submitted at Deadline 6. This includes scenarios with and without cumulative schemes.	

Table 3.16 Public Rights of Way

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.16.1	**Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]** **Application Document 9.45 Approach to Assessment of Public Rights of Way [REP1-119]**	Assessment Methodology for PRoW	The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES. This has made it difficult for the impacts on PRoW to be clearly interpreted by the public. SCC has asked for this in all correspondence, and it is contained in SCC's NSIP guidance. The examples of previous projects cited by the Applicant does not mean that the approach is best practice. It is understood that the DMRB and other guidance may not yet request the assessment of PRoWs to be its own ES chapter. However, a separate chapter would allow the assessment and its findings to be communicated with far greater clarity than the current sporadic approach spanning many documents allows. By consequence, IPs would be able to participate more effectively in this regard through improved accessibility to the assessment and its findings. A separate PRoW ES chapter would also ensure that PRoWs are assessed in a way which accurately reflects their use including the differences in use compared to the rest of the highway network. PRoWs serve purposes which go beyond purely transporting users, such as through being vital pieces of social infrastructure. These social functions are distinct from those which can be associated with other forms of highway. PRoWs have unique status and qualities in comparison to the rest of the local highway network and so require a distinct assessment approach. The division of the effects of the development on PRoW across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRoW user, they could then be significant.	It is the Applicant's view that the structure of the ES as submitted follows established practice in EIA, allowing for a full assessment of all potential impacts on PRoW where there is the potential for significant environmental effects. See **Application Document 9.45 Approach to Assessment of Public Rights of Way [REP1-119]** for the full justification. The Applicant has also responded to the points raised by SCC within Table 26.1 of **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**.	Not Agreed
3.16.2	**Application Document 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans [REP6-003]**	Mitigation Measures – Offsetting Residual Effects	See paragraphs 11.231-11.241 [REP1-130], Table A6 and B3 of [REP2-062] and responses to the Applicant's answers to 1TT16 and 1TT17 of ExQ1 [REP4-201] and Deadline 6 submissions for further details. An array of adverse effects, including significant effects, have been identified for PRoW as a result of the Suffolk Onshore Scheme. There is inadequate provision within	**Application Document 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans [REP6-003]** was updated at Deadline 6 to include a permissive path along the proposed permanent access to the Suffolk Converter station linking the B1121 and the existing PRoW network. Upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway would not be possible as these diversions connect into the existing PRoW network and not bridleways.	Not Agreed

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			the application to avoid adverse impacts and explore the creation of new links during diversions. PRoW enhancement and creation should be explored and implemented. Potential measures for improving PRoW include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway to join 010 and creating a footpath link (PRoW) alongside the Fromus crossing to link to the existing PRoW network. The B1119 is requested as mitigation recreation amenity and non-motorised user safety. The diverted route, which currently goes through open landscape with extensive views, will be impacted by the converter station. Views will be restricted and the permanent diversion route, will be close to the built form. This may discourage users from walking this route, as landscaping close to the facility will not be an affective screen. The request for a PROW nearer to the B1119 would aim to resolve this issue, as it is higher in the landscape and therefore vegetation screening will be more affective and the user experience enhanced due to not being routed so close the converter station. Also, the requested route offers an alternative route along some of the B1119 for non-motorised users to not use the carriageway, which has no footways, and due to the intensification of the roads due to construction, would be beneficial to highway safety. If this route was continued eastwards, it would connect to other PROW or quieter roads. Whilst the permissive route from the B1121 is welcome, further information is required as it needs to be signed similar to a PROW, have the same similar surfacing as PROW would have and we need an understanding of when the route may be temporarily closed (e.g. emergency works to facility), and if LIONLINK used the same route, would it close it for months/years for example, which effectively mean that this is not mitigation? SCC does not consider that residual effects have been adequately offset as far as possible. Potentially significant cumulative effects are identified and effects on users of the wider PRoW network have not been thoroughly assessed and may result in significant effects as a result	See Appendix A of **Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112]** for the Applicant's position on mitigation in respect of PRoW in response to 3GEN1. The Applicant has robustly applied the mitigation hierarchy throughout development of the Proposed Project in a way that has minimised the impacts on PRoW.	

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			of recurring disruption on the PRoW network from cumulative developments. The Applicant should engage with the Council to discuss the opportunities for PRoW creation to resolve this item. If offsetting cannot be achieved within the Order Limits, the Applicant should seek offsite offsetting in the local area which could be achieved by making a financial contribution to SCC to undertake PRoW creation/enhancement. SCC has provided		
3.16.3	**N/A**	Wording secured on permissive routes	SCC welcomes the commitment to provide a permissive path from the B1121 to the converter station site. SCC provided comments on commitment GG43 of the REAC to the Applicant in advance of Deadline 7 which SCC understands have been actioned to improve the commitment. On this basis, SCC accepts the revised wording. For information, a list of SCC's comments provided to the Applicant on GG43 is provided below: *GG43 - A permissive path will be created along the permanent access road into the Saxmundham Converter Station as shown indicatively on sheet 1 of 7 of the Access, Rights of Way and Public Rights of Navigation Plans (Application document 2.7.1)* . Understood. *The path will be opened for public access once the construction of the LionLink Converter station is complete except where National Grid requires a closure for maintenance purposes*. *Should the construction of Lionlink be delayed such that construction at Saxmundham Converter Station for Sea Link is complete before construction has started on the Converter Station for Lionlink, the permissive path would be open on completion of the Sea Link works and then closed for safety reasons for the duration of the Lionlink construction works.* Understood *The path will run from the access off the B1121, across the Fromus Bridge, to where it intersects with the westernmost section of the permanently diverted E-491/005/0*. Understood *Opportunities will be sought to extend the permissive path from the point of intersection with E-491/005/0 through the woodland planting north of the converter station to connect into the reinstated PRoW E-491/006/0.* Understood and would request that this path id designed to local highway authority PROW spec for user safety and experience. I.e. canopy heights, path widths	The Applicant has worked hard to identify and secure permissive paths at the Converter Station, with discussions with SCC informing this approach. The permissive path would be across land owned by the Applicant, with maintenance the responsibility of the Applicant. Detail on maintenance can be provided in the final PROWMP. It should be noted that maintenance of PRoW is often poor and the path being a permissive path does not mean maintenance would be less likely to secured. The Applicant has committed to signage on the permissive path at both ends, given the nature of the path being a relatively straight line following the access road, it is not considered necessary for there to be waymarking along the route, but the Applicant would be happy to discuss this in the finalisation of the final PROWMP post consent. The PROW team would see this strategy through the discharge of the final PROWMP, which also covers permissive paths. Any closures of the permissive path would be communicated as would any closure of a PROW, with signage erected informing of the closure wherever someone might join the route. It is not considered likely to be a frequent occurrence as it would only happen if substantial works were required, for example if a new transformer is required. Even then, closures would not be long term.	Agreed

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			and vegetation offsetting and planting types to avoid prickly plants). *The permissive path will be clearly signposted at both ends and will be accessible to walkers only due to the route over the Fromus bridge not being suitable for cyclists and horse riders.* It will also need waymarking along the route, to help people stay on the route and it would be beneficial for the local highway authority PROW team see and agree the signing and waymarking proposals prior to installation to ensure that a strategy is implemented that the public know and understand and is format that is locally used. *The permissive path will be located between the access road and the boundary planting except for where is crosses the Fromus bridge, where a pedestrian section of the bridge would be segregated using markings and/or tactile paving and/or delineation strips*. Who is maintaining the vegetation to ensure that the permissive route is kept clear and is looked after in a similar manner to PROW? *The permissive path would only be temporarily closed when major maintenance is required for either the Saxmundham or LionLink Converter stations(should the LionLink DCO be granted), when large loads may need to be delivered, or else where maintenance of the access road and associated vegetation is required. During any other periods of high activity on the haul road, when safety may be a concern, barriers and or path marshals would be provided.* How will closures be clearly communicated to members of the public? What will the process be, who will be involved? Understand that emergencies happen, however, what are the processes for planned and emergency work closures?		
3.16.4	**Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Mitigation Measures – Embedded Mitigation	SCC's requested changes to the Outline PRoWMP were submitted in [REP2-062]. There should be a commitment to keep Public Rights of Way open and available during the construction period as far as possible. This could be achieved through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRoW network, especially during the construction period. Appropriate wording to secure this was proposed by SCC in Table A6 of [REP2-062].	**Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** has been developed in consultation with SCC and ESC and sets out the measures to manage Public Rights of Way through the construction and operational phases of the Proposed Project. PRoW will be kept open wherever possible during the construction phase through the management measures identified. Diversion routes have been identified where any temporary PRoW closures will be required, to prevent the requirement for alternative routes to be used. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. The proposed diversion routes are subject to agreement with SCC as part of bringing forward a detailed PRoWMP under Requirement 6 of Schedule 3 of **Application**	Agreed

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			SCC welcomes the update to the PRoWMP to include the embedded mitigation measures requested by SCC and so considers this matter resolved. Other concerns with the outline PRoWMP are covered elsewhere in this table.	**Document 3.1 (J) draft Development Consent Order,** submitted at Deadline 7**.** Masterplanning is also being undertaken in order to ensure effective coordination takes place with regard to the impacts on PRoW. For example, the permanent PRoW diversions have been embedded into the master planning of the Proposed Project (including in consideration of temporary construction compounds), to fully consider the long-term future of the site and to avoid the need for subsequent diversions. It should be noted that no surveys of PRoW have been carried out as the proposed management and mitigation relating to PRoW as set out within **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** will be put in place irrespective of existing usage levels, to retain safe PRoW access for all users. Where required, the interface between the construction area and existing (or diverted) PRoW will be physically separated by fencing and gates to prevent PRoW users from encountering construction traffic. SCC PRoW officers have been consulted and attended thematic meetings, where engagement took place regarding potential PRoW impacts and mitigation. A schedule of meetings held is set out in Table 2.1 of this SoCG.	
3.16.5	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 7.5.9.1 (B) Outline Public Rights of**	Cumulative Effects - Impact on PRoW	The Council is concerned about the cumulative impact of this proposal with the other existing energy projects consented and proposed in this area on the PRoW network, where the lack of a single assessment approach for public rights of way, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRoW network to the north of Friston where there will be repeated temporary closures of PRoW that could overlap with temporary closures on the same PRoW required for the Sea Link project. The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects. The impact of temporary closures of PRoW should not be underestimated, as their value for local amenity could be severely reduced or removed during works. SCC does not consider that this has been adequately assessed. On a precautionary approach, SCC considers that offsetting measures should be sought as a result. Although SCC supports greater coordination between NSIPs to minimise negative impacts on PRoW, there are	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** assesses the cumulative impact of the Proposed Project in addition to other NSIPs. The assessment considers cumulative socio-economic impacts on PRoW and recreational routes within a 500 m study area from the Proposed Project's order limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. As set out in Table 13.43, the assessment of total inter-project cumulative effects for socio-economics, recreation and tourism has identified that East Anglia ONE and TWO Offshore have potential to result in cumulative effects upon four PRoW. The Applicant will co-ordinate PRoW closures and diversions with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects, with this commitment to be included in the update to **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. The chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in	Not Agreed

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	Way Management Plan – Suffolk [REP6-086]		concerns regarding the lack of detail from the Applicant on how these measures will ensure cumulative impacts will be adequately mitigated. The Applicant has not demonstrated how it will coordinate closures with SPR and so cannot rely on that as the sole mitigation measure to ensure significant effects do not occur. If the closures are not fully overlapped with that of cumulative developments, repeated/sequential impacts on PRoW will occur e.g. repeated closures/diversions as each NSIP comes forward. SCC does not consider that this aspect of impact has been fully considered or mitigated in the application which has been conveyed in various submissions such as responses to ISH 3 action points [REP6-184] and ExQ2 [REP5-204]. There will also be potentially significant effects on PRoWs which will be impacted cumulatively by Lion Link which are unlikely to be mitigated through coordination	aggregation with the Proposed Project, and therefore no additional mitigation will be required. The Applicant recognises the importance of local amenity and access to PRoW. In response to this concern, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRoW users, drawing on assessment from **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is also assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**. No significant adverse effects are identified with regards to human health and wellbeing. The Applicant has endeavoured to reduce impacts on PRoW wherever possible. An **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]** has been prepared as part of the DCO application. This has been developed in consultation with the relevant local planning authorities and provides details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. PRoW closures and diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm to reduce the potential for significant cumulative effects. The Applicant has considered the further comments from SCC with regard to the level of detail in terms of managing PRoW impacts between the NSIP schemes. It is emphasised that the relevant management plan is outline in nature. A detailed PRoW Management Plan will be developed in accordance with the outline plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO. There are three main PRoW interactions between the Proposed Project and SPRs projects. The first is at the site of the permanent access road to the Friston Substation which crosses E-260/017/0 and E-260/016/0. Although there are temporary diversions shown by the Applicant, these are unlikely to ever be required as this permanent access is currently under construction and will be in place before construction of the Proposed Project commences. As such there will be a single crossing point for each PRoW to cross the access for both project and, as such, no coordination will be required. The second interaction would have been in relation to E-260/006/0, however this PRoW has already been permanently	

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				diverted by SPR. As such, when this permanently diverted PRoW is crossed by the proposed project to install the HVAC cables, it will be treated in the same way as any other PRoW (temporary diversion then managed crossing with pedestrian priority) and no coordination with SPR will therefore be necessary. Lastly both projects will temporarily interact with E354/003/0 which connects to E354/002/0. Importantly though there is a spatial separation between the sections of crossed with the Proposed Project only interacting with E354/002/0 and SPR only interacting with E354/003/0. It is possible that each of these sections could be temporarily diverted or be subject to managed crossing at the same time, but because they are separated spatially, there would be no need/benefit in coordination. The worst case is that a user may need to use two temporary diversions on the same walking route. Given the above, although the Applicant has committed to coordinating with SPR it is no longer considered necessary and is certainly not needed to avoid significant effects on these PRoW.	

Table 3.17 Socio-Economics, Recreation and Tourism

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.17.1	**Application Document 9.120 Detailed Skills, Supply Change and Employment Plan [REP6-101]**	Engagement on Socio-economics and tourism / Skills and Employment Plan	The Council welcomes the opportunity to strengthen and support the growth of local businesses through their involvement in a project such as this. However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk. The Applicant should commit to ongoing collaboration and engagement with SCC within the DCO such as through a requirement for a detailed Employment, Skills and Education Strategy/Plan in accordance with 5.13.12 of EN-01. This is especially pertinent when it is known that this project is one of a series of projects being brought forward by National Grid in the locality and therefore will provide a far greater opportunity than a single project would. SCC notes that the Applicant's latest submissions confirm that it does not consider the submitted Skills, Supply Chain and Employment Plan (SSCEP) to operate as mitigation, and SCC therefore maintains that a bespoke and enforceable DCO mechanism is required to secure a mitigation-focused approach in the Suffolk context.	The socio-economic, recreation and tourism technical discipline have engaged in a series of thematic meetings with SCC and ESC. The thematic meetings provided an opportunity for the local planning authorities to raise questions and concerns as well as discussing important points of local context to inform the assessment. The Applicant is liaising with SCC, ESC and tourism organisations to seek their views on how tourism impacts can be minimised. This is detailed further in SE04. The Applicant has prepared **Application Document 9.120 Detailed Skills, Supply Change and Employment Plan [REP6-101]**. The Applicant did engage with SCC to inform development of the SSCEP prior to its submission at Deadline 6. In addition to this, the Applicant has provided detailed response and further commentary regarding SCC's points in relation to the SSCEP within **Application Document 9.136 Applicant's Responses to Third Written Questions** (please refer to 3SERT1), and within	Not Agreed

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			The Council notes the Applicant's position that the level of net additional construction employment expected to be taken up by local residents is low, on the basis that the roles required are specialised and that similar outcomes have been observed on other schemes. However, the Council does not consider that experience elsewhere can be assumed to apply in this case. The skills and employment context in East Suffolk is materially different from most regions due to the concentration of NSIPs, most notably Sizewell C, which is projected to employ a substantially larger construction workforce than is typical for energy NSIPs. The Council considers that it is not clear how the Applicant has accounted for the number, scale and temporal overlap of other infrastructure projects in the area, or the resulting prevalence and availability of specialised skills locally when reaching its conclusions on local employment uptake. Further detail on SCC's position is set out in the Local Impact Report [REP1-130] and the Council's Deadline 2 submission [REP2-062]. The project could benefit the local economy as a result of additional spend from a non-homebased workforce. The Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally and to ensure that economic benefits are retained within Suffolk wherever possible. SCC expects the Skills, Supply Chain and Employment Plan (SSCEP) to provide proportionate but clear information on workforce requirements across all phases of the project, including workforce numbers, skills, role durations and the anticipated split between home-based and non-home-based labour. SCC notes that the Applicant's latest submissions confirm that such information is not currently available and is not proposed to be provided as part of the submitted SSCEP; SCC therefore considers that enforceable post-consent commitments are required to ensure this information is produced and applied. This information is necessary to support coordinated workforce planning through SCC's Regional Skills Coordination Function (RSCF) and to manage cumulative labour-market pressures arising from multiple NSIPs in Suffolk, including impacts on the availability of skilled labour for other local industries and projects. The SSCEP should include a locally co-designed education and training approach developed with the RSCF, demonstrating how the Applicant will work with FE, HE and private training providers to align provision with project demand, address skills gaps and support inclusive pathways into employment. SCC notes that the actions included in the submitted SSCEP are predominantly limited to signposting	**Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter**, submitted at Deadline 7 (refer to Ref 9.4).	

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			and alignment with existing corporate programmes, and do not demonstrate how cumulative training demand will be coordinated or managed across overlapping NSIPs in Suffolk. This strategic approach is critical to ensuring that local labour participation is not limited by assumption but is actively supported through appropriate pipeline development. The SSCEP should also explain how engagement with providers will be coordinated to avoid duplication across concurrent projects, and how workforce, supply-chain, timeline and procurement information will be shared with the RSCF to support effective local planning and capacity-building. SCC notes that the SSCEP submitted by the Applicant was prepared without meaningful prior engagement with SCC or the RSCF and has not been substantively updated to reflect the feedback provided. In its Rule 17 response, the Applicant has confirmed that it does not consider the SSCEP to be required as mitigation, reinforcing SCC's concern that the document cannot be relied upon to manage cumulative labour-market impacts. In its current form, the SSCEP does not operate as mitigation for cumulative skills and labour-market impacts, relies predominantly on corporate social value activity rather than locally responsive measures, and lacks clear governance, monitoring and reporting arrangements to support effective delivery. SCC also refers to the proposed new DCO Requirement set out in REP6-237, which would secure a SSCEP as mitigation and provide a framework for workforce assessment, education and training coordination through the RSCF, supply-chain engagement, governance and monitoring. SCC considers this to be the appropriate mechanism to support an ongoing assessment of cumulative effects, to take account of the evolving skills and employment context in Suffolk, and to maximise the scope for employing local residents across the life of the project. SCC considers this mechanism to be necessary in light of the Applicant's stated position that the submitted SSCEP is benefit-focused and not intended to operate as mitigation. SCC confirms that its outstanding concerns in relation to both mitigation and assessment would be resolved if the Applicant were to either submit a sufficiently detailed SSCEP during the Examination, or submit an Outline SSCEP secured through the DCO with clear, enforceable commitments to provide a fully detailed version post-consent that addresses cumulative labour-market impacts and is agreed in consultation with SCC through the Regional Skills Coordination Function. SCC considers that either approach would ensure cumulative skills, employment and labour-market impacts are		

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			appropriately mitigated and that current assessment limitations are addressed. The Council also encourages the Applicant to consider legacy opportunities in areas such as the visitor economy, hospitality sector, and skills and employment of local residents arising from all elements of their development. However, the Council is clear that such legacy opportunities should not be treated as community benefits or discretionary enhancements, as they are directly linked to the management and mitigation of the project's cumulative socio-economic impacts. In the Suffolk context, legacy outcomes relating to skills, employment and supply-chain capability are necessary to address foreseeable workforce displacement, labour-market pressure and training capacity constraints arising from the concentration of NSIPs. These outcomes must therefore be planned, delivered and monitored through the SSCEP, where they can be secured as enforceable mitigation measures rather than voluntary commitments. Embedding legacy opportunities within the SSCEP is essential to ensure that skills and employment interventions respond to project demand, align with RSCF activity, and deliver lasting economic resilience for Suffolk communities.		
3.17.2	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**	Assessment Methodology - Including 500m Study Area for impacts on businesses	The Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme, to assess potential impacts to these organisations of the construction works and access routes. Impacts on businesses should be recognised not only in terms of direct effects through lowered visitor numbers but also indirectly through transport impacts impacting the transportation of staff and deliveries of goods, particularly fresh produce and perishable goods, may create logistical issues for businesses which should be recognised in the Applicant's assessments. SCC's concerns with the assessment of traffic and transport impacts are set out elsewhere. The Applicant should take a proactive approach in engaging with businesses to seek their views on how they could minimise impacts on them and should seek to coordinate with other cumulative schemes where businesses may be affected by the delivery of multiple projects. The Study Area for impacts on businesses, tourist attractions and community facilities is within 500m of the Order Limits of the Suffolk which the Council considers to be quite restrictive. The logistics of businesses outside this area may be impacted by increased traffic from this project in combination with cumulative schemes. There may be potential for amenity	Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment considers impacts on these receptors within a 500 m study area from the Proposed Project's Order Limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. Where appropriate, receptors located beyond 500 m of the Suffolk Onshore Scheme have also been included in the assessment to allow for assessment flexibility. The assessment concludes that there are no businesses within the Study Area which would be significantly affected by the land required for the Suffolk Onshore Scheme or to which access would be required. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** concludes there are no roads assessed that would experience significant severance effects during construction. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within, and beyond, 500 m of the	Not Agreed

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			impacts on businesses outside the study area through increased traffic and noise. The Council recognises that the Applicant's assessment has been produced according to the DLUCH Appraisal Guide. However, the Council stresses that this is guidance and should be treated as such. Contextual factors should be considered when forming a best-practice approach to this assessment. The Council considers that the unique cumulative context of the proposed development justifies a more thorough approach to assessment. Particular aspects of this context which warrant a more thorough approach include the present high degree of uncertainty over the future actual socioeconomic effects of Sizewell C and the effects of future projects currently in the formative stages but likely to overlap with Sea Link.	Order Limits. This has been assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. In light of the topic -specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, landscape & visual or noise that would materially affect health and wellbeing outcomes. As a result, there will be no significant effect on business assets arising from the construction of the Suffolk Onshore Scheme and no mitigation will be required. The Applicant has committed to further liaison with local planning authorities including SCC and ESC and tourism organisations including the Local Destination Management Organisation ("DMO") and the Local Visitor Economy Partnership ("LVEP") during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. The Applicant has provided a detailed response regarding tourism impact monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2), and full details of commitments relevant to tourism are provided within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC).** The assessment of economic impacts set out in **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** has been assessed in line with the DLHUC Appraisal Guide. The guidance provides rationale and a methodological framework for estimating economic additionality assumptions, including assumptions relating to employment generation and GVA. The socio-economic, recreation and tourism assessment applies the guidance in a manner that reflects the local context, taking account of displacement, leakage and multiplier effects. This ensures that the reported economic impacts represent a robust and proportionate estimate of net additional effects attributable to the Proposed Project. The DLHUC Appraisal Guide has informed the economic impacts only; there is no specific statutory or nationally prescribed methodology for assessing effects on public rights of way, recreational routes or private, community, recreation and tourism assets, and these have therefore	

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				been assessed using professional judgement and established EIA practice.	
3.17.3	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]**	Assessment Methodology – 60-minute Study Area	The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each. REP1-130 identifies the labour-market constraints, skills shortages and cumulative NSIP workforce pressures in Suffolk. SCC notes that, in its latest submissions, the Applicant continues to rely on a single 60-minute study area and has confirmed that no alternative or phase-specific workforce geography is proposed, reinforcing SCC's concern that cumulative labour-market impacts are not being adequately assessed. The evidence used to support the Applicant's position on the 60-minute study area states that 90% of employees commute 60 minutes or less each way. SCC considers that more robust evidence should be used which relates to the East of England region and the construction sector as travel behaviours for work may vary based on these factors. Moreover, reliance on a 60-minute catchment does not reflect the reality that a significant proportion of the workforce, particularly skilled and specialist roles common to NSIPs, will travel in excess of 60 minutes or be drawn from national labour pools. The remaining 10% of trips that exceed 60 minutes represent precisely the cohort most likely to contribute to non-home-based accommodation demand, workforce displacement and cumulative labour-market pressure and should therefore be explicitly reflected within the assessment rather than excluded by assumption. SCC therefore considers the 60-minute study area to be insufficiently robust to represent the likely workforce geography or a reasonable worst-case scenario. This concern aligns with REP1-130 which details displacement, churn and other pressures arising from concurrent NSIPs. The Council expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a	Section 10.6 and Table 10.13 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** sets out the study areas for the assessment and the rationale for selecting this impact area. The 60-minute travel area has been used in line with appropriate research by the Chartered Institute of Personnel and Development (CIPD) which found that a significant majority (90%) of national employees commuted for 60 minutes or less each way. This approach is consistent with other DCO applications and provides a robust basis for assessing potential effects on the labour market. The proportion (30%) of the construction workforce which would be sourced from within the 60-minute drive time is considered appropriate and consistent with comparable energy infrastructure schemes and linear infrastructure schemes, reflecting the mobile nature of the construction workforce, competition for labour from other NSIPs and the niche skills required to construct these developments. While detailed information on the specific skills required at each construction or operational phase is not available, the ES has applied a worst-case assessment approach. This ensures that any potential effects on the local labour market, including displacement and churn, are appropriately considered. With an average of 65 net additional jobs required during construction and approximately six personnel on-site during operation, impacts on the supply chain, workforce displacement and churn are expected to be negligible, due to the limited scale of labour demand. See Ref 3.17.1 in terms of the Skills and Employment Plan.	Not Agreed

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			clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. SCC notes that the Applicant's latest responses confirm that such scenario-based cumulative modelling has not been undertaken and is not proposed as part of the submitted SSCEP. The identification of an appropriate and phase-specific study area is a fundamental assumption underpinning this assessment. Without it, conclusions on workforce availability, local employment capture, cumulative impacts and mitigation requirements are inherently unreliable. An inadequately defined study area also limits the effectiveness of the SSCEP, as the scale, timing and nature of skills, housing and training interventions cannot be accurately determined. SCC therefore expects the assessment methodology, including study area definition, to be agreed with the Council in advance or secured through enforceable post-consent commitments to ensure robustness and alignment with wider socio-economic modelling and mitigation planning. These expectations are consistent with REP1-130 where SCC recommends scenario-based assessment and coordinated workforce planning across NSIPs. The Council recognises that the Applicant is limited in what it can assess based on the information available regarding the specific skills required at each phase. However, the Applicant should recognise that this undermines their assessment being representative of the reasonable worst case scenario. SCC considers this point in the context of increasing cumulative workforce pressures to support its ask for an Employment, Skills and Education Strategy secured by the DCO to ensure there is provision for appropriate mitigation once there is more certainty over the project's impacts post-consent. As emphasised in REP1-130, securing such strategy is critical to managing displacement, training capacity and long-term labour market impacts in Suffolk.		
3.17.4	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]**	Assessment Methodology – Local labour workforce	The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region and evidence of increasing construction and infrastructure project workforce demand,which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods drawing from the same constrained labour pool affecting availability of workers to meet the needs of other industries and major projects within the region. SCC notes that the Applicant's latest submissions reaffirm its classification of the local labour force	As set out in Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]**, the local workforce is considered to have low sensitivity to employment changes, due to lower unemployment levels in the area compared to the East of England and national average. Therefore, the local workforce in East Suffolk is assessed to be of low sensitivity given it has the ability to absorb impacts. The Council's concerns regarding employment displacement and churn are noted. As set out in Table 10.23 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation,**	Not Agreed

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			as low sensitivity and confirm that no revised sensitivity assessment or cumulative modelling is proposed, reinforcing SCC's concern that impacts are understated. The Council notes that the Sizewell C project is entering a prolonged period of peak construction activity, with a forecast peak workforce of approximately 7,900–8,000 workers. This represents a sustained concentration of construction and engineering labour demand within Suffolk over a number of years. This demand is occurring within a regional labour market that CITB identifies as capacity-constrained. According to the CITB Construction Workforce Outlook for England 2025–2029, the East of England will require the equivalent of 4,560 additional construction workers per year to meet forecast demand, 2.0% annual growth on 2024 workforce levels, higher than the England average. CITB attributes this to higher infrastructure-led output growth combined with replacement demand from an ageing workforce, resulting in increasing competition for skilled and semi-skilled roles relevant to NSIPs, including civil engineering, plant operatives and engineering construction trades. SCC notes that this evidence directly contradicts the Applicant's assumption that the labour market has sufficient spare capacity to absorb additional cumulative demand without adverse effects. The scale, duration and specialist skills profile of Sizewell C, when combined with other nationally significant infrastructure projects with overlapping construction periods in Suffolk and the wider East of England, will therefore place sustained pressure on the regional labour market, increasing the risk of workforce displacement and churn and undermining assumptions that the local workforce has sufficient resilience to absorb additional demand without adverse economic effects. In this context, the Council considers that the assessment of low sensitivity materially understates the likely cumulative impacts on the local labour market and does not reflect a reasonable worst-case scenario. SCC notes that the Applicant's latest responses confirm that no adjustment to this sensitivity classification is proposed, despite acknowledged cumulative pressures from concurrent NSIPs. SCC disagrees with the Applicant's reasoning that lower unemployment means the workforce in East Suffolk has an increased ability to absorb impacts since impacts of workforce displacement and churn would be exacerbated by a greater likelihood of the project's workforce needing to be taken from those already in work. In SCC's view, lower unemployment increases the risk of displacement from existing employers and projects, rather than indicating	**and Tourism [REP1A-005]** in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. Given the scale of the local construction workforce in the 60-minute drive time, the level of additional employment generation by the Suffolk Onshore Scheme is relatively low and therefore workforce displacement is assessed to be limited. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** assesses the cumulative impact of the Proposed Project in addition to other Nationally Significant Infrastructure Projects. Table 13.43 of the inter-project cumulative effects assessment sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme. See Ref 3.17.1 in terms of the Skills and Employment Plan.	

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			resilience, and reinforces the need for structured mitigation to manage cumulative labour-market effects.		
3.17.5	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-004] Application Document 6.15 Scoping Opinion 2022 [APP-300]**.	Assessment Methodology – Operational employment	As set out in REP1-130, operational employment effects were initially raised on the basis that, when considered cumulatively alongside other projects in the region, small-scale operational workforces could amplify effects on the local labour market. However, SCC recognises that the levels of operational employment associated with the project are low. On this basis, SCC accepts the Planning Inspectorate's scoping opinion that operational employment effects are unlikely to give rise to meaningful impacts and considers the matter to be resolved.	The decision to scope out operational employment on the basis that it will generate negligible employment has been supported by the Planning Inspectorate as set out in **Application Document 6.15 Scoping Opinion 2022 [APP-300]**. As set out in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-004]** of the ES, the proposed converter stations would be operated by a small team based on site. In general, a minimum of two operators would be present at all times. During normal operation there would be approximately six personnel on site, divided between three shifts over a 24-hour period.	Agreed
3.17.6	**Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135]**	Assessment Methodology – Accommodation capacity and tourism	SCC is concerned that the assessment of accommodation which the Applicant has undertaken has not included, as a measure, the cost of accommodation across different types or indeed the knock-on costs in terms of private rented sector accommodation which is being drawn on. If there was an influx of demand for that sector, within that, what the consequences are on that sector, which not only serves the needs of the tourism sector but also the needs of the construction workers. The accommodation also serves some of the local populus, so there is a wider community impact. Further discussion is required with the Applicant but there needs to be some movement, as currently from the Applicant's assessment no significant impacts have been found and therefore there is nothing to mitigate, which is a stance the Council believes needs to change. Peak construction phase will have an impact on tourism accommodation, especially when cross-over with other large-scale NSIPs occurs. It is important that all parties recognise the cumulative impact of multiple large-scale construction projects and plans accordingly. Suffolk has a year-round tourism economy and is a popular location for weekend and off-season breaks. Whilst there would clearly be some business generated as a result of this work, it is important that the accommodation sector is not completely overwhelmed, to the extent that the tourism sector is adversely affected. SCC requires further information on expected accommodation capacity and understands that East Suffolk is in the process of collecting relevant data. The Applicant should update its assessment according to this data should it be submitted during the examination. The Applicant should commit to monitor effects on accommodation capacity and tourism in coordination with cumulative developments,	The Applicant has provided a detailed response to this matter within **Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135].** Please refer to 2SERT 2 and 2SERT3. With regards to monitoring impacts on tourism accommodation, refer to SE05 within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC).** The Applicant has also provided a detailed response regarding tourism impact monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2)	Not Agreed

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			particularly Sizewell C, as well as wider tourism impacts. A proportionate contribution to foster tourism, of a similar vein to the fund created by Sizewell C, may be an appropriate approach if further embedded mitigation is not feasible. SCC does not consider that the Applicant's assessment of tourism and accommodation, particularly cumulatively, is robust for the reasons given in previous submissions such as Chapter 13 of [REP1-130]. SCC also supports East Suffolk Council's submissions on this matter. SCC, therefore, considers monitoring and mitigation to be necessary and has proposed requirement wording for a Tourism Monitoring Plan to secure this.		
3.17.7	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]**	Impact on tourism and visitor perception	Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SCHAONB and Heritage Coast. The Council anticipate that the project, given its location close to the SCHAONB and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects happening simultaneously in the area, could be significant. The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers. SCC does not share the Applicant's confidence that there will not be material adverse effects on tourism. The Applicant cites monitoring reports from Sizewell B and Hinkley Point C, but these projects do not share the same contexts as Sea Link in terms of cumulative effects. Sea Link will be constructed and operated in the context of multiple other NSIPs in the vicinity being constructed and operated, including upcoming projects such as Lion Link and Helios Solar. The comparison to Sizewell B diverges in this way. Sizewell B was also of a different scale and was constructed from 1988. This shows that meaningful comparisons on effects on visitor perception today are severely limited. Sizewell C and Hinkley Point C were consented with sizeable mitigation funds for negative effects on tourism which suggests those promoters recognised the potential for significant effects. Sizewell C's mitigation measures do not account for effects from future projects such as Sea Link on the local tourism industry, meaning these effects will be unmitigated. In summary, SCC does not consider the available evidence to	Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Impacts on amenity for these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. In light of the topic-specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, landscape & visual or noise that would materially affect health and wellbeing outcomes.. Additionally, **Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]** was submitted to support the assessment of visitor and tourism impacts associated with the Proposed Project and in response to concerns raised regarding potential adverse effects on visitor numbers, spending, and perception.The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. The Applicant's review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial	Not Agreed

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			demonstrate that there will be no material negative impacts on tourism. SCC recognises the limited evidence available on the matter; however, it is the responsibility of the Applicant to gather further evidence. If this is not undertaken, SCC would consider a commitment to further assessment post-consent and a contingency fund, should evidence of negative impacts be found at a later date to ensure such impacts are adequately mitigated or offset, to be a suitable and necessary approach in this scenario. SCC does not consider that the Applicant's assessment of tourism and accommodation, particularly cumulatively, is robust for the reasons given in previous submissions such as Chapter 13 of [REP1-130]. SCC also supports East Suffolk Council's submissions on this matter. SCC, therefore, considers monitoring and mitigation to be necessary and has proposed requirement wording for a Tourism Monitoring Plan to secure this.	concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]**. In addition, the Proposed Project is significantly smaller in scale than these schemes, with correspondingly a more limited potential for effects. For example, Sea Link's peak construction workforce is 327 (for 1 day of construction) and the peak year (2028) of construction has 164 workers per annum) whilst in comparison Sizewell C's peak construction workforce is 7,900. Sea Link's peak day represents 4% and peak year represents 2% of Sizewell C's peak. In addition, the Proposed Project's construction period is expected to be 2026-2031 (a maximum of 72 months) compared with Sizewell C's construction period of 2025-2037 (144 months). The Applicant has committed to further liaison with local planning authorities including SCC and ESC, and tourism organisations including the Local Destination Management Organisation ("DMO") and the Local Visitor Economy Partnership ("LVEP") during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. The Applicant has provided a detailed response regarding tourism impact monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2), and full details of commitments relevant to tourism are provided within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC).**	
3.17.8	**Application Document 9.40 Visitor and Tourism Assessment**	Impact on visitor economy:	The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of	The Applicant has provided detailed response to this matter within **Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135].** Please refer to 2SERT3.	Not Agreed

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	Technical Note – Suffolk [REP3-065] **Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005]**	Local accommodation capacity mitigation	works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region. The Consultee raised a point around perception, in terms of visitor economy, the relationship with tourism businesses and PRoW for example (e.g. PRoW and camping business) – important to be aware of that and consider. REAC SE05 commits the Applicant to monitor and mitigate the impacts of the proposed project on tourist accommodation locally. Whilst SCC welcomes the amendments made to this commitment at Deadline 6 SCC concurs with ESC and maintains that the commitment should form part of a more detailed 'Workforce Accommodation Strategy'. SCC considers that the wording akin to that provided by ESC for a DCO Requirement in this regard is provided in response to ISH3 Action Point 1 should be implemented	Additionally, **Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]** concludes there is limited robust evidence of material adverse effects on visitor numbers, spending, or the wider tourism economy. This supports the conclusion in **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005]** that no significant adverse effects on tourism are anticipated. The Applicant has provided a detailed response regarding tourism impact monitoring within **Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]** (see 3SERT2), and within **Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter**, submitted at Deadline 7 (refer to Ref 9.2 and 9.3). Full details of commitments relevant to tourism are provided within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**.	
3.17.9	**Application Document 9.73 Applicant's Response to First Written Questions, response 1GEN1 [REP3-069]**	Community benefit	The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025. SCC recognises that the Applicant is committed to community benefits as part of its license agreement with Ofgem and considers that engagement with local authorities will be key in delivering community benefits post-consent.	As set out in **Application Document 9.73 Applicant's Response to First Written Questions, response 1GEN1 [REP3-069]**, the Applicant will follow government guidance which sets expectations for how community benefit funds should be delivered for transmission infrastructure projects. Separate to, and outside of the planning process, the Applicant will undertake engagement with local communities and stakeholders in 2026 to understand what is important to them. This engagement will inform the development of the community benefit programme for the Proposed Project. Suffolk County Council will be invited to partake in this engagement and provide their suggestions on potential uses for this funding. The Applicant would like to clarify that, as per Government guidance, "Community funds are not a means of mitigating environmental or social impacts of infrastructure project, which the project developer should address through the planning process." Separate to this guidance, the Government has also announced plans for a bill discount scheme for nearby households. The Applicant will continue to work with Government as further details of this scheme emerge.	Agreed
3.17.10	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics,**	Assessment conclusions	This leakage rate is unacceptable, particularly with the number of infrastructure projects in the local area, including those by the Applicant. SCC notes that the Applicant's latest submissions reaffirm reliance on assumed leakage rates derived from national benchmarks and confirm that no	See previous responses in Table 3.17.	Not Agreed

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	Recreation and Tourism [REP1A-005]		cumulative adjustment is proposed to reflect the high concentration of NSIPs in Suffolk. The Council would expect that the Applicant works as a meta-project in order to reduce the leakage rate and maximise the number of jobs taken up by residents through investment in skills, training and workforce development locally. The construction labour force displacement has been assumed to be low without taking into account competition from other major infrastructure projects in the region and existing skill shortages, as well as lower economic activity rates, despite the Applicant's acknowledgement of multiple overlapping NSIPs and specialist workforce demand. This has the potential to risk project timelines and inflated project costs, as well as a negative economic legacy in the region. In particular, the Council identifies the following key issues with the Applicant's approach to workforce assessment and conclusions: • the failure to adequately account for cumulative labour-market demand arising from multiple concurrently programmed major infrastructure projects in the region • an over-reliance on assumptions drawn from other schemes without sufficient regard to the unique skills and employment context of East Suffolk, including the influence of Sizewell C and other NSIPs • insufficient consideration of existing skills shortages in construction, engineering, logistics and related sectors • inadequate recognition of lower local economic activity rates and barriers to workforce participation, which limit the availability of labour without targeted intervention • assumptions of low workforce displacement and churn that are not supported by regional evidence • limited assessment of the potential knock-on effects on other industries, local businesses, and the visitor and hospitality economy • the absence of a coordinated strategy to mitigate these risks through structured skills investment and collaborative workforce planning continued reliance on generic leakage and displacement assumptions notwithstanding evidence of cumulative NSIP pressure in Suffolk • explicit confirmation by the Applicant that the SSCEP is not intended to operate as mitigation for these risks The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of		

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			residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods affecting availability of workers to meet the needs of other industries and major projects within the region. SCC notes that the Applicant's latest submissions confirm that this low-sensitivity classification remains unchanged and that no revised cumulative sensitivity assessment is proposed. Conclusions drawn regarding the construction workforce labour supply fail to consider the cumulative impact of multiple major infrastructure projects and existing skill shortages and therefore do not represent a reasonable worst-case assessment of labour-market effects in the Suffolk context. The Council has given its detailed position on the Applicant's assessment conclusions in chapter 13123 [REP1-130] of its LIR, including regarding the potential for greater adverse impacts on the visitor economy, hospitality and local businesses.		
3.17.11	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**	Cumulative Effects - Available workforce	Given the number of Nationally Significant Infrastructure Projects ("NSIPs") and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important. SCC notes that the Applicant's latest submissions maintain that cumulative construction-phase labour-market effects will be limited and do not require mitigation, reinforcing the need for this matter to be clearly addressed. The construction period for this project is predicted to coincide with those of Sizewell C Nuclear Power Station, NSIPs promoted by SPR, and (if consented) National Grid Ventures' ("NGV's") LionLink project. It is anticipated that this would create significant cumulative pressure on the available workforce in the area and would impact tourism, both in terms of visitor perception and visitor numbers, on the Suffolk Coast. The Council considers it essential that the Applicant engages with local businesses and the host communities to discuss potential impacts and appropriate mitigation and management measures, as well as and community benefits. Whilst the Council recognises the Applicant's estimation for average net additional jobs per annum, the context of cumulative schemes means this will put additional pressure on existing and forecast skills shortages. SCC notes that the Applicant's latest submissions continue to rely on annual	A full assessment of cumulative effects with other developments proposed in the area, including Sizewell C and LionLink, has been undertaken following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** No residual significant cumulative effects were identified from a socio-economics perspective. Additionally, through commitment SE04 the Applicant has committed to further liaison with local planning authorities and tourism organisations during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. See Ref 3.17.1 in terms of the Skills and Employment Plan.	Not Agreed

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			average employment figures and do not address the implications of peak workforce demand or overlapping construction phases. In this context, the Council identifies a number of key issues relating to cumulative workforce availability, including but not limited to: • the combined scale, duration and phasing of overlapping NSIPs drawing from the same constrained labour market • intensified competition for skilled and semi-skilled roles, particularly in construction, civils, engineering, logistics and supervisory occupations • increased risk of workforce displacement and churn affecting local businesses and other major projects • pressure on local training providers and skills pipelines that are already servicing multiple NSIPs concurrently • knock-on effects on the visitor economy and hospitality sector arising from workforce accommodation demand and changes in visitor perception • the Applicant's continued reliance on informal or ad-hoc coordination with other NSIPs rather than a structured approach to managing cumulative workforce impacts The Council also has concerns regarding the adequacy of the Applicant's cumulative effects assessment, which does not sufficiently reflect these risks. In particular, the assessment relies on assumptions of low labour-market sensitivity, limited displacement and modest cumulative demand, without robust scenario-based modelling that accounts for the overlapping construction programmes, known regional skills shortages, and evidence of constrained workforce capacity. SCC notes that the Applicant's latest responses confirm that no revised sensitivity assessment or cumulative scenario-based modelling is proposed. As a result, the Council considers that cumulative impacts on workforce availability are likely to be greater than assessed. These assessment limitations directly inform SCC's position on the need for a robust SSCEP. The SSCEP is required not only to capture updated and more realistic cumulative workforce information, but also to secure appropriate mitigation measures, including coordinated workforce planning, targeted skills and training investment, governance through the RSCF. The Council considers that the likelihood of greater cumulative impacts on the available workforce justifies the additional commitments and safeguards sought		

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			through the SSCEP in order to manage risk, protect the local economy and support sustainable project delivery. SCC has commented further on the cumulative effects assessment in relation to socioeconomic issues in various submissions, including Chapter 13 of SCC's LIR [REP1-130] such as paragraph 13.48, 13.49 and 13.56.		
3.17.12	N/A	Cumulative Effects - Assessment of local labour force	The Council disagrees with the Applicant's assessment that the local labour force is of low sensitivity, as there are existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods drawing from the same constrained labour pool, thereby affecting the availability of skilled and semi-skilled workers to meet the needs of other industries and major projects within the region. This could also potentially reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects are likely to be occurring in parallel. SCC notes that the Applicant's latest submissions reaffirm the low-sensitivity classification and confirm that no revised sensitivity assessment is proposed, reinforcing SCC's concern that cumulative impacts are understated. The Council considers that the Applicant's sensitivity assessment understates the scale and nature of cumulative impacts by relying on overly generalised assumptions about labour availability and adaptability. In particular, the assessment does not sufficiently account for the combined effect of simultaneous NSIPs, nor the limited capacity of the local labour market in response to highly specialised construction and engineering demand. As a result, the assessment risks underestimating displacement, churn and the diversion of labour away from local businesses and other sectors. SCC considers that sensitivity should be rated medium-high, given the existing skills shortages identified in the recent regional and national workforce reports, including CITB Workforce Outlook 2025-2029 and SCC's own Energy and Climate Adaptive Infrastructure Policy. SCC further considers that the Applicant's current sensitivity rating fails to reflect evidence that the East of England requires sustained annual workforce growth to meet forecast infrastructure demand, at levels above the national average. When combined with long construction durations and overlapping peak phases, this increases the risk to the local labour force of adverse cumulative effects and undermines	The Applicant's socio-economic, recreation and tourism assessment concludes that the Suffolk Onshore Scheme would not result in significant inter-project cumulative effects. The Applicant maintains that the classification of the local labour force as having low sensitivity to employment change is appropriate within the context of the assessment methodology set out in Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]**. This reflects lower levels of unemployment in the area compared to the East of England and national average, as well as the inherently mobile nature of the construction workforce. Additionally, within the 60 minute drive time there is a higher proportion of residents in skilled trade occupations compared to the regional and national averages. These characteristics suggest that the area has capacity to absorb the employment impacts of the Proposed Project without significant disruption or strain on the local economy. Therefore, classifying labour supply sensitivity as low is considered appropriate. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** assesses the cumulative impact of the Proposed Project in addition to other NSIPs. Table 13.43 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme. See Ref 3.17.1 in terms of the Skills and Employment Plan.	Not Agreed

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			assumptions that impacts can be absorbed without wider economic consequences. SCC expects the Applicant to use SCC's own criteria for assessing sensitivity of the local labour force, which includes availability by skill type, spare capacity in the local market, phase duration, training lead times and cumulative drawdowns across all local NSIPs. SCC notes that the Applicant's latest submissions confirm that these criteria have not been applied and that no revised assessment approach is proposed. The assessment methodology has implications for the robustness of the overall cumulative effects assessment and for the effectiveness of proposed mitigation. In SCC's view, the incorrect classification of labour-force sensitivity contributes to an underestimation of impacts and reinforces the need for a strengthened SSCEP. The SSCEP is therefore required as adaptive mitigation, capable of responding to emerging labour-market pressures, supporting timely skills pipeline development and preserving opportunities for local employment and long-term legacy outcomes in circumstances where cumulative impacts are greater than originally assessed. SCC notes that the Applicant has confirmed that the submitted SSCEP is not intended to operate as mitigation, which reinforces the need for a strengthened, DCO-secured approach.		
3.17.13	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**	Cumulative Effects - Workforce displacement	This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement. What changes need to be made to this section to update it in light of the latest Applicant responses. Highlight where text is to be deleted/amended/added: SCC strongly disagrees with the Applicant's conclusion that cumulative labour supply will be sufficient within a 60-minute travel area. This assumption fails to address the cumulative impacts of multiple NSIPs on specialist skills, caused by overlapping construction timelines and competition for similar roles such as high voltage plant specialists, cable jointers, commissioning engineers, ecologists and heritage specialists. SCC notes that the Applicant's latest submissions reaffirm reliance on the 60-minute catchment and confirm that no alternative or phase-specific workforce geography is proposed. The cumulative demand will far exceed local availability, creating risks of displacement, wage inflation and	A full assessment of cumulative effects with other developments proposed in the area, including Sizewell C and LionLink, has been undertaken following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** No residual significant cumulative effects were identified from a socio-economics perspective. **Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** assesses the potential effects of the Proposed Project on construction workforce generation. The calculation of construction workforce generation accounts for additionality impacts, including a 50% displacement factor, in line with MHCLG Additionality Guidance and HCA Additionality Guide. This assessment measures the extent to which the benefits of the Proposed Project are offset by reductions in output or employment elsewhere. Applying the 50% displacement	Not Agreed

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			labour churn that could negatively impact local businesses and service delivery. Workforce displacement and churn at the scale anticipated have the potential to adversely affect the viability of local businesses, disrupt the delivery of other infrastructure projects and reduce the ability of Suffolk to secure lasting socio-economic benefits. The reliance on a single 60-minute travel-time assumption fails to demonstrate the reality, meaning local labour availability and resilience are inherently overstated. These risks reinforce the need for the Applicant to work collaboratively with SCC to develop structured and enforceable mitigation and justify the requirement for a robust SSCEP secured through the Development Consent Order to operate as mitigation rather than reliance on assumed labour availability or voluntary measures.	factor acknowledges that additional demand for labour cannot simply be treated as a net benefit and therefore is reduced to the extent that this occurs. See Ref 3.17.1 in terms of the Skills and Employment Plan.	

Table 3.18 Health and Wellbeing

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.18.1	**Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]**	Electric and Magnetic Forces	The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to. ~~Nevertheless, the Council expects the completion of an EMF risk assessment as required by Management of Health and Safety at Work Regulations 1999 and HSEs Control of Electromagnetic Fields at Work Regulations 2016.~~ SCC defer to UK Health Security Agency (UKHSA) for technical compliance in relation to EMF.	Health considerations are given a high priority in the process by which the Applicant arrives at any proposals for new electricity circuits. Assessment of compliance with Electrical and Magnetic Forces (EMF) guidelines and policies is key to the Applicant's approach. The UK has a carefully thought-out set of policies for managing EMFs. There have been over four decades of research looking into whether EMF can cause health effects and there are no established effects below the exposure limits. When designing overhead lines, substations and cables, design criteria ensure they will not exceed those exposure limits, even when operating at 100% capacity. Additionally, the precautionary measures which the Government have adopted, are applied to the design which ensure the EMFs reduce as quickly with distance as possible. Evidence of that is presented in **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]** submitted as part of the DCO application.	Agreed
3.18.2	**Application Document 5.1 Consultation Report [APP-301]**	Community engagement	Suffolk County Council has published a supplementary guidance document for NSIP developers on the topic of Community Engagement and Wellbeing, to support its Energy and Climate Adaptive Infrastructure Policy.	The Applicant acknowledges the Council's concerns. There has been an extensive programme of engagement which is in accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods. There have been multi-stage pre-application consultations allowing	Not Agreed

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			This guidance highlights the importance of effective engagement in safeguarding community wellbeing, particularly mental health, throughout the lifecycle of major infrastructure projects. The Council considers it essential for promoters to seek to develop relationships of trust, confidence and understanding with the community, taking a collaborative approach to involving the community in the design and delivery of the project. Clear, comprehensive, honest, and open engagement with the community throughout the pre-application, consenting, construction and decommissioning phases helps to safeguard community wellbeing, as participants are more likely to feel that they are being listened to and their opinions and ideas are being taken into account. The Council recognises that the Applicant has undertaken consultations referenced in its position. However, the Council considers that effective engagement with the local community during certain parts of the pre-application stage has not been achieved. The targeted consultation overlapped the start of the summer holidays and the Ofgem consultation for Nautilus and only lasted 5 weeks. The timing of these consultations will therefore have limited the community's ability to effectively engage with and respond to the consultations. Given the advanced stage of the examination, SCC considers that mitigation should take the form of monitoring of mental health and wellbeing, such that community feedback helps inform the identification of emerging issues and the deployment of proportionate and adaptive mitigation measures over time.	consultees several opportunities to provide feedback as the proposals evolved. Pre-application consultation involved four phases. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by two phases of statutory consultation, undertaken in accordance with the Statement of Community Consultation—the preparation of which included contributions from the Host Authorities. Statutory consultation was held between 24 October 2023 and 18 December 2023. Targeted consultation took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement), was held between 22 November 2024 and 12 January 2025. All feedback received during the four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement undertaken by the Applicant as part of its preparation of the application for development consent for the Proposed Project. Changes have been introduced into the Proposed Project design as a result. The consultation process and its outputs are captured in **Application Document 5.1 Consultation Report [APP-301]** and the Planning Inspectorate has accepted the DCO application on the basis of the approach to consultation. The Applicant met with SCC on 7 April 2026 to further discuss health and well-being. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**,submitted at Deadline 7, which address the management of potential impacts on health and wellbeing.	
3.18.3	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**	Assessment methodology – mental health and wellbeing	The Council expects mental health, and wellbeing impacts to be assessed as part of the ES. The Council is concerned that the assessment of effects on mental health and wellbeing lacks detail and may not capture the full extent and magnitude of these effects especially when considering the combined effects of cumulative schemes. 11.9 of [APP-058] recognises the potential increased demand on GP Practices, but it does not appear to consider the potential impact on mental health (MH) and mental health services in enough detail. There is a lack of detail on how impacts on these services have been assessed, such as in terms of impacts on capacity, which means the Council is not confident that the assessment is sufficiently extensive. It is vital for these impacts to be	The assessment of health and wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a "*state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity*". The IEMA guidance outlines that both physical and mental health should be considered "*across the analysis of bio-physical, social, behavioural, economic and institutional influences on population*	Not Agreed

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	Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC), submitted at Deadline 7 **Application Document 7.10 Coordination Document [APP-363]** **Application Document 5.1 Consultation Report [APP-301]**		properly assessed, as major infrastructure projects can generate anxiety and distress among local residents, meaning the accessibility of these service must be safeguarded. It is recommended that the assessment considers whether the construction and operation phases could place additional pressure on local MH services, and whether any mitigation or support measures should be identified. In particular, SCC do not consider that mental health has been meaningfully assessed as a distinct or substantive outcome. The assessment makes only a limited and largely implicit reference to mental health within the context of social cohesion and community identity at paragraph 11.9.53. This level of assessment is insufficient for such an important domain, especially given the scale, duration and cumulative context of the Project. Specifically, [APP-058] does not evaluate key mental health pathways that are reasonably foreseeable in the context of the Project. These include the mental health effects of prolonged uncertainty over a multiyear construction period, sustained exposure to multiple, overlapping disturbances, loss of predictable respite and recovery opportunities, and the cumulative psychological burden experienced by communities hosting successive NSIPs. cts; these impacts may not translate into immediate service demand but nonetheless affect population wellbeing. The same critic sm is true in the assessment of vulnerable groups. The Applicant's consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060 and [APP-058]. These deficiencies are not resolved by the mitigations currently proposed, nor addressed further at DL5. The guidance referred to by the Applicant recommends a 1:1800 GP:Patient ratio. However, this guidance was published in 2009 and so was created with limited foresight of the various regional socioeconomic and demographic contexts at present. This is particularly relevant for the demographic context for the Suffolk Onshore Scheme which is above average in terms of average age. When considering the presence of other vulnerable groups as well, there is potential for patients to, on average, require	*health outcomes"*, and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). This has particular relevance for the following determinants within the health and wellbeing assessment: • **Access to healthcare services and other social infrastructure** - assessment considers socio-economic conclusions on influx of workers and demand on services, and transport conclusions on severance. • **Access to open space, leisure and play** - assessment considers socio- economic and transport conclusions to inform access and land use impacts. • **Transport modes, access, connections and physical activity -** assessment considers socio- economic and transport conclusions to inform access impacts from severance and PRoW impacts. • **Social cohesion and community identity -** assessment considers socio- economic, transport, and L&V to inform amenity impacts. • **Noise and Vibration –** assessment considers noise conclusions to inform assessment. It is the Applicant's view that **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** concludes that there are no anticipated significant effects as a result of the Proposed Project. The cumulative effects associated with health and wellbeing are also assessed in **Application Document Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective cumulative effects assessments of these relevant environmental disciplines. Therefore, the health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual	

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			health services to a greater extent than elsewhere. However, this is not captured by the ratio used by the Applicant as the metric by which it appears to derive its assessment conclusions. A key consideration across all phases is the potential for cumulative effects, both intra and inter. The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are "*minor adverse (not significant*)" and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment acknowledges that, for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there is potential for significant cumulative effects during construction, operation, and decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific health and wellbeing mitigation is confirmed for these cumulative effects. Similarly, the inter-project cumulative effects assessment [APP-060] identifies potential impacts on health and wellbeing arising from landscape and visual effects, noise and vibration, traffic and transport, and social cohesion. Despite recognising that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity, the Applicant concludes that because individual effects from each project are generally assessed as "*minor adverse (not significant)"* and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is "*not significant*", with no health and wellbeing mitigations proposed. SCC considers in respect of cumulative impacts, the approach taken within [APP-058], [APP-059] and [APP-060] does not adequately reflect the lived experience of affected communities, nor the combined psychological and social consequences of prolonged disturbance, uncertainty and repeated exposure to development activity. The assessments consider individual environmental effects in isolation, rather than capturing how multiple "minor adverse (not significant)" effects may interact spatially and temporally to produce materially harmful outcomes for mental health and wellbeing. This risks systematically underestimating the severity and persistence of cumulative health impacts, particularly in communities experiencing multiple NSIPs in succession or in close proximity.	amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. The Applicant met with SCC on 7 April 2026 to further discuss health and well-being. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7, which address the management of potential impacts on health and wellbeing. The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363]**. As set out in **Application Document 5.1 Consultation Report [APP-301]**, the Applicant considers that no further changes are considered necessary to be made to the submitted DCO application to make the Proposed Project consistent with national policy in regard to health and wellbeing impacts. In response to the Council's expectation that mental health and wellbeing impacts be fully assessed as part of the ES, the Applicant notes that these have been considered in accordance with best practice guidance, and the importance of mental health has been fully acknowledged and embedded throughout the assessment process. Additionally, the Health and Wellbeing assessment in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 [APP-058]** explicitly considers mental health as part of a holistic approach to health, in line with WHO and IEMA guidance. Potential impacts on mental health services are captured within the assessment under the determinant "*Access to healthcare services and other social infrastructure*", which accounts for both primary care and mental health provision. The assessment recognises that construction and operation of the Proposed Project could generate anxiety or distress among local residents. Potential additional demand on healthcare services is considered, and even in a worst-case scenario, the GP:Patient ratio is predicted to remain broadly in line with recommended guidance in Section 11.7. This ratio originates from recognised guidance and it is applied as a conservative benchmark indicator, rather than a standalone measure of healthcare capacity or need. As such, the assessment in section 11.9 of "*Access to healthcare services and other social infrastructure"* draws on up-to-date public health, socio-economic, and environmental data,	

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				explicitly accounting for the older age profile of the local population and the presence of vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. Overall, any effects on health and wellbeing arising from increased demand on healthcare services or temporary reduced access to social infrastructure during construction are assessed as temporary and negligible (not significant). The Applicant has provided further information regarding the significance of potential intra-project cumulative effects in **Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note** [**REP6-117**]. It is notable that three of the four councils asked to identify additional mitigation or offsetting effects for intra-project cumulative effects have concluded that no such measures are available. The Applicant has explained its position regarding those measures proposed by SCC in response to point 16 in **Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter**, submitted at Deadline 7. The findings of the intra-project cumulative effects assessment considered amenity impacts for residents, transport users and PRoW users and should not be confused with the assessment of health and wellbeing.	
3.18.4	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 7.9 Equality Impact Assessment [APP-362]**	Assessment methodology - Data used in Health and Wellbeing Assessment	Paragraph 11.7.21 [APP-058] refers to Mental Health within Local Health Profiles, but does not set out a profile. – The Council acknowledges the Applicant's position but does not agree that it can replace a profile which is founded on evidence and data. A data driven profile would also allow SCC to evaluate whether the profile is an accurate reflection of mental health in the area and how robustly evidenced it is. SCC Public Health therefore maintain that this absent data is a key omission to the Applicants assessment, limiting the accuracy of baseline of mental health such that the adverse impacts may be underestimated. Such a profile could reasonably have drawn on routinely available data sources, including Public Health Outcomes Framework / Fingertips, Adult Psychiatric Morbidity Survey (APMS), Local Insight / Joint Strategic Needs Assessment (JSNA), NHS Talking Therapies (IAPT) dashboard data (e.g. access, recovery rates, waiting times), Secondary care mental health access / activity data, Mental Health Services Dataset (MHSDS). These data sets would have provided critical contextual information on underlying vulnerability, resilience and service pressure, enabling more meaningful interpretation of how project related stressors may interact with existing and predicted mental health needs and capacity. The Council therefore cannot presently agree that the Applicant's assessment has been undertaken against a robust benchmark.	In terms of providing a full assessment and profile of mental health, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** draws upon a range of socio-economic and public health data, including wider determinants of health that influence mental wellbeing, such as self-reported health, prevalence of long-term health conditions, the Index of Multiple Deprivation (MHCLG, 2019), Community Life Survey (Department for Culture, Media and Sport, 2023), and access to local services (incl. greenspace, PRoW). The chapter also incorporates baseline indicators relevant to health and wellbeing from other environmental topic chapters, including employment, air quality, transport, noise and vibration, and climate change. While specific quantitative indicators of stress, resilience, or anxiety are not separately reported, the assessment explicitly considers determinants and pathways that underpin these outcomes. In doing so, it inherently recognises the factors affecting quality of life, broader wellbeing, and mental health within the Study Area. The assessment within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been undertaken against a robust benchmark of baseline health conditions, with full cognisance of relevant mental health and wellbeing issues, and in line with established IEMA guidance (IEMA, 2022) and IEMA Guide to Determining Significance For Human Health In Environmental	Not Agreed

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			Paragraph 11.7.42 does not set out a broad demographic assessment, omitting unemployment rates, protected characteristics, gypsy/ travellers non-English speakers, people involved in the criminal justice system, refugees and/or asylum seekers, single parent families and people with low literacy/numeracy. These characteristics are well recognised determinants of mental health outcomes and are associated with increased susceptibility to stress, reduced access to services, and lower capacity to adapt to prolonged environmental disturbance or uncertainty. The assessment fails to note if these groups are more likely to be adversely affected by the proposal, which should be reflected in their sensitivity classifications, and key learnings should be used to inform mitigations. Public Health recognises that [APP-362] makes reference to protected characteristics, however, within the Health and Wellbeing chapter itself, vulnerable groups are not clearly defined, nor is it explicit how specific demographic groups, including those sharing protected characteristics, have informed the health baseline, sensitivity classifications or assessment of mental health and wellbeing effects. This lack of transparency makes it difficult to understand how differential vulnerability has been accounted for and whether the assessment adequately reflects the likely distribution and severity of mental health impacts across the population. Public Health considers that groups identified elsewhere in the application documentation as being potentially more susceptible to adverse effects should have been more transparently and systematically reflected within Chapter 11. SCC also notes that the EqIA identifies a range of potential adverse impacts for protected groups, including those arising from construction noise, vibration, traffic, air quality and temporary disruption to Public Rights of Way, and acknowledges that such impacts may be experienced differentially. Public Health does not consider that the conclusions of the EqIA can be relied upon in isolation to demonstrate that equality impacts on mental health and wellbeing are minimal, as indicated in Paragraph 10.1.10. The EqIA is largely qualitative, high-level and detached from the detailed assessment of health and wellbeing effects [APP-058], and it is not clear how identified susceptibilities relating to age, disability and other protected characteristics have materially informed the health baseline, sensitivity classifications or assessment of mental health and wellbeing outcomes. The absence of a clearly evidenced, data-driven mental health baseline within [APP-058], alongside limited transparency regarding how vulnerable groups have been factored into the	Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022). **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** considers the potential for effects on both the general population and vulnerable groups. Baseline information on employment, income, and socio-economic characteristics in Paragraph 11.7.42 is drawn from **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005],** which does include data from the Annual Employment Survey (Office for National Statistics, 2022) on unemployment, claimant rate, and qualifications, and also considers data from the Indices of Multiple Deprivation (IMD) (Ministry of Housing, Community and Local Government, 2020). **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions in its assessment of health and wellbeing effects, in terms of sensitivity classification. This ensures that differential health outcomes and potential disproportionate effects on more sensitive populations are appropriately captured within the assessment. The approach taken represents a proportionate and robust application of current guidance, ensuring that both stakeholder insight and recognised health determinants are appropriately considered in the assessment of potential effects. **Application Document 7.9 Equality Impact Assessment [APP-362] (EqIA)** sets out how the Proposed Project has had due regard to the Public Sector Equality Duty. It establishes a demographic and socio-economic baseline for the Suffolk study area (and Kent), including consideration of protected characteristics under Section 4 of the Equality Act 2010: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. In June 2024, thematic meetings were held with Suffolk County Council and East Suffolk Council to present the EqIA's purpose, methodology and potential impacts. **Application Document 5.1 Consultation Report [APP-301]** presents an analysis of the inclusion and diversity data collected from the feedback forms used during the consultation. No equalities specific issues deemed of great enough significance to influence the outcomes of the assessment of impacts were identified in the comments received. Due regard has been demonstrated through assessment of potential direct and indirect equality impacts, adverse and beneficial, across construction, operation and decommissioning. The assessment draws on policy and legislative review, the project description, the equalities baseline and consultation findings. Potential positive impacts relate to temporary employment during construction and decommissioning of the Suffolk and Kent	

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			assessment of mental health pathways, reduces confidence in the robustness of the conclusions that residual equality impacts are minimal. As such, SCC considers that the EqIA does not, of itself, resolve concerns regarding the potential for disproportionate mental health and wellbeing impacts on protected and vulnerable groups, particularly in the context of cumulative and prolonged exposure. This reinforces Public Health's position that a proportionate, post consent Mental Health and Wellbeing Monitoring Plan is necessary to ensure that equality related mental health impacts are identified, understood and addressed in practice over the lifetime of the Project.	Onshore Schemes, although targeted measures would be required to maximise benefits for protected groups. Potential adverse impacts include temporary PRoW closures and diversions, increased noise, vibration and traffic, and changes in air quality. With mitigation in place, residual equality impacts are considered minimal, localised within the Order Limits, and unlikely to be substantial or frequent.	
3.18.5	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]**	Assessment Methodology – Study Area	The Council requested clarity on the potential for adverse impacts beyond the assessed study area. SCC acknowledge the Applicant's explanation regarding the definition of the study area for the Health and Wellbeing assessment and accepts that, for the purpose of identifying and assessing likely significant effects at the EIA stage, the approach taken appears reasonable. Notwithstanding, Public Health considers that reliance on a defined study area does not in itself provide sufficient assurance that health and wellbeing impacts, particularly cumulative and mental health effects, will be not extend beyond study area limits. For example, mental health and wellbeing effects may arise and evolve over time, and may affect communities and vulnerable groups beyond the initially assessed study area, particularly in the context of multiple NSIPs and prolonged construction activity. This premise further reinforces the need for monitoring as detailed earlier in the SoCG, providing a mechanism to identify emerging or unanticipated impacts, including those outside the study area.	The study area has been set out within the ES chapter (**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]**). The Study Area for health and wellbeing effects is based on the extent and characteristics of the Proposed Project and the communities/wards directly and indirectly affected. Impacts that occur beyond this are also addressed within the assessment itself, as the Human Health assessment draws upon the findings of supporting chapters to inform its conclusions. These chapters have their own Study Areas for their own individual assessments, which vary in their extent. Each chapter also sets out mitigation measures relevant to their individual disciplines, such as environmental management plans. Each of these chapters also includes a baseline section, which sets out relevant information about the study area. Considering this methodology, the choice of Study Area for the Human Health assessment is appropriate and in-line with best practice IEMA guidance (IEMA, 2022). This is consistent with the study areas adopted for comparable NSIPs. Additionally, the geographical impact areas were detailed within the scoping report to which the Planning Inspectorate raised no comments in relation to the study areas. On this basis, the Applicant considers that no revisions to the study areas presented in the ES are required. The Applicant met with SCC on 7 April 2026 to further discuss health and well-being. The Applicant does not agree with committing to a mental health and wellbeing monitoring plan. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7, which address the management of potential impacts on health and wellbeing.	Not Agreed

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3.18.6	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** **Application Document 9.83 (B) Code of Construction Practice [REP4-232]** and **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7	Mitigation of health and wellbeing effects	SCC notes the addition of commitment HW02 to the REAC at Deadline 6. SCC proposed changes to this commitment at Deadline 7 in comments on Deadline 6 submissions. Within [APP-058], the Applicant has relied primarily on embedded design measures and generic control and management measures, with no additional mitigation proposed specifically to address health and wellbeing impacts. Paragraph 11.8.1 states that "The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts…" and paragraph 11.10.1 concludes that "After considering embedded and control and management measures no likely significant adverse effects have been identified. Additional mitigation measures are therefore not required to further reduce, mitigate or offset likely significant adverse environmental effects on health and wellbeing receptors". This position is then carried through into the residual effects conclusions, with paragraph 11.11.2 stating that "there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme". Public Health has consistently challenged these conclusions. The assessment underestimates the nature, extent and persistence of health and wellbeing effects, particularly those arising from cumulative exposure to disturbance, including landscape and visual change, traffic and transport, diversions to Public Rights of Way, noise and vibration, restrictions in access to healthcare, diminished sense of place, belonging and control, uncertainty, and the concentration of multiple NSIPs in Suffolk. These limitations are compounded by the proposed construction programme that sets out lengthy core working hours. Sustained activity outside conventional weekday periods has the potential to materially reduce predictable opportunities for respite over a prolonged construction period. Even where technical thresholds for individual effects are not exceeded, continuous exposure to noise, vibration, visual change and access disruption can feasibly contribute to stress, sleep disturbance, anxiety and reduced quality of life, particularly when combined with wider uncertainty and loss of control. These effects are likely to be disproportionate for vulnerable groups, including older residents, disabled people and those without access	**Health and Wellbeing Monitoring** The Applicant met with SCC on 7 April 2026 to further discuss health and wellbeing. The Applicant does not agree with committing to a mental health and wellbeing monitoring plan. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7, which address the management of potential impacts on health and wellbeing. **Vulnerable Populations** Additionally, the Applicant refer to its response regarding vulnerable populations, and the relevant embedded measures and REAC commitments to reduce impacts on health and wellbeing for these communities. This is set out within **Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter**, submitted at Deadline 7 (refer to Ref 10.3). Specifically, those most applicable to reducing potential impacts on vulnerable populations include: • **HW01:** Sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on health and wellbeing receptors. • **HW02**: o Provision of a Community Liaison Officer (CLO) trained in mental health awareness o Meet the Project events in Saxmundham and Aldeburgh – one-to-one surgeries where people can meet National Grid's community liaison officer in a neutral space to ask questions and make suggestions without having to travel to the main construction compound (which may be intimidating and not practicable for safety reasons). o Providing a community contact phone line and email address where people can go with any queries which we will aim to respond to personally rather than generically. Ensuring that these contact details are widely displayed and included on all community updates. o Ensuring contractors follow mental health-aware community behaviour standards	Not Agreed

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			to private transport, who may have fewer opportunities to avoid exposure or access alternative environments for respite. Whilst Public Health recognise the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working represents the least harmful option as part of the mitigation hierarchy. In the absence of such consideration, the potential for cumulative mental health and wellbeing effects arising from extended and overlapping construction activity remains insufficiently mitigated. Public Health therefore considers that additional mitigation is required to address cumulative impacts on community mental health and wellbeing arising from the prolonged and combined interaction of construction activities. This should include restrictions to core construction hours as proposed by the Council in its rewording of Requirement 7. Public Health therefore considers that additional mitigation is required to address cumulative impacts on community mental health and wellbeing arising from the prolonged and combined interaction of construction activities. This should include restrictions to core construction hours as proposed by the Council in its rewording of Requirement 7. Any exceptions should be agreed in advance with the LPA, with startup and closedown periods limited to no more than one hour either side of core hours and excluding activities likely to cause disturbance to nearby residents or businesses. A further limitation is the absence of targeted mitigation for vulnerable groups. Whilst [APP-058] refers in general terms to considering vulnerable groups, Public Health raised in ISH3 post hearing submission that specific groups, including neurodiverse individuals, people with sensory sensitivities, older residents and those without access to private transport, are not meaningfully addressed either in the assessment or in mitigation design. Taking these matters together, Public Health maintain the view that monitoring of mental health and wellbeing is fundamental to mitigating impacts, as it enables the identification of emerging issues in real time and provides an evidence base to inform proportionate and responsive mitigation. Given the uncertainty associated with predicting mental health and wellbeing effects, especially those that may arise cumulatively and over extended timeframes, reliance solely on predefined embedded and management meesures is not considered sufficient. Instead, a framework	○ Attend and contribute to the Sizewell Health and Wellbeing Working Group meetings, if the existing attendees are in agreement. • **NV01:** Construction working will be undertaken within the agreed working hours set out within the DCO. Best practicable means (e.g. screening) to reduce construction noise will be set out within the CEMP and Construction Noise and Vibration Management Plan (NVMP), which will be substantially in accordance with the Outline Construction Noise and Vibration Management Plan (OCNVMP). • **NV03 -** The contractor will conduct detailed construction noise and vibration assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors, and therefore whether additional measures, including site-specific Best Practicable Means (BPM), may be required. • **NV07:** Saxmundham Converter Station and Friston Substation will include appropriate noise mitigation measures in the design. • **GG37:** National Grid have aligned working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation at Friston Kiln Lane and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order with the working hours secured in the SPR East Anglia One (North) and East Anglia Two DCOs. The combination of embedded mitigation and additional community-focused measures ensures that any potential for disruption is minimised and that appropriate channels are in place to respond to any concerns that may arise. The Applicant maintains the Health and Wellbeing assessment in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** has been undertaken in accordance with IEMA (2022) guidance. As such: • Vulnerable groups, including elderly, disabled and neurodivergent populations, are explicitly captured through baseline data and receptor sensitivity; • Potential impact pathways (e.g. changes in traffic, noise, air quality and access) have been assessed across all topics; and; • The findings consistently demonstrate no significant residual adverse effects on health and wellbeing. Individual sensitive receptors (such as schools and care facilities) have been identified and assessed where relevant through topic-specific assessments. The Applicant therefore considers that:	

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			for robust adaptive mitigation is required, capable of responding dynamically to issues identified through ongoing monitoring and engagement. A Mental Health and Wellbeing Monitoring Plan is therefore recommended for the duration of the Project (construction and early operation), with clear reporting routes and defined review points. The Applicant should also actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both 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. Furthermore, the Applicant should establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that emerging health and wellbeing impacts are addressed effectively and transparently. Another factor reinforcing the need for a comprehensive monitoring plan is the potential for adverse cumulative effects on vulnerable groups, as well as the likelihood of unforeseen changes within the planning and community context over the lifetime of the Project. For example, SCC is aware that a new SEND school is due to open in close proximity to the B1121 and the Applicant's permanent access road. This receptor does not appear to have been considered within the Applicant's assessments, potentially reflecting the timing of the application relative to the evolving local baseline. This illustrates a key limitation of the assessment processes, be it assessments are unable to account for material changes that may arise post-submission, including the introduction of new sensitive receptors or changes in population vulnerability. Public Health considers that whilst effort has been made to avoid and reduce impacts through scheme design and standard control measures, insufficient attention has been given to the latter stages of the mitigation hierarchy, namely monitoring, adaptive management, and responsive intervention. There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on community wellbeing. These include providing a 'relationship manager' role as a consistent, impartial, single point of contact for the	• Vulnerable groups have been appropriately identified and assessed in line with good practice; • The level of assessment is proportionate to the scale and nature of the Proposed Project; and • No additional measures are required beyond those embedded measures and additional REAC commitments already secured through the DCO (see details above for measures/commitments applicable to SEND and neuro diverse individuals). **Community Liaison** The Applicant will continue to employ a Community Relations Team throughout the Examination and into the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils, and the local community. The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. Community benefits are not a material planning consideration and are not mitigation for impacts identified as part of the planning process. In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. Additionally, the Applicant will continue to liaise with the local authorities on the management of potential effects on mental health and wellbeing. The additional bullet point requested to be added to commitment GG05 (Dealing with Public Interaction and Managing Confrontational Situations) of the REAC has been added. Specifically, this sets out the commitment to "*provide training for site staff, particularly those working in public facing roles or in areas near residential communities, on how to appropriately respond to confrontational behaviour, verbal abuse, or hostility from members of the public. This should include guidance on deescalation techniques, reporting procedures, and support available to staff who experience such incidents*."	

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			community, providing timely, high-quality, and accessible information on proposals, and engaging in face-to-face conversations with community leaders, parish councils, and the local community to guide them through what is a highly technical and complex process. The Council considers investment in local community assets, such as public spaces or village halls, as an effective approach to mitigation and compensation for the local community, whilst also helping to foster positive relationships with affected communities. Relevant assets should be identified in collaboration with the community itself. Helping the local community to better support its own mental health and wellbeing is also an effective mitigation measure. This could be achieved through provision of funding to local mental health organisations, funding Mental Health First Aid training for members of the community, and raising awareness of tools for maintaining wellbeing, such as East Suffolk Council's Well Minds resource. Whilst SCC welcomes the commitment within the REAC [APP-342] regarding community liaison, it is not sufficient to address the full range of community wellbeing and mental health impacts associated with the Proposed Project as set out in this chapter. To aid in mitigating these effects, community engagement should go beyond the REAC focus on providing information and a procedure for complaints. See paragraph 14.96 of SCC's LIR [REP1-130] for details on what SCC expects in terms of community engagement. SCC Public Health suggests an additional bullet point under GG05 'Dealing with Public Interaction and Managing Confrontational Situations'. The commitment should make provisions for providing training for site staff, particularly those working in public facing roles or in areas near residential communities, on how to appropriately respond to confrontational behaviour, verbal abuse, or hostility from members of the public. This should include guidance on deescalation techniques, reporting procedures, and support available to staff who experience such incidents.		
3.18.7	**Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health & Wellbeing [APP-058]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics,**	Assessment conclusions	SCC does not agree that mental health and wellbeing have been assessed as a distinct or substantive outcome within the Health and Wellbeing chapter [APP-058]. Given the scale, duration and cumulative context of the Proposed Project, the level of assessment provided is considered insufficient and risks materially under representing mental health impacts that may not immediately translate into service demand but nonetheless affect population wellbeing and quality of life. SCC further disagrees with the Applicant's conclusions relating to health service impacts. Whilst paragraph 11.9 of	**Health and Wellbeing Assessment Overview** The Applicant has undertaken a comprehensive assessment of mental health and wellbeing in alignment with IEMA guidance. The Applicant maintains its position that the Project will not give rise to significant residual effects on health and wellbeing, either in isolation or cumulatively, and that the assessment presented in **APP-058** is robust and proportionate. **Mental Health Services** The Health and Wellbeing assessment in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 [APP-058]**	Not Agreed

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	Recreation and Tourism [REP1A-005] **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**		[APP-058] recognises the potential for increased demand on GP practices, the assessment does not consider impacts on mental health services in sufficient depth, nor does it adequately address issues of service capacity, access or cumulative pressure. ccRegarding [APP-058], SCC Public Health challenges the assessment conclusion of 11.9.59, recognising the implications of 11.9.53, 11.9.54 and 11.9.56. It is suggested mitigations could be applied to 11.9.53 and 11.9.54 in the form of Mental Health and Wellbeing Monitoring Plan as previously described, and without further mitigations to 11.9.56, the assessment conclusion rating of 11.9.59, 11.9.85 and 11.9.86 should be raised. This should also be considered with respect to cumulative effects.ccSCC also has fundamental concerns regarding the robustness of the mental health baseline underpinning the assessment. Paragraph 11.7.21 of [APP-058] refers to mental health within Local Health Profiles but does not set out a defined, data-driven mental health profile. In the absence of a clearly evidenced baseline, SCC considers that the assessment lacks a robust benchmark against which to judge change, sensitivity or impact magnitude, increasing the likelihood that adverse effects have been underestimated. cc	explicitly considers mental health as part of a holistic approach to health, in line with WHO and IEMA guidance. Potential impacts on mental health services are captured within the assessment under the determinant "*Access to healthcare services and other social infrastructure*", which accounts for both primary care and mental health provision. The assessment recognises that construction and operation of the Proposed Project could generate anxiety or distress among local residents. Potential additional demand on healthcare services is considered, and even in a worst-case scenario, the GP:Patient ratio is predicted to remain broadly in line with recommended guidance in Section 11.7. This ratio originates from recognised guidance and it is applied as a conservative benchmark indicator, rather than a standalone measure of healthcare capacity or need. As such, the assessment in section 11.9 of "*Access to healthcare services and other social infrastructure"* draws on up-to-date public health, socio-economic, and environmental data, explicitly accounting for the older age profile of the local population and the presence of vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. Overall, any effects on health and wellbeing arising from increased demand on healthcare services or temporary reduced access to social infrastructure during construction are assessed as temporary and negligible (not significant). **Social Cohesion and Community Identity (conclusions of 11.9.59)** The determinant 'Social Cohesion and Community Identity' as defined in in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** considers the "*potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health*". This highlights that impacts on this determinant may arise through multiple channels, and therefore has been assessed by drawing on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. The health and wellbeing assessment firstly establishes the sensitivity of the population in relation to social cohesion and community identity. As set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, the population is considered to be of high sensitivity. This judgement reflects contextual factors including the rural character of the study area, the importance of the landscape to local identity, and baseline indicators indicating the sense of neighbourhood belonging compared to the national average.	

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				Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] identified significant residual landscape and visual effects for a number of viewpoints and local character areas, albeit **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** found no significant impacts on driver delay or community severance, and similarly **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** identified no significant effects on residential properties (in terms of physical changes or disruptions to residential communities) or the accommodation sector. Considering the evidence across the relevant topics, and applying professional judgement, the assessment concludes that the magnitude of impact on social cohesion and community identity is small for both the construction, and operation and maintenance phases of the Proposed Project across **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. This considers that while landscape and visual effects are an important consideration, they do not on their own indicate a loss of social cohesion or community identity across the wider area. Overall, the assessment of social cohesion and community identity is not a sum of its parts, it requires a balanced, holistic judgement of effects, including those found to be not significant, which ultimately supports the conclusion that the impact on social cohesion is minor adverse and not significant. The cumulative impact is also assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** to assess the impact of the Proposed Project in addition to other NSIPs and smaller applications. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. The conclusion reached reflects assessment in accordance with established guidance (IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, Determining Significance For Human Health In Environmental Impact Assessment November, 2022)), and represents a proportionate assessment of the likely impacts on community health and wellbeing. **Mental Health Baseline**	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				The Applicant refers to its response within 3.18.3 regarding its assessment of mental health and methodology applied.	
3.18.8	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7	Cumulative Effects - Impact on community wellbeing	It is important for the cumulative impacts to be considered. This area of Suffolk is facing a huge number of NSIPs, and the mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise, monitor and mitigate these effects on community wellbeing. SCC does not agree that the Applicant's cumulative effects assessments [APP-059 and APP-060] adequately support the conclusion that cumulative health and wellbeing effects, including mental health effects, would not be significant. SCC considers the approach taken to cumulative effects assessments is insufficiently precautionary and not reflective of the lived experience of communities exposed to repeated or prolonged infrastructure development. In SCC's view, the Applicant's approach treats individual environmental effects largely in isolation and does not adequately capture how multiple "minor adverse (not significant)" effects may interact spatially and temporally to produce materially harmful outcomes for mental health and wellbeing. This is particularly relevant in Suffolk, where multiple NSIPs are consented or anticipated, and where communities may experience sequential or overlapping disruption over extended periods. SCC considers that this compartmentalised approach risks systematically underestimating the severity, persistence and cumulative nature of health impacts, especially for more vulnerable populations.	The cumulative impact is assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]**, which assesses the impact of the Proposed Project in addition to other NSIPs and smaller applications within a study area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. The health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'. The Applicant recognises that the development, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health, recognising the impact that other projects may have had upon local residents. Throughout the development phase of the Proposed Project it therefore tried to clearly communicate the proposals, including through the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the Proposed Project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. In terms of working collaboratively to address this, the Applicant is engaging with other developers on an ongoing basis, including participation at the Energy Projects Forum hosted by East Suffolk Council. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in **Application Document 9.136 Applicant's Responses to Third Written Questions** in response to 3HW3. This response sets out the relevant measures secured through **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7, which address	Not Agreed

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				the management of potential impacts on health and wellbeing. The combination of embedded mitigation and additional community-focused measures ensures that any potential for disruption is minimised and that appropriate channels are in place to respond to any concerns that may arise.	

Table 3.19 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	Applicant's Current Position	Status
3.19.1	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7 **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7	Assessment methodology – WHO guidelines in assessment	The Consultee also recommends taking account of the World Health Organisation's guidelines on Air Quality. It would be remiss for the World Health Organisation guidance to not be referenced as its primary purpose is to protect public health as opposed to considering what is nationally achievable which is the case for the national statutory limits. In response to the growing body of evidence suggesting that the Statutory Air Quality Objectives are not enough to protect health, SCC would like to see an emphasis not just on complying with the Statutory Limits but also on bringing air pollution levels down as low as possible for the health and wellbeing of local residents. Should monitoring of pollution levels associated with this project show pollution levels increasing, even within Statutory Limits, it is recommended that remedial action is taken to ensure the levels of pollutants in the air continue to fall. The Council has also set out its position on this matter in Chapter 12 of its LIR [REP1-130], such as in paragraph 12.12.	The Applicant confirms that the air quality assessment for the Proposed Project has been carried out in accordance with the current legal requirements and relevant guidance, ensuring that all statutory obligations are met. The Applicant confirms that several measures have been proposed to minimise emissions including GG12, AQ04, AQ09, as outlined in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. Measures including encouraging the construction staff to use sustainable transport and monitoring HGV movements and compliance with HGV routes are also included in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7. As detailed in **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7, should monitored concentrations exceed the agreed thresholds, additional abatement controls would be implemented if required, or the site works may be temporarily stopped. Local Authorities will have access to real-time monitoring data throughout, as set out in measure AQ02 of **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7.	Agreed
3.19.2	**Application Document 9.83 (B) Code of Construction Practice [REP4-232]** **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Mitigation – Use of Non-Road Mobile Machinery (NRMM)	The Consultee advises that the appropriateness of measures controlling air quality generally defers to East Suffolk Council. The Council welcomes the commitment to seek to avoid the use of diesel or petrol-powered equipment. The Council requests further information on what circumstances determine whether this measure is practicable or not during delivery as there is concern over the vagueness of the current wording.	The Applicant confirms that East Suffolk Council's comments relating to air quality measures have been addressed. The Applicant confirms that, in relation to the commitment AQ04 which seeks to avoid the use of diesel or petrol powered generators, the words "where practicable" refers to circumstances where mains electricity or battery-powered systems cannot reliably meet the required construction power demand. Practicability will be determined based on: • Availability of a safe and reliable mains connection at the relevant stage of works;	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	Applicant's Current Position	Status
				• Technical suitability of battery or mains alternatives for the required load and duration; • Operational and safety requirements, including time-critical or emergency activities; and • Availability of charging capacity and battery units within the construction programme. The Applicant confirms that where a generator is required, its use will be limited to the minimum duration necessary.	
3.19.3	**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7 **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7	Mitigation – Construction Monitoring	The Consultee recommends more could be done with respect to the monitoring and mitigation of impacts on air quality as a result of construction operations and additional traffic – particularly around the primary school. The Consultee welcomes the installation of live pollution sensors to accurately monitor levels of all pollutants not just NO_2. The County Council has recommended more could be done to monitor and mitigate $PM_{2.5}$ implications deriving from the project. The Council considers that provision should be made for immediate action to be taken should exceedances of air quality be revealed during monitoring.	The Applicant commits to carrying out real-time monitoring of NOx, NO_2, PM_{10} and $PM_{2.5}$ before and during the construction phase as detailed in the Outline Air Quality Management Plan (**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7), as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7. The original monitoring locations have been discussed and agreed. In addition**,** two additional air quality monitoring locations have been included in the updated Outline Air Quality Management Plan – Suffolk. These are located at Whitearch Residential Park and Shotts Meadow and will measure NOx, NO_2, PM_{10} and $PM_{2.5}$. As detailed in **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7, should monitored concentrations exceed the agreed thresholds, additional abatement controls would be implemented if required, or the site works may be temporarily stopped. Local Authorities will have access to real-time monitoring data throughout, as set out in measure AQ02 of **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7.	Agreed
3.19.4	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Mitigation – $PM_{2.5}$	The Council has previously noted that the PEIR states 'It should be noted that the PM2.5 objective is a target value and is not in the 2010 regulations as a legal requirement to be achieved by local authorities. Please note the Environment Act 2021 established a legally binding duty on government to bring forward at least two new air quality targets in secondary legislation. This duty sits within the environmental target's framework outlined in the Environment Act (Part 1). The Council considers that the Applicant should seek to minimise pollutant levels beyond the legal limits on account of the evidence that such levels can pose significant health risks. As the Council is not the monitoring authority for Air Quality for the Suffolk Onshore Scheme, it cannot itself determine whether the measures set out by the Applicant will sufficiently minimise, monitor and mitigate effects to meet legal standards	Discussed and agreed, for the purposes of the assessment, the Limit Value for annual mean $PM_{2.5}$ ($20\mu g/m^3$) as set out in the Air Quality Standards Regulations 2010 has been used. The Applicant confirms that several measures have been proposed to minimise emissions including GG12, AQ04, AQ09, as outlined in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. Measures including encouraging the construction staff to use sustainable transport and monitoring HGV movements and compliance with HGV routes are also included in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7**.**	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	Applicant's Current Position	Status
			or to minimise pollutant levels below legal requirements to reduce harm.		
3.19.5	**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7 **Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074]** **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Mitigation – Dust management	Proposed mitigation measures in-line with the Institute of Air Quality Management best practice are welcome. The control document should ensure that should exceedances be discovered through monitoring, appropriate action is swiftly taken to mitigate.	A Register of Environmental Actions and Commitments (**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7) has been prepared for the DCO application, which includes proposed mitigation measures for air quality, which are in line with the Institute of Air Quality Management construction dust guidance. In addition, an Outline Air Quality Management Plan (**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7) has been prepared for the DCO Application. This includes mitigation and control measures relevant to air quality including dust during the construction phase and proposed air quality monitoring locations during the construction phase. Should monitored concentrations exceed the agreed thresholds, additional abatement controls would be implemented if required, or the site works may be temporarily stopped. The Outline Air Quality Management Plan is secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7**.**	Agreed
3.19.6	**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7 **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	Mitigation – Minimise levels of pollutants	An increase in traffic will lead to an increase in harmful pollutants. The Council will continue to emphasise that pollution, even at low levels and on a temporary basis, can impact health and therefore expects to see every effort made to keep levels as low as possible to protect the health and wellbeing of local communities. Every effort should be made to minimise levels of air pollutants such as by committing to ensure the engines of vehicles are switched off whilst idling.	The Applicant confirms that several measures have been proposed to minimise emissions including GG12, AQ04, AQ09, as outlined in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. Measures including encouraging the construction staff to use sustainable transport and monitoring HGV movements and compliance with HGV routes are also included in **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7**.** The Applicant confirms that measure GG12 included within the Register of Environmental Actions and Commitments (**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7) commits to ensuring all vehicles switch off engines when not in use and when it is safe to do so. It should be noted that the measure has been adapted from the Institute of Air Quality Management construction dust guidance, as there may be rare occasions where switching off a vehicle engine could compromise safety.	Agreed
3.19.7	**Application Document 7.5.1.1 (F) Outline Construction Traffic**	Mitigation –	Vehicle Emission controls should be included in the OCTMP	A Traffic Management and Monitoring System is proposed as set out in the Outline Construction Traffic and Management and Travel Plan (CTMTP) for Suffolk (**Application Document 7.5.1.1**	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	SCC Current Position	Applicant's Current Position	Status
	Management and Travel Plan – Suffolk, submitted at Deadline 7 **Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Vehicle emission controls		**(F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7) to monitor HGVs and the use of authorised construction routes. As detailed in the Outline Air Quality Management Plan (**Application Document 7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk**, submitted at Deadline 7), all HGVs will be checked to ensure they meet the Euro VI Standard, and a log will be made as part of the monitoring requirements. All management plans are secured by Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7. Vehicle emission controls are included in the **Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk**, submitted at Deadline 7	

Table 3.20 Emergency Planning

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.20.1	**Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7	Emergency planning	Due to the Sea Link proposals being within 10 km of the Extended Emergency Planning Zone for Sizewell B power station, an emergency plan for the construction of Sea Link would be required prior to commencement. This would cover arrangements for protecting construction staff during any site or radiation emergency, and would show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B. SCC welcomes the production of an emergency planning document, but the current commitment is not sufficient. SCC refers the Applicant to paragraphs 15.66 to 15.70 of SCC's LIR [REP1-130] which gives the Council's position on the necessity of a requirement to be included in the DCO for the production and approval of this plan prior to commencement. As things currently stand, the Applicant agrees that the document should be produced but the application appears to lack any legal mechanism requiring the plan's production and approval. A DCO requirement for this plan to be submitted and approved prior to commencement is therefore necessary. SCC has suggested that this requirement could mirror the one included in the EA1N and EA2 DCOs referenced in paragraphs 15.69 and 15.70 of SCC's LIR [REP1-130].	The Applicant has been in correspondence with SCC's Emergency Planning team to discuss the emergency planning document in respect to the Proposed Project's interaction with the Suffolk Radiation Emergency Plan. A meeting was held on the 19 August 2024. It was agreed that the required document would be produced post DCO submission and pre commencement of construction. The Applicant plans to be in contact with Emergency Planning team early in 2026 to commence this process. The Applicant has provided commitment GG41 in **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7. This was updated at Deadline 7 to the following wording: *Pre-commencement:* *(1) Any notification of the anticipated programme for pre-commencement operations provided under Requirement 4(1) must also be submitted to the Duty Holder at least 28 days in advance of those operations taking place. Any such notification must detail how the undertaker, in carrying out the specified pre-commencement operation(s), will:*	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			SCC has submitted Requirement wording at Deadline 6 [REP6-237] for the DCO and commitment wording for the REAC to cover emergency planning for pre-commencement operations. If these commitments are secured, this item can be considered resolved. SCC understands that this wording is to be included in the Applicant's draft DCO and REAC respectively at Deadline 7. On this basis, SCC considers this item 'agreed'.	*1. Protect all members of the workforce involved in any activity pursuant to the specified operation(s) during a radiation emergency* *2. Implement emergency and evacuation procedures if notified of a radiation emergency* *3. Maintain open line(s) of communication with the Duty Holder such that any communication from the Duty Holder regarding a radiation emergency event will be received without delay and the undertaker's emergency procedures for a radiation emergency are implemented without delay* *(2) The details submitted pursuant to sub-paragraph (1) must demonstrate, to the reasonable satisfaction of the Duty Holder, that the activities undertaken in relation to the specified pre-commencement operation(s) will not prevent, hinder or otherwise interfere with the Duty Holder's ability to implement the Suffolk Resilience Forum Radiation Emergency Plan in the event of a radiation emergency.* *(3) For the purposes of this commitment, "the Duty Holder" means "the Duty Holder" as defined within the Radiation (Emergency Preparedness and Public Information) Regulations 2019(a) as amended from time to time.* The Applicant will prepare a Suffolk Resilience Forum Radiation Emergency Plan (SRFREP) in accordance with the requirements of the Suffolk Resilience Forum and the Radiation Emergency Preparedness Regulations. The plan will be prepared in conjunction with the Suffolk Resilience Forum and will be submitted to Suffolk County Council for review.	

Table 3.21 Decision Making, Policy, need, site selection and design

Ref	Relevant Application Document	Summary of Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.21.1	**N/A**	Policy	It is common ground between SCC and the Applicant that the Proposed Project is the subject of a Section 35 Direction and that in these circumstances NPS EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy. It is also SCC's position that the Council's Local Impact Report has a particular status in the decision making process as under Sections 104(2)(b) and 105(2)(a) of the Planning Act the	Agreed.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
			Examining Authority and the Secretary of State must have regard to any LIR submitted when deciding the application. Development Plan policies are also 'important and relevant' considerations in the determination of the DCO Application.		
3.21.2	**N/A**	Need	SCC does not take a position on the need (or otherwise) for the Proposed Project and has not challenged the application on this basis. SCC considers that this is a matter for the decision maker to take a view on and that this view should be taken in accordance with the relevant tests for need that are set out in National Policy Statement EN1. Notwithstanding that SCC does not have a position on need, the Council's view is that if there is a need for the Proposed Project this need alone does not comprise a justification for the Applicant's proposed working hours which have to be justified on their own merits. SCC did query the Applicant's claim that the project is planned to be operational by 2030 which was not part of the Applicant's need case in [APP-320] during ISH 3 and in SCC's summary of oral submissions at that hearing [REP6-181]. There, SCC also queried the Applicant's assertion of constraint costs which may be caused by restricted working hours which were not justified by the Applicant. Nor does SCC consider the Applicant's need case to justify the lack of provision of any other mitigation measures which are necessary to make the application acceptable in planning terms, including in terms of meeting the requirements of the mitigation hierarchy.	The Applicant accepts SCC's position on need and considers that the relevant test for assessing need for the Proposed Project are those set out in Part 3 of NPS EN-1, particularly para 3.3.78. The Applicant's position on working hours is set out above.	Agreed
3.21.3	**Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**	Site selection process	The Consultee reviewed the Option Selection and Design Evolution report (**Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**) during the Statutory Consultation period. In its Statutory Consultation response, the Council noted that whilst the previous and unacceptable options, which were included in the non-statutory consultation, have been discarded, the option put forward still has significant challenges. The Council continues to disagree with aspects of site and route selection such as the access options. SCC has not objected to the scheme on the basis of site selection. However, this should not be interpreted as an active endorsement for site selection by SCC. On the basis that SCC has not objected to site selection, this matter is considered resolved with the exception of the Applicant's access route choice.	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023, included as part of Statutory Consultation (**Application Document 8.2 Options Selection and Design Evolution Report (October 2023)**) is agreed.	Agreed (except for selection of access route options)

3.3 Matters that have been agreed prior to Deadline 5

Table 3.22 Matters that have been agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.22.1	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**	Historic Surface Water Flooding	Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors and the current Flood Risk Assessment does not adequately demonstrate this. The FRA now does reflect and acknowledge this.	The flood risk sensitivity and history of flooding at Friston is detailed in **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**. The Flood Risk Assessment (FRA) (Table 4.1) references the Friston Surface Water Study (BMT, 2020) and also provides information from a review of relevant S19 flood investigation reports. An extract of the modelling data outputs from the BMT study is presented in Plate 4.1 of the FRA, and the data has been used to inform the assessment of surface water flood risk during construction and operation of the Proposed Project (Section 4 of **Application Document 6.8 (B) Flood Risk Assessment [REP6-052]**).	Agreed
3.22.2	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** **Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 7	Drainage and mitigation	The Council LLFA have also produced a Surface Water Study for the Friston catchment, which will assist the Applicant in assessing existing surface water flood risk in the area. This has been considered in the Applicant's FRA.		Agreed
3.22.3	N/A	Kiln Lane Substation drainage strategy	For the Kiln Lane substation, in Scenario 2, the Applicant's Surface Water Drainage Strategy should be aligned with the one pursuant to EA1N/EA2 OWFs.	The Applicant committed to aligning this Drainage Strategy to SPRs.	Agreed
3.22.4	N/A	Sequential Cumulative Effects – Landscape and Visual effects	The Consultee agreed to the approach for assessing sequential visual effects in relation to cumulative effects via email sent on 30 January 2025.	It was discussed in the 27 February 2024 meeting that the ES chapter would assess sequential visual effects in relation to cumulative effects, as requested by stakeholders at Statutory Consultation. This would be proportionate based on the information available at the time of writing. A list of key routes in the area was put forward to the Consultees for comment. It was also explained that landscape cumulative assessment covers indirect and direct effects on perceptual qualities, so it is considered that landscape sequential effects have been covered.	Agreed
3.22.5	**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048] Application Document**	Landscape and Seascape Character baseline	The Consultee raised no concerns on the baseline of the landscape assessment as set out in the PEIR and acknowledged that the ES will provide further information. Landscape character receptors – SCC confirmed it defers this to ESC.	The Landscape Character Areas (LCAs) and Seascape Character Areas (SCAs) were set out in the baseline section of the PEIR. The Statutory Consultation responses required further detail of the key characteristics of the LCAs and SCAs which is included within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape**	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]		Seascape Character receptors - the Consultee stated that they have no objections in email sent on 18 June 2024 and confirmed this via email on 30 January 2025.	**Designation and Landscape Character Assessment – Suffolk [APP-097]**.	
3.22.6	**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**	Study Area	Following discussions and correspondence during 2024 the Consultee agreed the study area via email on 30 January 2025.	The Study Area is set out within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The study area comprises an area of 3 km from the Order Limits surrounding the proposed Saxmundham Converter Station and Friston Substation and 1 km from the Order Limits around the proposed landfall and HVDC and HVAC cable corridors.	Agreed
3.22.7	**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]** **Application Document 9.83 (B) Code of Construction Practice [REP4-232]**	Scope out Year 15 effects for cable routes and landfall	The Consultee agrees to the approach to Year 15 effects for cable route and landfall based on assumption that all landscape restoration works have been wholly successful. Adequate provision should therefore be included in the relevant control document to guarantee that the growth of planting assumed for the assessment at Year 15 is reached or surpassed.	It was queried in the 27 February 2024 meeting as to why the Consultees felt that year 15 effects on cable routes and the landfall are required as significant effects are not expected at year 1 and full reinstatement will occur after construction with reasoning given in the circulated meeting minutes. The Consultees requested that year 15 effects are still reported on, which The Applicant agreed to and is included in the ES (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape & Visual [APP-048]**). The Applicant agreed to include this reinstatement commitment in the ES at the request of the Consultees. Land used temporarily will be reinstated where practicable to its pre-construction condition and use, unless agreed otherwise.	Agreed
3.22.8	**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**	PEIR Photomontage methodology	The Consultee agreed the methodology used in the assessment via email on 30 January 2025.	The Photomontage methodology was updated following the PEIR and used for photomontages which have been prepared for the ES (**Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**). This methodology has been agreed by the Parties.	Agreed
3.22.9	N/A	Visual Amenity baseline – Representative vs Illustrative Viewpoints	Viewpoint illustrations being necessary was agreed in the 27 February 2024 meeting.	The 27 February 2024 meeting discussed whether illustrative viewpoints would be considered. It was set out that representative viewpoints are felt to be appropriate with reasoning given in the circulated meeting minutes.	Agreed
3.22.10	**Application Document 6.3.2.1.A ES**	Presentation of the Visual Assessment	The Consultee agreed to the approach proposed by the Applicant in the 19 November 2024 meeting regarding the presentation of the	In response to SCC's request to present the visual appendix in the style that was used for the Bramford to Twinstead DCO, which presents the baseline and assessment along with photography, The Applicant	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology[APP-095] **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**	Appendix of the ES	visual assessment appendix of the ES in an email on 14 February 2025.	presented this to Consultees at the thematic meeting held on 19 November 2024. This is set out in the **Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**.	
3.22.11	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order** submitted at Deadline 7	Skylark nesting	The survey findings are consistent with Consultee's understanding of skylark presence in the local area. The proposed mitigation is in line with recommendations made by the Consultee i.e. skylark plots. SCC recognises the mitigation for skylarks which could benefit other farmland bird species	Bird surveys have recorded many nesting skylarks in fields across the survey area. Mitigation is included within the DCO Order Limits in the form of a field for delivery of skylark plots at twice the rate required by Countryside Stewardship. This is secured within Requirement 6 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7, within the oLEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk,** submitted at Deadline 7). There are no plans to implement specific mitigation for other farmland bird species. Although bullfinch and meadow pipit territories were recorded in the 2024 surveys, the survey area is much larger than the Order Limits and the species were not recorded within the Order Limits or were recorded in the RSPB reserve where they will not be affected by surface works. While a small number of yellowhammer territories have been recorded in the areas of permanent habitat loss, this is far fewer than the number of skylark territories, hence the focus on skylarks. However, the 12ha arable field managed favourably as mitigation for skylarks would also benefit other farmland birds such as yellowhammer e.g. through retention of winter stubble (where spring cereals are sown) and creation of fallow plots of value for foraging in winter cereals.	Agreed
3.22.12	**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7 **Application Document**	Hedgerow survey	It was requested that when undertaking hedgerow surveys, National Grid should not simply report 'units' but quantify extents e.g. in square metres. It was noted that in addition to the standard botanical and historical criteria for defining 'Important Hedgerows' Suffolk has developed some additional criteria. These were subsequently confirmed to be '200 (or more) bat passes, or 5 (or more) barbastelle passes, in a single survey'. This is used to identify hedgerows that would justify additional mitigation measures (e.g. further narrowing of the corridor width and use of temporary features like hazel hurdles to fill gaps	Approach to hedgerow survey confirmed and data shared with the Consultees. Each specific important hedgerow has been identified in DCO documentation (**Application Document 6.3.2.2.A (B) ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]**) including using the additional criteria identified by the Consultees. Impacts are quantified in extent (i.e. metres). In order to enable gaps to be closed for bats, crossing methods suggested by the Consultees including hurdles to be placed at night have been included in the Outline LEMP (**Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**, submitted at Deadline 7).	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	6.3.2.2.A (B) ES Appendix 2.2.A Phase 1 Habitat Survey Report [AS-004]		overnight). It should be noted there is also a criterion in the latest Bat Conservation Trust survey guidance.		
3.22.13	N/A	Timing of archaeological works	As has been shown by other NSIPs in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule. Numerous large projects taking place in the county at the same time is putting significant pressure on available archaeological work forces, therefore SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity.	Noted, no further response required.	Agreed
3.22.14	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7	Ground Investigation Works	Agreed approach prior to works starting in 2023, with the Consultee approving an Outline Written Scheme of Investigation (OWSI) produced by the archaeological subcontractor (Headland).	Email correspondence throughout 2022-2023 to agree location of GI works to avoid heritage assets/areas of archaeological potential and also agree the level of monitoring required.	Agreed
3.22.15	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7 **Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]**.	Geophysical Survey scope	Suffolk County Council approved Geophysical Survey Written Scheme of Investigation (WSI) September 2023 (**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**) and are generally happy with the scope of geophysical survey proposed/undertaken so far. SCCAS are happy to approve this additional appendix to the previously approved and submitted geophysical survey report [CR1-057].	Agreed through discussions in early 2023, and via a Written Scheme of Investigation approved September 2023. The scope of subsequent geophysical surveys in the area mentioned was agreed and has now been undertaken. The results of the geophysical survey are presented in **Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]**.	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
3.22.16	N/A	Assessment of effects at statutory consultation	Acknowledged the approach to the assessment of effects at statutory consultation within their response to the PEIR.	The assessment of effects on Cultural Heritage were presented within the PEIR. The PEIR is a preliminary assessment, and effects were further assessed with more detail within the ES chapter in line with the methodology and professional judgement.	Agreed
3.22.17	**Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk**, submitted at Deadline 7 **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7	Archaeological Evaluation Trenching	The Consultee agrees that the approach to approving the archaeological trial trenching will be through a Written Scheme of Investigation to be produced by the archaeological subcontractor.	Works associated with undertaking the archaeological trenching to be fully agreed by a Written Scheme of Investigation (**Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI)- Suffolk [APP-343]**) as secured by Requirement 14 of Schedule 3 of **Application Document 3.1 (J) draft Development Consent Order**, submitted at Deadline 7**.** This will be produced by the archaeological subcontractor and sent to SCC for approval.	Agreed
3.22.18	**Application Document 6.8 (B) Flood Risk Assessment [REP6-052]** **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7	Methodology used for the initial sizing of drainage features	Having reviewed the FRA, SCC is content with the methodology used for the initial sizing of drainage features at this time.	As detailed in section 5 of **Application Document 9.17.1 (C) Suffolk Drainage Strategy**, submitted at Deadline 7 infiltration testing results from surveys undertaken on behalf of SPR in 2024, provide the necessary justification for adopting a solely infiltration-based approach for the discharge of surface water from the proposed Friston substation site, consequently eliminating the previous hybrid design of an infiltration pond with an overflow outfall. The Applicant is aware that SPR have undertaken further ground investigation and are currently undertaking detailed design for the drainage for the Friston Substation (Kiln Lane) and EA1N and EA2 substations. The Applicant will continue to liaise with SPR and will take into consideration the development of their drainage proposals should SPRs work cease and the Proposed Project is required to bring forward Friston Substation in isolation. In terms of the area for drainage, the Proposed Project's Order Limits includes sufficient space for the Friston Substation drainage including infiltration assets, noting that this drainage footprint would be expected to be smaller than the drainage works for SPR as they are looking to drain three substations and that SPR's proposals included for a potential AIS NGET substation which would be significantly larger than the GIS substation proposed by the Proposed Project.	Agreed
3.22.19	**Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic**	Traffic and Transport Assessment:	The Consultee expects the construction of the cable route to affect the Sandlings Walk in several places, as well as other connected footpaths. The Council supports Sandling Way now being included.	Sandlings Walk has been included in the assessment of national/ regional walking and cycling routes in **Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The likely impact of the Proposed Project on Severance, Pedestrian Delay, Non-Motorised User Amenity and Fear & Intimidation for Sandlings Walk	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	and Transport [APP-054] **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]**	Public Rights of Way		(as well as other walking routes) as a result of construction traffic is considered to be not significant based on the assessment criteria. The section of Sandlings Walk which runs along a bridleway (PRoW E-354/002/0) has also been assessed within **Application Document 6.2.2.7 ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and measures relating to PRoW E-354/002/0 are set out within **Application Document 7.5.9.1 (B) Outline Public Rights of Way Management Plan – Suffolk [REP6-086]**.	
3.22.20	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**	Consideration of Suffolk Coast Path and Sandlings Walk	The Council welcomes the inclusion of the King Charles Coast Path in document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk in sections 4.2, table 4.2 and table 5.1, however there are two other promoted routes which should be considered and impacts assessed, the Suffolk Coast Path not yet fully superseded by the Kings Charles Coast Path), and the Sandlings Walk, as these are tourist routes, as well as local amenity and routes for health and wellbeing. The Council now recognises that these routes have now been assessed as part of the Environmental Statement.	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** assesses potential effects of the Proposed Project on PRoW and recreational routes, including the Suffolk Coast Path and the Sandlings Walk. As set out in paragraphs 10.9.37 to 10.9.38, the Suffolk Coast Path would be crossed by the Suffolk Onshore Scheme during construction, as the trenchless HVDC alignment crosses the route. Additionally, permanent access along the HVDC alignment is required by foot and/or quad bike on an annual basis for monitoring purposes during construction and operation. Given the HVDC installation would be trenchless below ground level, this crossing would not impact the Suffolk Coast Path. Movements on the permanent access route are expected to be infrequent in the context of the duration of the operational and maintenance phase, and therefore will have a negligible impact. Overall, this results in a permanent negligible socio-economic effect on the Suffolk Coast Path which is not considered significant. Sandlings Walk is considered within **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** but there would be no impact on the Sandlings Walk arising from the Proposed Project. Paragraph 10.9.101 notes that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of private, community, recreational and tourism assets within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. For PRoW, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, this considers the "*potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health*". This assessment draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
				effects on social cohesion and community identity, including amenity impacts on PRoW and other recreational receptors.	
3.22.21	N/A	Status of National Policy Statements for Energy	The status of the NPSs were agreed by the Consultee as per the statutory consultation (statutory consultation response paragraph 2.2: "*The Government issued the revised version of the National Policy Statements on 22 November 2023, with the amendments having full effect in relation to 'those applications for development consent accepted for examination, after the designation of those amendments', which will include the Sea Link proposals*.")	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5). The relevant Energy NPSs form the primary decision-making framework for the DCO application.	Agreed
3.22.22	N/A	Status of Local Development Plan policy	The Suffolk Minerals and Waste Local Plan (adopted 9 July 2020) is the currently adopted local minerals and waste plan for Suffolk.	Whilst the DCO application is required to be determined in accordance with the relevant NPSs, the SoS may consider Local Plans to be important and relevant to their decision making. The Local Plans for ESC and SCC are set out in their respective positions. In accordance with paragraph 4.1.15 of NPS EN-1, in the event of a conflict between NPS policy and local planning policy, the NPS will prevail for the purpose of SoS's decision making.	Agreed
3.22.23	N/A	Local Plan allocations	Areas of the draft Order Limits are within Mineral Consultation Areas identified on the Suffolk Minerals and Waste Local Plan (adopted 9 July 2020) Mineral Safeguarding and Proposed Sites Map	The Development Plan allocations identified in ESC and SCC's position columns are located within the draft Order Limits.	Agreed
3.22.24	**Application Document 5.1.6 Appendix E Statutory Consultation [APP-309]**	Need for the project	The Consultee agrees with the need for the Proposed Project as set out in the Consultee's response to the Statutory Consultation received by National Grid on 17 December 2023.	The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons: 1) the existing transmission network was not designed to transport electricity from where The Applicant increasingly now generate it (largely offshore) 2) the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport 3) as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses 4) upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards. The Proposed Project is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future.	Agreed
3.22.25	**Application Document 8.3 Strategic Options Report (October 2023)**	Strategic Options	The Consultee has reviewed the strategic options appraisal presented in the Strategic Option Report, Version A (**Application Document 8.3 Strategic Options Report (October 2023)**) and agree with the approach and conclusions.	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, version A, October 2023, (**Application Document 8.3 Strategic Options Report (October 2023)** included as part of Statutory Consultation, is agreed.	Agreed
3.22.26	**Application Document 5.1**	Consultation Strategy	Agreed	The Consultation Strategy has been prepared taking account of input from the Consultees. The final version was issued to the Consultees on	Agreed

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	Applicant's Current Position	Status
	Consultation Report [CR-069]		The Council has since noted (e.g. in paras 3 and 15 of [RR-5209] that it has been disappointed with the quality of engagement with stakeholders during the pre-application phase and continues to emphasise the importance of effective and meaningful engagement with local authorities and local communities affected by the project.	20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	
3.22.27	**Application Document 5.1 Consultation Report [CR-069]**	Consultation Zones	Agreed	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory.	Agreed
3.22.28	**Application Document 5.1 Consultation Report [CR-069]**	Statement of Community Consultation	Agreed	The Consultees were consulted by The Applicant on the Statement of Community Consultation and The Applicant had regard to those comments.	Agreed

4. Approvals

Signed	[redacted]
On Behalf of	Suffolk County Council
Name	[redacted]
Position	National Infrastructure Planning Manager
Date	05.05.2026

Signed	[redacted]
On Behalf of	National Gird
Name	[redacted]
Position	Senior Consents Officer
Date	05.05.2026

5. References

Defra & Welsh Government. (2025). Agricultural Land Classification fo England and Wales. Guidelines for grading the quality of agricultural land (JP069). Retrieved from https://publications.naturalengland.org.uk/publication/6257050620264448

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

Appendix A

Record of Engagement

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

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

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

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

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

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

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

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

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

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

Date	Topic/Engagement type/Attendees	Discussion points
		2 and Design Freeze 3 were discussed. A request was made to NE that management prescriptions be provided for Sandwich Bay to Hacklinge Marshes SSSI required for the site to meet favourable condition
08 August 2024	*SCC, ESC and National Grid - Project Update Meeting.*	*Project update and timeline, thematic meetings, PPA, masterplanning*
22 August 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The oLEMP draft structure was shared with both ESC and SCC by National Grid for agreement.*
27 August 2024	*SCC, ESC and National Grid – Landscape and Visual meeting*	*Project update and timeline, draft photosheet format, viewpoint plans, and growth rates issued on 2 August 2024, LVIA updates, Friston scenarios, update on AONB, update on Design Council and Design Principles,*
06 September 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Suffolk Landscape and Visual Value document and the sensitivity ratings were shared with ESC and SCC by National Grid for agreement.*
10 September 2024	*SCC, ESC and National Grid – Representative Viewpoints Meeting*	*Discussion regarding landscape viewpoints, River Fromus Bridge Crossing.*
10 September 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Representative Viewpoints were shared with ESC and SCC by National Grid for agreement.*
10 September 2024	*Suffolk & Essex Coast & Heaths National Landscape Partnership and National Grid Meeting*	*Engagement with National Landscape Partnership in regard to how the s85 enhanced duty requirement would be met*
12 September 2024	*SCC, ESC and National Grid – Project Update Meeting*	*Project update and timeline, thematic meetings, PPA, masterplanning*
17 September 2024	*ESC NSIP Working Group and National Grid Meeting*	*Senior project team presented to a cross-party group of councillors and planning officers. Discussions*

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

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

Date	Topic/Engagement type/Attendees	Discussion points
		requested to be provided within 3 days post meeting.
25 November 2024	*SCC and ESC Letter – Follow-up from DRP feedback*	*Joint letter from SCC and ESC with comments on the feedback from the Design Review Panel (DRP) and masterplanning.*
27 November 2024	*National Grid, ESC and SCC – Socioeconomics, Recreation and Tourism Information shared (via email)*	*The PRoW Technical Note was shared with both ESC and SCC by National Grid for feedback and comment on the approach within the Technical Note.*
27 November 2024	*National Grid ESC and SCC – Landscape and Visual Information (via email)*	*The Landscape and Visual Impact methodology was shared with ESC and SCC by National Grid for agreement.*
November 2024	*National Grid, ESC and SCC – Ecology Information*	*A summary of the impact assessment and proposed mitigation for Suffolk (not part of the DCO documentation but used as the basis for the Suffolk ES chapter) was presented to ESC and SCC by National Grid for information.*
December 2024	*National Grid, ESC and SCC documents and information shared (via email)*	*The revised requirements for the draft DCO and a table setting out how National Grid had addressed comments on the draft DCO received from ESC and SCC by the end of October 2024 were shared with ESC and SCC for review and comment by National Grid.*
09 December 2024	*SCC, ESC and National Grid - Meeting to follow-up on DRP (held on 05 November).*	*Discussion on masterplanning, design review panel meeting and design principles document.*
11 December 2024	*SCC, ESC, NE and National Grid - Terrestrial Ecology Thematic Meeting (Suffolk proposals)*	*Approach to Biodiversity Net Gain. Key changes since the last meeting, particularly as a result of DF4. Alternative construction compound locations north of the Converter Station site and presence of Important Hedgerows. SCC indicated a concern over the effect of compound S04/S05 on the nearby Important Hedgerow.*

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

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

Date	Topic/Engagement type/Attendees	Discussion points
		Representation comments from ESC and SCC.
23 October 2025	*SCC, ESC and National Grid*	*Noise thematic meeting*
22 January 2026	*SCC, ESC and National Grid*	*In person meeting to discuss the outstanding matters relating to Traffic and Transport.*
24 February 2026	*SCC, ESC and National Grid*	*Traffic and Transport thematic meeting*
30 March 2026	*SCC, ESC and National Grid*	*Traffic and Transport thematic meeting*

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