

NORWICH TO TILBURY

EN020027

Comments on Submissions received at Deadline 1

Suffolk County Council [REDACTED]

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Glossary of Acronyms

<i>AIL</i>	<i>Abnormal Indivisible Load</i>
<i>CTMP</i>	<i>Construction Traffic Management Plan</i>
<i>CAA AAT</i>	<i>Civil Aviation Authority Airfields Advisory Team</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>GAAC</i>	<i>General Aviation Awareness Council</i>
<i>MRN</i>	<i>Major Road Network</i>
<i>NGET</i>	<i>National Grid Electricity Transmission or “the Applicant”</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PHM</i>	<i>Population Health Management</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>

“BDC” refers to Babergh District Council; “MSDC” refers to Mid Suffolk District Council; “BMSDC” refers to BDC and MSDC jointly; “SCC” refers to Suffolk County Council; and “the Councils” refers to BDC, MSDC, and SCC jointly.

Purpose of this Submission

The document has been prepared by Suffolk County Council to respond to the Applicant’s submissions, and where appropriate representations made by other interested parties, received at Deadline 1 (“**D1**”) for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

Comments on submissions received as Additional Submissions

Table 1: 6.11.A4 (B) Environmental Statement Appendix 11.4 – Geophysical Survey (Priority Areas) Results Report [AS-072]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
1.1	Archaeology	<p>3. Aims, Methodology & Presentation</p> <p>3.1. Aims and Objectives</p> <p><i>“The principal objectives of the programme of geophysical (magnetometer) survey were to gather information to establish the presence/absence, character and extent of any archaeological remains initially within the Geophysical Priority Areas but also within the wider Order Limits of the Project. This information will form the Environmental Impact Assessment (EIA), i.e., as part of the Environmental Statement Chapter (ES; National Grid forthcoming) and any possible further investigation strategies.</i></p>	<p>Geophysical survey can detect anomalies that may indicate buried archaeological features, but it cannot, on its own, establish the presence/absence, character, or full extent of archaeological features or deposits. Geophysical results should therefore be treated as interpretative evidence that requires targeted intrusive investigation and specialist recording to confirm significance, character, date, extent and state of preservation. Geophysical data must not be treated as negative evidence and the absence of anomalies does not prove that archaeological features are absent (Schmidt et al 2015).</p> <p>Please see extracts from The Chartered Institute for Archaeologists Standard and guidance for archaeological geophysical survey:</p> <p>“Definition of geophysical survey</p> <p>Archaeological geophysical survey uses non-intrusive and non-destructive techniques to determine the presence or absence of anomalies likely to be caused by archaeological features, structures or deposits, as far as reasonably possible, within a specified area or site on land, in the inter-tidal zone or underwater. Geophysical survey determines the presence of anomalies of archaeological</p>	<p>Schmidt et al 2015</p> <p>CIfA 2020</p>

		<p><i>The aim of the survey were:</i></p> <ul style="list-style-type: none"> • <i>To provide information about the nature and possible interpretation of any magnetic anomalies identified.</i> • <i>To therefore determine the likely presence/absence and extent of any buried archaeological features; and</i> • <i>To produce a comprehensive site archive and report.”</i> 	<p>potential through measurement of one or more physical properties of the subsurface” (ClfA 2020, pg4).</p> <p>“Purpose of geophysical survey</p> <p>A survey undertaken to the Standard will as far as possible inform on the presence or absence, character, extent and, in some cases, apparent relative phasing of buried archaeology, in order to make an assessment of its merit in the appropriate context, which may lead to one or more of the following:</p> <ol style="list-style-type: none"> a. the formulation of a strategy to ensure further recording, preservation or management of the resource b. the formulation of a strategy to mitigate a threat to the archaeological resource c. the formulation of a proposal for further archaeological investigation within a programme of research” (ClfA 2020, pg4) <p>Therefore, this paragraph needs to clearly state that the results of the geophysical survey will be used in conjunction with the trial trenching results of the priority areas to inform a programme of archaeological mitigation for the priority areas.</p> <p>Schmidt, A., Linford, P., Linford, N., David, A., Gaffney, C., Sarris, A. & Fassbinder, J. (2015) EAC Guidelines for the Use of Geophysics in Archaeology: Questions to Ask and Points to Consider. EAC Guidelines 2. [online]. Available at: Historic England [accessed 27th February 2026]</p>	
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<p>1.2</p>	<p>Archaeology</p>	<p>3.2 “... <i>Magnetometry is the most widely used geophysical technique in archaeology as it can quickly evaluate large areas, and under favourable conditions, identify a wide range of archaeological features including infilled cut features ...</i>”</p>	<p>Magnetometer survey is a useful, non-invasive technique for archaeological prospection, but it has limitations that must be stated so results are not over-interpreted.</p> <p>The chosen technique for this project is magnetometry, a rapid, cost-effective method well suited to large scale projects. Magnetometry can identify anomalies consistent with geological, archaeological, or modern features, but it cannot reliably distinguish their source or absence without ground-truthing (trial trenching or geoarchaeological investigation).</p> <p>This is because magnetometry detects only those features that produce sufficient magnetic contrast with the background geology and is suited to detecting large features or features with sufficiently magnetic fills to be detected above the natural variability, it is therefore biased toward larger or trending linear anomalies. For example, if a feature has been backfilled with soil from the immediate source area, magnetic contrast between fill and geological background may be very low and indistinguishable from random soil variation. Alternatively, fills altered by heating, organic decay, compaction or mixing with different materials often show enhanced magnetic responses and are more readily detected. As a result, larger features (ditches, pits, hearths, kilns) may be detectable, while smaller features and deposits lacking magnetic enhancement, particularly pre-Iron Age sites and ephemerally occupied sites, and burials are usually missed by magnetometry.</p> <p>It does not, on its own, establish the presence or absence of archaeological feature or reveal the archaeological significance, function, date, depth, or state of preservation of those anomalies it</p>	
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			<p>does identify. But provides useful information for sites where early trial trench evaluation should be undertaken to inform development.</p> <p>Therefore, geophysical survey on its own cannot be used to establish the presence/absence of archaeology within any given area.</p>	
1.3	Archaeology	<p>5. Conclusion</p> <p><i>“...The magnitude and resolution of the anomalies identified throughout the project indicates that there was likely sufficient magnetic contrast for the detection of sub-surface archaeological features, if present, notwithstanding the limitations of magnetometer survey to identify certain types, sizes and periods of archaeological features.”</i></p>	<p>This risks over stating the capabilities of magnetometer survey unless the report also explains what is not detectable. A better, balanced statement should acknowledge that apparent good resolution does not guarantee detection of all feature types, and depth, deposits and local environment (alluvium and peat) can severely reduce detection of anomalies that could be detected elsewhere on different geologies.</p> <p>Within the report there are three occasions where it mentions there are limitations to magnetometer survey, but it does not detail what these limitations are.</p> <p>This is particularly important to understand the limitations of the survey technique within the river valleys of the Waveney, Gipping and Stour as detection in deep colluvium, alluvial and peat deposits is often reduced.</p>	
1.4	Archaeology	<p>5549, 5496, 603883, 234690, 21.35ha</p> <p><i>“No anomalies of clear archaeological potential have been identified in PA 5496, immediately north and east of the</i></p>	<p>It needs to be made clear throughout the report what the limitations of magnetometry are, particularly within the river valleys. Broad statements “No anomalies of clear archaeological potential have been identified” need to be caveated with the limitations of the survey technique within the environmental context and that deep</p>	

		<p><i>River Stour (Illus 398). These Priority Areas lay within the floodplain of the river which is reflected in the survey data recording former channels and amorphous spreads of discrete anomalies likely resulting from alluvial deposition.”</i></p>	<p>deposits within the river valleys can mask the magnetic signals of archaeological features.</p> <p>Additionally, magnetometer survey cannot reliably determine the presence of archaeologically sensitive deposits (for example undisturbed peat, waterlogged organics, or buried soils); it only detects contrasts in magnetic properties, so depth, thick alluvium/colluvium, waterlogging and local geology can mask or eliminate detectable anomalies. For river valleys such as the Waveney, Gipping and Stour this limitation should be stated clearly in the report.</p> <p>Therefore, SCCAS recommend the interpretation section of the report is reassessed to incorporate the limitations of the survey technique in areas, particularly the river valleys.</p>	
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Table 2: 6.11.A5 (B) Environmental Statement Appendix 11.5 – Trial Trenching Results Report [AS-078]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
2.1	Archaeology	Site 5 – Area 12	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.2	Archaeology	Site 6 – RG Satellite Compound 2 and associated work, Stowupland, Suffolk	<p>Trenches with archaeology: 4 trenches contained features.</p> <p>Phases: single medieval fire pit; post-medieval boundary ditches visible on historic maps (from c.1884 into the 20th century).</p> <p>Research value: limited</p> <p>Recommendation: SCCAS will discuss mitigation with the applicant.</p>	
2.3	Archaeology	Site 7 – Bamford Substation Compound	<p>Trenches: 48 excavated; 24 contained archaeology.</p> <p>Periods represented: Late Bronze Age, Early/Late Iron Age, 12th–14th century medieval, post-medieval.</p> <p>Highlights: medieval enclosures concentrated north; prehistoric pits in the south with pottery; evidence of domestic activity (CBM, animal bone, cereal remains) but few structural remains.</p> <p>Recommendations: targeted specialist work on metalwork, pottery and CBM, worked bone.</p> <p>SCCAS will discuss mitigation with the Applicant, which will likely comprise targeted excavation of medieval enclosures and southern prehistoric activity.</p>	

2.4	Archaeology	Site 8 – Area 15C	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.5	Archaeology	Site 8 – Area 15N	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.6	Archaeology	Site 8 – Area 16	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.7	Archaeology	Site 8 – Area 17	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.8	Archaeology	Site 8 – Area 18	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.9	Archaeology	Site 8 – Area 22	This is an interim report, SCCAS will comment on full report when that is submitted.	
2.10	Archaeology	Site 8 – Area 22N	This is an interim report, SCCAS will comment on full report when that is submitted.	

Comments on submissions received at Deadline 1

Table 3: 8.1 (A) Errata List [REP1-071]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
3.1	Errata	<p>Table 1.1 (6.3.A6 [APP-236]) Environmental Statement Appendix 13.6: Arboricultural Impact Assessment</p> <p><i>“Incorrect version uploaded in error with application”</i></p> <p><i>“Figure A13.6.1: Arboricultural Impact Plan within Appendix 13.6 - Arboricultural Impact Assessment [APP-236] has been updated and is replaced by Figure A13.6.1: Arboricultural Impact Plan (Rev B) within Appendix A of this Errata.”</i></p>	<p>No further information, as to what the differences are, is given. This would have been helpful for reviewers. SCC considers that the Applicant should clearly list what the changes between the versions are and on which sheets of the figure they can be found.</p> <p>It is further not helpful, that while the figure has been re-issued the text of the AIA is only provided within [APP-236]. This means the document cannot be marked as ‘superseded by’.</p> <p>The Applicant need to further clarify whether Document: 7.4 Outline Landscape and Ecological Management Plan Appendix A - Arboricultural Impacts Plan [APP-322] is in accordance with Revision A [APP-236] or Revision B [REP1-065]. If it is in accordance with Revision A, SCC considers an updated for this Appendix should be provided at the next deadline.</p> <p>SCC would consider it helpful if the Case Team were to update the Examination Library to include a note at [APP-236] to say that Figure A13.6.1 is superseded by [REP1-065].</p>	<p>[APP-236] [REP1-071]</p>
3.2	Errata	<p>Table 1.1 (6.13.F7) Environmental Statement Figure 13.7: Visual Receptors and Viewpoints</p>	<p>SCC would welcome, if the Applicant was to confirm that this was the only change between the two versions. Alternatively, if other additional changes have been made, SCC considers that the</p>	<p>[APP-243] [REP1-071]</p>

		<p><i>“Incorrect revision uploaded in error with application - long distance footpaths were not included on the Figure.”</i></p> <p><i>“Figure 13.7: Visual Receptors and Viewpoints [APP-243] has been updated and is replaced by Figure 13.7: Visual Receptors and Viewpoints (Rev B) in Appendix A of this Errata.”</i></p>	<p>Applicant should clearly list what they are and on which sheets of the figure they can be found.</p> <p>No explanation is given as to the changes that have been made in Revision B versus Revision A [APP-243]. A page at the beginning of the document, that identifies the changes made, would have been helpful for any reviewer of the documents.</p> <p>SCC would consider it helpful if the Case Team were to update the Examination Library to include a note at [APP-243] to say that Figure 13.7 is superseded by [REP1-066].</p>	
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Table 4: 8.2 (A) Drainage Strategy Report [REP1-072]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
4.1	Flood and Water Environment	General	<p>SCC (Flood and Water) has met with the other lead local flood authorities (“LLFAs”) affected by this project and have agreed to take the same position with regard to our response to the Drainage Strategy. The other LLFAs are Norfolk County Council, Essex County Council and Thurrock Council.</p> <p>This document is 240 pages long and deals with inherently technical matters. Normally, the LLFAs would expect a drainage strategy to have been included as part of the application materials. In many cases, the Councils make agreements with applicants to get early sight of key technical documents before acceptance, so that there is sufficient time for these to inform our Relevant Representations and Local Impact Reports (“LIR”).</p> <p>If this document had been published with the rest of the documentation on the acceptance date, our engineers would have had 11 weeks to review the drainage strategy before the Relevant Representations were due and nearly 22 weeks before the LIRs were due. Because the drainage strategy was only submitted at Deadline 1, the LLFAs have only had it for two weeks.</p> <p>This is insufficient time to provide a comprehensive technical review of the drainage strategy. The LLFAs recommend that the Examining Authority (“ExA”) should take the opportunity of the ExA’s first written questions to ask the LLFAs for their detailed technical view on the drainage strategy. In particular, the ExA may wish to ask the LLFAs how the drainage strategy should be secured in the draft development consent order, and what changes to the drainage strategy would be necessary to make it suitable for use as an outline drainage strategy.</p>	

			<p>What the LLFAs can say at this point is that the drainage strategy will require further work before it can be used as a basis for detailed design at a later stage. At a minimum, the following information will be required in the Drainage Strategy:</p> <ol style="list-style-type: none"> 1. Drainage Layout Drawings <p>Separate drainage layout drawings should be provided for both temporary works areas and permanent development sites. These should clearly identify the location, type and function of all proposed Sustainable Drainage Systems (SuDS) features and demonstrate the overall surface water management strategy.</p> <ol style="list-style-type: none"> 2. Hydraulic Calculations <p>Detailed hydraulic calculations should be provided to demonstrate that adequate attenuation capacity is available within the site to manage runoff for a range of rainfall events, including the 1 in 100-year storm event with a 40% climate change allowance.</p> <ol style="list-style-type: none"> 3. Overland Flow Modelling <p>Surface water modelling should be undertaken to demonstrate how existing and proposed overland flow paths will be managed. The modelling should confirm that flows can be safely intercepted and conveyed without increasing flood risk within the site, the surrounding area, or the upstream catchment.</p> <ol style="list-style-type: none"> 4. Interaction with the Lower Thames Crossing Scheme <p>The drainage strategy should consider and demonstrate any potential interactions or cross-implications between the proposed drainage arrangements and the infrastructure associated with the Lower Thames Crossing across the relevant catchments.</p>	
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			<p>5. Surface Water Flood Risk Mapping</p> <p>Plans should be provided showing an overlay of the Environment Agency’s Risk of Flooding from Surface Water mapping across all temporary and permanent works areas, demonstrating how the proposed layout has taken account of areas potentially susceptible to surface water flooding.</p> <p>6. Water Quality – High Pollutant Risk Sites</p> <p>For sites identified as having high pollutant loading, a Water Quality Risk Assessment should be submitted in accordance with Environment Agency requirements to demonstrate that surface water discharges to a watercourse or river will not adversely affect the receiving environment.</p> <p>7. Water Quality – Medium to Low Pollutant Risk Sites</p> <p>For sites with medium to low pollutant risk, a Simple Index Approach (SIA) assessment should be undertaken in accordance with the CIRIA SuDS Manual C753 to demonstrate that appropriate levels of treatment are provided.</p> <p>8. Water Quality Monitoring</p> <p>Details of water quality monitoring arrangements should be provided for both the construction and operational phases, setting out how potential pollution risks will be managed and monitored throughout the lifecycle of the development.</p> <p>9. Groundwater Monitoring</p> <p>In areas identified as susceptible to groundwater flooding, groundwater monitoring data and supporting assessment should be provided to demonstrate that groundwater conditions have been appropriately considered in the drainage design.</p>	
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Table 5: 8.4.1 (A) Applicant’s Comments on Relevant Representations [REP1-132]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
5.1	Third Party Interactions (Other Developers)	<p>Table 2.1 (Comments about cumulative impacts with developments that connect to the Project (e.g Tarchon Interconnector, North Falls Wind Farm))</p> <p><i>“[...] Project teams have worked collaboratively to reduce potential cumulative traffic effects should they be undertaken in parallel. A full list of cumulative developments considered are detailed within the long list of other developments (6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283]). The cumulative effects assessment also follows Planning Inspectorate’s Advice Note 17 ‘Cumulative Effects Assessment’.”</i></p>	<p>SCC (Highways) would be interested is seeing what modelling has been undertaken to assess the cumulative impacts and what the measures are to reduce this combined impact.</p>	
5.2	Third Party Interactions (Other Developers)	<p>Table 2.1 (Comments about the construction traffic and activities of the Project causing vibrations to nearby buildings)</p> <p><i>“An assessment of construction vibration is presented in 6.14 Environmental Statement Chapter 14 - Noise and Vibration [APP-256]. The assessment considers both the potential</i></p>	<p>SCC (Highways) asserts that consideration should also be given to sensitive structures such as listed buildings close to the major access routes, for example A140 Brockford Street.</p>	

		<p><i>impact upon people within buildings (i.e. disturbance), and potential damage to buildings and structures. The assessment considers relatively worst-case construction methodologies and does not take account of potential mitigation [...]</i>”</p>		
5.3	Third Party Interactions (Other Developers)	<p>Table 2.1 (Comments about road closures resulting from the construction of the Project)</p> <p><i>“7.3 Outline Construction Traffic Management Plan [APP-309] manages the impacts arising from temporary road closures that are required, including the provision of diversion routes where appropriate. The long-term road closure Wymondham Road in Norfolk is to be closed for longer than 18 months and the assessment of the impact of this closure is detailed in 7.11 Transport Assessment [APP-333]. Additionally, short term road closures associated with overhead line stringing, construction of highway mitigation works, construction of bellmouth junctions and the open-cut cable swathe are expected on some of the roads, as detailed in Section 5.8.10 of 7.3 Outline Construction Traffic Management Plan [APP-309]. It is anticipated that the coordination/planning of road closures will be</i></p>	<p>SCC (Highways) comments also relate to the disruptive nature of traffic using diversion routes for local communities and the delays, safety issues for road users.</p>	

		<p><i>secured through Local Highway Authority Permit Schemes, to minimise disruption and ensure conflicting road closures are not proposed concurrently. Schedule 7 and Schedule 8 of 3.1 Draft Development Consent Order [APP-056] provide locations of the Streets and PRowS to be temporarily closed and Permanently Stopped Up and details of the proposed diversion routes.”</i></p>		
5.4	Highways	<p>Table T (Article 14: Power to alter layout, etc. of streets)</p> <p><i>“National Highways’ position is noted. This is a matter that could be dealt with in the Protective Provisions. The Applicant is committed to ongoing engagement with National Highways to seek agreement of the draft Protective Provisions in favour of National Highways.”</i></p>	<p><i>“The applicant has the power without the consent of the street authority to permanently or temporarily alter the layout and carry out works to the streets specified in column (1) of Part 1 (streets subject to permanent alteration of layout) or 2 (streets subject to temporary alteration of layout) of Schedule 6. This also includes streets whether or not within the Order limits. This power is far too wide and vague to be acceptable to NH.”</i></p> <p>SCC (Highways) concurs with view that the powers are in excess of what is needed as a statutory undertaker and may result in LHA having to rectify the highway if it is changed to an unsafe layout or additional maintenance is required following changes.</p>	
5.5	Historic Environment	<p>Table AB (11-12)</p>	<p>SCCAS acknowledges the substantial scale of the Applicant’s fieldwork to date, the Norwich to Tilbury National Infrastructure Project is a c.180km linear</p>	<p>[APP-214]</p> <p>[APP-328]</p>

<p>- Archaeology</p>	<p><i>“The archaeological evaluation work (geophysics and trial trenching) is ongoing, continuing the Applicant’s commitment to the historic environment potentially affected the Project. The results of the fieldwork up to the end of December 2025 were submitted to the Planning Inspectorate in January 2026 as Supplementary Environmental Information which Suffolk County Council is aware of. At this stage approximately 3,000 trial trenches and 1,440 ha of geophysical survey have been completed. The Phase 2 stage of the geophysical survey and trial trenching will continue in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. The vast majority of the priority geophysical survey and trial trenching are complete and included in the Supplementary Environmental Information Report. Geoarchaeological monitoring of ground investigation works at three locations with high potential for geoarchaeological remains and potential impact from the Project took place prior to submission and the results of this work, including deposit models, are</i></p>	<p>scheme crossing Norfolk, Suffolk and Essex, which will require archaeological evaluation (geophysical survey and trial trenching) of development impact areas to inform a programme of archaeological mitigation and to allow development to commence in evaluated areas where no archaeology is present.</p> <p>But SCCAS reiterates that the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] remains unapproved, and until an approved version is secured the post-consent framework for evaluation and mitigation is not in place. SCCAS have provided detailed comments on the submitted 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in Annex A of the Joint Local Impact Report [REP1-178].</p> <p>Accordingly, SCCAS requires the Applicant to submit an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in reasonable time during the examination, incorporating LPA archaeological advisor comments. The document must be approved by the Local Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England. If approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be achieved by the time of determination, the DCO must include provision for post-consent</p>	<p>[REP1-178]</p>
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		<p><i>included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. The Applicant will update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England. The update and scope of the document will be informed by the findings of the ongoing fieldwork, and the document will identify areas of Phase 2 evaluation and areas where mitigation will be required. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their DCO application. The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.”</i></p>	<p>approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> <p>SCCAS request that the Applicant provide a timetable for when the amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] will be submitted for review.</p> <p>SCCAS will be having discussions with the Applicant in the week commencing 23rd March 2026, where we will be discussing the methodology for Non-Priority Area trial trenching and initial discussions for archaeological mitigation within the priority areas. Initial discussions on the Applicants proposed scope for trial trenching of the Non-Priority Areas has raised concerns for SCCAS, where the Applicant proposes to only trial trenching areas where geophysical survey has identified geophysical anomalies. However, the magnetometer survey used by the project for the purpose of archaeological prospection will only detect anomalies with a sufficient magnetic contrast to the background geology, where factors such as depth of overburden/deposits and size of archaeological features etc can have an impact on their detection in the survey data. Therefore, SCCAS request that in the absence of an approved OAMS-OWSI, the Applicant provides written confirmation that a programme of post-determination evaluation, will be carried out across all development impact</p>	
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			<p>areas, including ground-truthing of geophysical results and trial trenching of both geophysical anomalies and “blank” areas to enable the development of a programme of archaeological mitigation for the development impacts.</p> <p>The Applicant refers to document 6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214], which identified deposits with potential archaeological and palaeoenvironmental value, notably peats and organic silts (which may preserve significant archaeological and palaeoenvironmental evidence). However, the scope of the monitoring did not include palaeoenvironmental assessment or scientific dating, and consequently, the chronology, preservation conditions, and significance of these deposits remain undetermined.</p> <p>Accordingly, this document constitutes a preliminary assessment only and should not be considered as a substitute for the full geoarchaeological and palaeoenvironmental assessment that will be required to inform project design decisions and mitigation.</p> <p>SCCAS therefore recommends a programme of post-consent geoarchaeological assessment including transects of boreholes, within the river valleys to</p>	
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			<p>refine the deposit models produced in 6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214], and to inform a programme of coring, to retrieve sleeved collum samples, for palaeoenvironmental sampling and scientific dating (e.g. radiocarbon, OSL where appropriate). The results should be used to assess the survival and significance of deposits, to inform an appropriate mitigation strategies and to feed directly into project design. This programme must be secured by enforceable Requirement wording and scheduled early in the project timetable so that results can inform design decisions and mitigation.</p>	
5.6	<p>Historic Environment - Archaeology</p>	<p>Tale AB (15) <i>“See response to items 11 and 12 above. Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for evaluation. The post-consent process and techniques in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] includes evaluation and this document is secured through Requirement 5.”</i></p>	<p>The 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is unapproved, therefore the post-consent methodology for archaeological evaluation is not secured. SCCAS have provided detailed comments on the submitted 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in Annex A of the Joint Local Impact Report [REP1-178].</p> <p>SCCAS reiterate that the Applicant must submit an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in reasonable time during the examination, incorporating LPA archaeological advisor comments.</p>	<p>[APP-328] [REP1-178]</p>

			<p>Allowing sufficient time for the LPA archaeological advisors and Historic England to comment on the document. The document must be approved by the Local Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England.</p> <p>If approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be achieved by the time of determination, the DCO must include provision for post-consent approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>	
5.7	<p>Historic Environment - Archaeology</p>	<p>Table AB (16–17)</p> <p><i>“Since the submission of the DCO application, archaeological fieldwork comprising geophysical survey and archaeological trial trenching has been ongoing. As described in the Supplementary Environmental Information submitted to the Planning Inspectorate in January 2026, this fieldwork has resulted in the identification of 54 additional non-designated assets within the bounds of the Order Limits across the Project. In Suffolk these assets comprise: three medium value and five low value assets identified in Section B; and five medium value and 16 low value assets identified in Section C. The assessment</i></p>	<p>We are not arguing that the potential for archaeology of high significance should prevent the development from being granted. Archaeological mitigation must, however, be secured irrespective of the assessed significance of individual heritage assets. Mitigation comprises the preservation by record of archaeological remains that will be damaged or destroyed by the development and is a necessary measure to manage risk across the Order Limits.</p> <p>The results of the evaluation to date are indicative rather than definitive. Geophysical survey and trial trenching provide important information about the presence/absence, distribution, character and provide a provisional assessment of the archaeological significance features and deposits.</p>	[APP-328]

		<p><i>considered the physical impact of the Project on the archaeological remains of all the assets and also the impact on the settings of the medium value assets. The assessment concluded that the Project would result in negligible/minor significance of effects (not significant) on the identified assets. As set out above the Phase 2 stage of the geophysical survey and trial trenching will continue in 2026, and all the results of this work will be shared with the Local Planning Authority Archaeological Advisors for approval as discussed at monthly meetings and set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</i></p> <p><i>17 – The approach set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] already includes provision for further evaluation and a range of mitigation strategies, including preservation in situ, should highly significant remains be identified.”</i></p>	<p>But the results to date cannot fully determine significance until full excavation and recording have been undertaken. Any significance assessments based on evaluation trenches therefore remain provisional and should not be treated as conclusive about the scale or importance of surviving archaeology.</p> <p>The evaluation undertaken to date demonstrates a high likelihood that further unrecorded archaeological heritage assets remain within the areas that have been evaluated and those areas not yet evaluated.</p> <p>The discovery of these assets does not demonstrate that impacts will be negligible, on the contrary, it confirms that the archaeological landscape is more complex than previously understood and that impacts could be greater once the full extent and significance of deposits are established.</p> <p>SCCAS therefore maintains that post-consent archaeological evaluation for all remaining areas of project impact must be secured through approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and by enforceable requirement wording in the DCO.</p> <p>Should the application be granted permission, the full post-consent evaluation of development impacts must be undertaken at the earliest opportunity and completed before any irreversible groundworks</p>	
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			commence in the affected areas so that appropriate mitigation can be developed and integrated into construction programmes and timetables.	
5.8	Historic Environment - Archaeology	<p>Table AB (18)</p> <p><i>“Geoarchaeological monitoring of ground investigation works at three locations with high potential for geoarchaeological remains and potential impact from the Project took place prior to submission and the results of this work, including deposit models, are included in 6.11.A6 Environmental Statement Appendix 11.6 - Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214]. Provision for further geoarchaeological work is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated in consultation with Local Planning Authority Archaeological Advisors to consider any detailed comments provided in Local Impact Reports.”</i></p>	<p>The Applicant refers to document 6.11.A6 Environmental Statement Appendix 11.6 – Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214], which identified deposits with potential archaeological and palaeoenvironmental value, notably peats and organic silts (which may preserve significant archaeological and palaeoenvironmental evidence). However, the scope of the monitoring did not include palaeoenvironmental assessment or scientific dating, and consequently, the chronology, preservation conditions, and significance of these deposits remain undetermined.</p> <p>Accordingly, this document constitutes a preliminary assessment only and should not be considered as a substitute for the full geoarchaeological and palaeoenvironmental assessment that will be required to inform project design decisions and mitigation.</p> <p>SCCAS therefore recommends a programme of post-consent geoarchaeological assessment including transects of boreholes, within the river valleys to refine the deposit models produced in 6.11.A6 Environmental Statement Appendix 11.6 –</p>	[APP-214]

			<p>Geoarchaeological Monitoring of Ground Investigation Works Report [APP-214], and to inform a programme of coring, to retrieve sleeved collum samples, for palaeoenvironmental sampling and scientific dating (e.g. radiocarbon, OSL where appropriate). The results should be used to assess the survival and significance of deposits, to inform an appropriate mitigation strategies and to feed directly into project design. This programme must be secured by enforceable Requirement wording and scheduled early in the project timetable so that results can inform design decisions and mitigation.</p>	
5.9	<p>Historic Environment - Archaeology</p>	<p>Table AB (19) <i>“The framework for production of Detailed WSIs is included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].”</i></p>	<p>The 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is unapproved, therefore the post-consent methodology for archaeological evaluation is not secured. SCCAS have provided detailed comments on the submitted 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in Annex A of the Joint Local Impact Report [REP1-178].</p> <p>SCCAS reiterate that the Applicant must submit an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in reasonable time during the examination, incorporating LPA archaeological advisor comments. Allowing sufficient time for the LPA archaeological advisors and Historic England to comment on the</p>	<p>[APP-328] [REP1-178]</p>

			<p>document. The document must be approved by the Local Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England.</p> <p>If approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be achieved by the time of determination, the DCO must include provision for post-consent approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>	
5.10	Historic Environment - Archaeology	<p>Table AB (20)</p> <p><i>“Comments on the draft version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] provided by the Council’s archaeological advisors were considered in the updated version submitted with the DCO application. As discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England, comments on the current version will be considered in an updated version to be submitted during examination. However, the fieldwork undertaken to date comprises a more comprehensive approach to evaluation than most other Nationally Significant Infrastructure Projects have completed by the time of their</i></p>	<p>The 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] is unapproved, therefore the post-consent methodology for archaeological evaluation is not secured. SCCAS have provided detailed comments on the submitted 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in Annex A of the Joint Local Impact Report [REP1-178].</p> <p>SCCAS reiterate that the Applicant must submit an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in reasonable time during the examination, incorporating LPA archaeological advisor comments. Allowing sufficient time for the LPA archaeological advisors and Historic England to comment on the document. The document must be approved by the</p>	<p>[APP-328]</p> <p>[REP1-178]</p>

		<p><i>DCO application and which have been considered sufficient by the Planning Inspectorate and the Secretary of State to determine applications”</i></p>	<p>Local Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England.</p> <p>If approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be achieved by the time of determination, the DCO must include provision for post-consent approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p> <p>The applicant also argues that the level of fieldwork undertaken exceeds that of many other NSIPs at DCO submission stage. While SCCAS recognises the volume of evaluation undertaken, the Norwich to Tilbury National Infrastructure Project is a c.180km linear scheme which crosses Norfolk, Suffolk and Essex, which will require evaluation of the development impacts to inform a programme of archaeological mitigation and to allow development to commence in evaluated areas with no archaeology.</p> <p>Recent NSIP projects in Suffolk demonstrate the scale of trial trenching undertaken prior to determination: Sizewell C completed trial trenching across approximately 80 – 90% (2204 no. trenches) with all remaining or additional areas secured post-DCO. Other NSIPs currently pre-DCO such as SeaLink and Lion Link are each trial trenching around 90% of their impact areas prior to determination.</p>	
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<p>5.11</p>	<p>Historic Environment - Archaeology</p>	<p>Table AB (21)</p> <p><i>“Requirement 5 within 3.1 Draft Development Consent Order [APP-056] already includes provision for evaluation. The post-consent process and techniques in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] includes evaluation and this document is secured through Requirement 5. Comments will be considered as part of the updates to 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328], which will be updated during the examination period in consultation with the Local Planning Authority Archaeological Advisors, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England.”</i></p>	<p>SCCAS acknowledges that Requirement 5 and the revised 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation (AMS-OWSI) [APP-328] include methodologies for further assessment and mitigation.</p> <p>However, while the submitted AMS-OWSI now sets out a range of techniques, the proposed approaches remain inadequate to ensure that the full archaeological implications of the Project are identified and appropriately mitigated before development works commence.</p>	<p>[APP-328]</p>
<p>5.12</p>	<p>Historic Environment - Archaeology</p>	<p>Table AB (22)</p> <p>“Any archaeological remains preserved in situ that remain in the Applicant’s ownership will have a management plan prepared, which will be included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and</p>	<p>The Applicant’s comment is noted. However, where archaeological remains are to be preserved in situ that are outside the Applicant’s ownership, the Applicant shall record and map their locations, notify the landowner and prepare and implement a written management plan that includes consultation triggers for any project related future intrusive works with in these areas (such as maintenance, enhancement), the management plans must defined roles and</p>	<p>[APP-056] [APP-328]</p>

		secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056]. ”	responsibilities, monitoring and reporting, and any necessary protective measures. These provisions shall be included in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] and secured through Requirement 5 of the Draft Development Consent Order [APP-056] .	
5.13	Historic Environment - Archaeology	<p>Table AB (23)</p> <p><i>“Regarding archaeology, geoarchaeology, and palaeoenvironmental matters to secure evaluation, mitigation, reporting, publication, and archiving these aspects are set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328]. While these matters are already covered in this document the Applicant proposes to update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during examination in response to further comments from the Council, as discussed and agreed at regular monthly meetings with the Local Planning Authorities and Historic England. Detailed comments on the current version are understood to be included in the Council’s LIR. As 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of</i></p>	<p>SCCAS strongly disagrees that the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] alone can secure post-excavation analysis, reporting and archiving. The OAMS-OWSI can set out the requirement for post-excavation assessment work, but it cannot detail the delivery for full analysis of the archaeological resource because the precise scope of post-excavation requirements can only be determined after fieldwork and post-excavation assessment has been completed.</p> <p>The post-excavation assessment reports will determine which specialist analyses, conservation measures, number of archive boxes required, and level of publication are required. This cannot be fully specified in advance of the fieldwork being completed.</p> <p>Relying solely on the OAMS-OWSI risks underestimating the quantity of archaeological material and information leading to underfunding,</p>	<p>[APP-328]</p> <p>[REP1-178]</p>

		<p><i>Investigation [APP-328] is secured through Requirement 5 within 3.1 Draft Development Consent Order [APP-056] there should be no need to significantly alter Requirement 5.”</i></p>	<p>delays or omission of essential post-excavation stages, publication and deposition of archives. Which negates the purpose of archaeological mitigation by record.</p> <p>SCCAS have advised that there must be additional DCO requirements to secure an Updated Project Design (UPD) informed by Post-Excavation Analysis Reports. The UPD should set out detailed analyses, a timetable for completion and publication, repository acceptance for physical and digital archives, and confirmed funding to deliver all stages. This position aligns with Historic England’s MoRPHE (2015).</p> <p>Requirement 5 as currently drafted does not ensure these outcomes and must be strengthened. SCCAS seeks clear triggers and timescales for submission of Post-Excavation Analysis Reports and the UPD, proof of secured funding and repository deposition agreements following completion of the post-excavation assessment stage, and to ensure timely publication and long-term preservation of the archaeological record generated by this project.</p> <p>The additional requirement as suggested is not onerous and will enable the discharging authority to track and ensure compliance. Similar DCO requirements have been accepted by examiners and attached to consent for other large infrastructure projects in Suffolk, please see detailed comments on</p>	
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			DCO requirement wording in Chapter 14 of the Joint Local Impact Report [REP1-178] .	
5.14	Historic Environment - Archaeology	<p>Table AB (24-25)</p> <p><i>“The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas and Phase 2 geophysical survey (6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]). The Applicant proposes to update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation.”</i></p>	<p>SCCAS notes this comment in relation to submitted figure 6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [AS-082]</p>	[AS-082]
5.15	Historic Environment - Archaeology	<p>Table AB (26)</p> <p><i>“The Supplementary Environmental Information includes a Project-wide figure indicating the progress of the priority evaluation areas and Phase 2 geophysical survey (6.11.F4 Environmental Statement Figure 11.4 - Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching</i></p>	<p>SCCAS reiterate that the Applicant must submit an amended 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] in reasonable time during the examination, incorporating LPA archaeological advisor comments. Allowing sufficient time for the LPA archaeological advisors and Historic England to comment on the document. The document must be approved by the</p>	[APP-328]

		<p><i>Priority Areas [AS-082]). The Applicant proposes to update 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination phase in consultation with the Local Planning Authority Archaeological Advisors, which will include figures detailing the completed and planned evaluation.”</i></p>	<p>Local Authority Archaeological Advisors (Norfolk, Essex and Suffolk) and Historic England.</p> <p>If approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] cannot be achieved by the time of determination, the DCO must include provision for post-consent approval of the 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328].</p>	
5.16	<p>Historic Environment - Archaeology</p>	<p>Table AB (27)</p> <p><i>“Updates relating to this are proposed to be included in the update to 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [APP-328] during the examination period in consultation with the Local Planning Authority Archaeological Advisors.”</i></p>	<p>See comment in Table Item 5.15 (above).</p>	
5.17	<p>Historic Environment - Archaeology</p>	<p>Table AB (28)</p> <p><i>“7.2 Outline Code of Construction Practice [APP-300] includes commitments for mitigation of impacts to the historic environment. The Applicant is not intending to produce an OREAC or OCEMP as the typical content of these documents is already</i></p>	<p>Please see SCCAS comments In Annex A of the Joint Local Impact Report [REP1-178] on document 7.2 Outline Code of Construction Practice [APP-300] and 7.2 Outline Code of Construction Practice Appendix C – Outline Soil Resource Plan [APP-303]</p>	<p>[APP-300] [APP-303] [REP1-178]</p>

		<i>included within 7.2 Outline Code of Construction Practice [APP-300].”</i>		
5.18	Ecology and Biodiversity	<p>Table AB (31)</p> <p><i>“Survey results from 2025 (including habitat, otter, water vole and bat roost inspections) are presented within the updated 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] which was submitted to the Planning Inspectorate in November 2025. Conclusions in the assessment have not changed as a result of the 2025 surveys undertaken.”</i></p>	<p>SCC (Ecology) welcomes the updated survey information presented in November 2025 and are content with the conclusions that the assessments do not require changing from those presented in the ES. It is noted that 3% of the route (3miles+) remains unsurveyed and subject to assessments via indirect data sources and scientific assumption. Whilst this approach to the assessment of these areas is broadly acceptable, it is essential that any works undertaken that could have potential impacts upon ecological receptors, within the unsurveyed sections, be first visited and assessed by the ECoW: including within the pre-commencement works. The results of any such surveys and assessments would need to be suitably mitigated in accordance with the CoCP and LEMP.</p>	
5.19	Ecology and Biodiversity	<p>Table AB (35)</p> <p><i>“The Applicant can confirm that the final version of the Landscape and Ecological Management Plan (LEMP) and Code of Construction Practice (CoCP) will be submitted for approval to the relevant Local Planning Authorities, in accordance with Requirement 4 of the 3.1 Draft Development</i></p>	<p>SCC (Ecology) would expect to see all versions of both the LEMP and CoCP when completed, upto and including the final versions, in order to provide comment and monitor reactions and adaptations to the comments of consultees.</p>	

		Consent Order [APP-056] , prior to commencement of works.”		
5.20	Ecology and Biodiversity	<p>Table AB (36)</p> <p>“7.4 Outline Landscape and Ecological Management Plan [AS-046] outlines the approach to reinstatement planting. The Applicant has committed to a 3:1 replacement for individual trees and individual trees within small groups. All other tree habitat including scrub and woodland (area habitats) is assessed and mitigated through the BNG metric and captured within 7.1 Biodiversity Net Gain Report [APP-299].”</p>	SCC (Ecology) welcomes the commitment to the 3:1 replacement of trees alongside the BNG calculations.	
5.21	Ecology and Biodiversity	<p>Table AB (37)</p> <p>“7.4 Outline Landscape and Ecological Management Plan [AS-046] outlines the approach to reinstatement planting for hedgerows, including important hedgerows. Hedgerows will be re-planted in the same location from which they were removed. The only exception to this will be at the permanent substation and Cable Sealing End compound sites, within the Environmental Areas, where an illustrative landscaping plan for each location has been prepared within 7.4 Outline Landscape and Ecological Management Plan Appendix C - Planting Schedules [APP-324]. All</p>	SCC (Ecology) notes the extent and location commitments provided by the applicant. The reinstatement of hedgerows facing “temporary impacts” will need to be monitored closely and thoroughly to ensure the reinstatement is entirely successful to at least as high a value as prior to the impacts. It is considered that a 10-year monitoring period would provide a greater insurance of success rather than a 5-year monitoring period. In fact, for species-rich hedgerows in good condition (an achievable and ambitious target for hedgerow creation within Suffolk), the BNG stated time to achieve final condition is 12 years and therefore a 10 year monitoring programme (which may only require 2 additional monitoring visits in e.g. year 7 and year 10)	

		<p><i>hedgerows temporarily impacted by the Project will be reinstated at the earliest appropriate opportunity within the correct planting season, allowing connectivity to be maintained.”</i></p>	<p>seems a more considered and valuable approach, likely to increase the chances of successful reinstatement in the long term.</p>	
5.22	Ecology and Biodiversity	<p>Table AB (38)</p> <p><i>“The only irreplaceable habitats identified across the Order Limits are ancient woodland and veteran trees. While every effort has been made to avoid ancient woodland through careful routeing and siting there are five ancient woodlands where direct/indirect impacts are unavoidable, as the proposed works relate to the removal, undergrounding or modification of existing third-party infrastructure (11 kV, 33 kV, 132 kV), with the existing assets already located within the associated woodland or 15 m root protection zone. However, these impacts have been minimised and appropriate mitigation set out in detail within 7.4 Outline Landscape and Ecological Management Plan Appendix B - Ancient Woodland and Veteran Tree Strategy [APP-323]. This document sets out clear mitigation measures required at each of the five ancient woodlands to ensure no significant longterm residual effect and to ensure compliance with the Overarching National</i></p>	<p>SCC (Ecology) would like the language regarding retention of veteran trees be significantly more direct and ambitious (i.e. rather than “with effort made to retain the trees” it would be preferred that the language was more akin to; the tree will be retained unless every reasonable alternative to removal has been fully explored and completely exhausted).</p>	

		<p><i>Policy Statement for Energy (EN-1 (2024)). The Project currently reports the loss of four veteran trees, however this would be reviewed during detailed design with effort made to retain the trees. Commitment GG14 in 7.2 Outline Code of Construction Practice [APP-300] confirms that relevant surveys for arboriculture would be undertaken to reduce the impact of the Project on trees and hedgerows (this includes the veteran trees)."</i></p>		
5.23	Ecology and Biodiversity	<p>Table AB (39) <i>"Under the Wildlife and Countryside Act 1981 (as amended) it is an offence to plant or otherwise cause to grow in the wild any plant listed under Schedule 9. Measures to ensure invasive species under Scheule 9 are not spread as a result of the Project are outlined within 7.4 Outline Landscape and Ecological Management Plan [AS-046] which would ensure compliance with this legislation."</i></p>	<p>SCC (Ecology) asserts that the previous comment in the Relevant Representation was a request for ecological enhancement through eradication of INNS if found within the Order Limits. This is not considered in the Applicant's response.</p> <p>In addition, details of how the unsurveyed 3% of the Order Limits will be subject to mitigation, if works are required within these areas which may result in an offence, for INNS requires clarification.</p>	
5.24	Ecology and Biodiversity	<p>Table AB (41) <i>The reference in Table 8.23 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] to habitat creation/enhancement associated with Biodiversity Net Gain (BNG) relates solely to the measures proposed to address permanent</i></p>	<p>Table 8.23 of 6.8 Environmental Statement Chapter 8 - Ecology and Biodiversity [AS-026] <i>"Mitigation for the permanent loss of habitat would be delivered through the creation/enhancement of habitat associated with achieving BNG for the Project."</i></p>	

		<p><i>habitat loss at the Project level. It is not relied upon as mitigation for breeding birds or wintering/passage birds. Mitigation for breeding/wintering birds is provided through established construction phase measures and habitat reinstatement, as set out in 7.4 Outline Landscape and Ecological Management Plan [AS-046]. These include seasonal timing of vegetation removal, pre-works nesting bird checks, exclusion zones around active nests, reinstatement of temporarily lost habitat, and measures to minimise disturbance. These measures operate independently of BNG and ensure that impacts on breeding and wintering/passage birds are avoided or reduced at source. BNG is intended to deliver a net gain in biodiversity value across the Project and is not required to achieve the residual impact conclusions for these bird receptors. The assessment of effects on breeding and wintering/passage birds does not depend on BNG to demonstrate that no significant residual effects remain. Accordingly, no separate mitigation area is required to address permanent habitat loss for breeding or wintering/passage birds, as the assessment concludes that such losses do not give rise to significant residual effects.</i></p>	<p>The above text appears contradictory to the last sentence of the applicant’s response. Please could the distinction be clarified.</p>	
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5.25	Ecology and Biodiversity	<p>Table AB (42)</p> <p><i>The Applicant’s commitment to ensure compliance with all ecological mitigation measures is detailed within 7.2 Outline Code of Construction Practice [APP-300] and 7.4 Outline Landscape and Ecological Management Plan [AS-046]. The final Code of Construction Practice and final Landscape and Ecological Management Plan would be completed post consent by the relevant Main Works Contractor(s) and would include additional details on the Ecological Clerk of Works. No Ecology Working Group is proposed for this Project.</i></p>	<p>SCC (Ecology) queries that given the complexity, extent, cross authority nature and potential impacts on significant habitats, sites, species and projects e.g. WaLOR, could the applicant please clarify their rationale, if they have one, for not raising and engaging with an Ecology Working Group? It is our experience, in previous and current NSIPs, that an Ecology Working Group is a highly useful and productive way for key parties, including: local authorities, the Applicant and NGO’s to identify and resolve issues as they rise through the lifetime of the project.</p> <p>The resources, extent, locations, manpower etc. of the ECoW will be crucial. It is expected that rather than a bare minimum, one size fits all, industry standard approach the role of ECoW is designed and implemented in a bespoke way, that is suitable for the specific requirements of this project.</p>	
5.26	Ecology and Biodiversity	<p>Table AB (44)</p> <p><i>“The Environment Act 2021 introduces a mandatory requirement for 10% Biodiversity Net Gain (BNG) for development (subject to certain exemptions); however this requirement is not yet in force for development consented pursuant to a Development Consent Order (DCO). Despite submitting the development consent application before it is mandatory, the Applicant has committed to deliver 10% BNG</i></p>	<p>SCC (Ecology) states that given the proposal to incorporate BNG management and monitoring information within the LEMP, SCC would like confirmation that the final version of the LEMP will be constructed in such a way as to include all detail, sections and information expected to be included within the most recent version of the Natural England/DEFRA HMMP template.</p>	

		<p><i>with wider environmental and societal benefits for the Project. The 10% BNG target for the Project is currently voluntary and aligned with the Applicant’s corporate sustainability commitment. In the absence of any guidelines for Nationally Significant Infrastructure Projects, the BNG assessment methodology was set out and agreed with Natural England and Local Planning Authorities. The details of the BNG methodology are presented within 7.1 Biodiversity Net Gain Report [APP-299]. The Applicant has committed to a 30-year monitoring and maintenance period at Environmental Areas in line with the commitments made within 7.1 Biodiversity Net Gain Report [APP-299]. The monitoring and maintenance measures for the Environmental Areas would be included in the final Landscape and Ecological Management Plan, which would be subject to review by the relevant Local Planning Authority ahead of works. For any required off-site BNG, the Applicant is committed to the delivery of units through third-party providers, with sites registered on the Natural England register to ensure reliable delivery. Long-term management of these off-site BNG habitats will fall to the third-party</i></p>		
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		<i>providers in line with the habitat management plan for the specific site.”</i>		
5.27	Ecology and Biodiversity	<p>Table AB (45)</p> <p><i>“As secured through 7.2 Outline Code of Construction Practice [APP-300] and 7.4 Outline Landscape and Ecological Management Plan [AS-046] all staff and operatives working on the Project would undergo a sitespecific induction, which would include relevant environmental topics. Environmental toolbox talks would be provided by the Main Works Contractor(s). These would give targeted information about site-specific issues or activities taking place at that time.”</i></p>	<p>SCC (Ecology) seek assurance that the toolbox talks are delivered by a suitably qualified and experienced ecological professional rather than non-specialist works contractor.</p>	
5.28	Ecology and Biodiversity	<p>Table AB (46)</p> <p><i>“The five-year monitoring period for tree and hedgerow replacement planting is considered sufficient to ensure successful establishment and is in line with other recent Nationally Significant Infrastructure Projects. The monitoring period is adaptive, as stated within 7.4 Outline Landscape and Ecological Management Plan [AS-046] which includes like-for-like replacement or consideration of alternative species based on site conditions and the reasons for failure. Requirement 9(7) (reinstatement planting plan) in Schedule 3 of</i></p>	<p>As mentioned previously and echoing the comments from numerous other consultees on this project, an extended period of monitoring would be preferable for this project. Being in line with other recent NSIPs does not necessarily make it adequate for this particular case.</p> <p>As mentioned earlier (in response to table item 37), for BNG hedgerows in good condition, a 12-year period is expected for them to reach good condition. For hedgerow plants and trees to have survived for 5 years, does not guarantee high quality establishment and failure may still occur, particularly given the</p>	

		<p>3.1 Draft Development Consent Order [APP-056] secures the replacement of any trees or hedgerows planted as part of an approved reinstatement planting plan that, within a period of five years after planting, are removed, die or become seriously damaged or diseased.”</p>	<p>increased variation and frequency of extreme weather events (flooding, drought, high temperatures etc.).</p> <p>A 10-year monitoring period, even with only 2 further monitoring visits than proposed, would enable greater potential to identify and remedy failure within the establishment phase and also modify management, to ensure the best possible condition for the habitat can be achieved, rather than the bare minimum.</p>	
5.29	Socio-economics Recreation and Tourism	<p>Table AB (48)</p> <p>The Applicant has rejected the request of SCC to provide granular modelling of the construction workforce by project phase as required by SCC’s Supplementary Guidance.</p> <p><i>“The ES assessment on employment impacts is in line with the Overarching National Policy Statement for Energy (EN-1). The Applicant is committed to sharing relevant detailed labour market demand data once it is available.”</i></p>	<p>SCC (Skills) does not agree that the ES meets the requirements of EN-1 or SCC’s adopted Supplementary Guidance. The ES does not include the granular, phase-by-phase workforce modelling required to understand labour demand across civils, mechanical and electrical works, commissioning and other sequential construction stages, nor does it identify workforce numbers, skills profiles, or home-vs non-home-based labour as required by the Guidance. The Applicant instead applies generic assumptions derived from previous National Grid schemes, including a fixed assumption that 10% of workers will be locally sourced, despite stating in ES Chapter 15 that this figure is based on “experience of other National Grid projects” rather than project-specific analysis of the regional labour market. This approach prevents a reliable assessment of socio-economic effects, including impacts on accommodation, transport and public services, which</p>	<p>Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy – Socio-Economic Effects of NSIPs Supplementary Guidance</p> <p>EN-1 5.13.4</p> <p>[APP-265] 15.7.13</p>

			<p>must be based on a credible and evidenced labour model.</p> <p>This is a fundamental flaw affecting the adequacy of the ES. EN-1 requires applicants to assess workforce influx across different construction phases, but in the absence of phase-specific modelling, the ES cannot demonstrate how labour demand will vary over time, how it interacts with other NSIPs in the region or how any cumulative labour market pressures will be managed. The Applicant’s commitment to share data “once available” is insufficient: the ES must be complete at submission and cannot defer core information on which impact assessments depend.</p> <p>The Examining Authority for the Sea Link Examination (EN020026) has already recognised the importance of robust, evidence-based workforce assessment and a secured Skills and Employment Strategy in the recent Sea Link Issue Specific Hearing; where the ExA required the Applicant to submit a detailed Skills and Employment Strategy to demonstrate how construction workforce demand would be managed and how local labour and skills opportunities would be maximised. Sea Link is a significantly smaller project in terms of workforce numbers and construction intensity than Norwich to Tilbury, which highlights the imperative importance of securing complete phase-specific labour assessments and</p>	<p>Oxford Brookes University, HPC Peak Construction Workforce Review, 2024</p>
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			<p>enforceable skills commitments for a scheme of this scale, duration and regional impact.</p> <p>The importance of detailed, evidence-based initial labour modelling has been highlighted by the reported experiences at Hinkley Point C where there has been major underestimation of the size of the construction workforce, with original peak workforce assessed at 5,600 but now estimated to be 12,000 (more than double the original expectation). This has resulted in substantially greater pressure on local accommodation, intensified transport impacts, greater pressure on public services and community infrastructure, as well as increased strain on the supply chain, labour availability and wage inflation.</p> <p>For these reasons, SCC considers the ES not adequate in respect of skills, education and employment and continues to require the Applicant to provide full, phase-specific labour modelling in line with SCC’s adopted methodology. SCC also expects this modelling to form the basis of a DCO-secured Skills and Employment Plan, without which the socio-economic effects of the scheme cannot be properly assessed, monitored or mitigated. A secured plan is essential for both the direct socio-economic effects and because the workforce profile influences multiple other topic areas, including transport, where the Applicant’s conclusions are dependent on the accuracy of the underlying labour demand modelling.</p>	
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<p>5.30</p>	<p>Socio-economics Recreation and Tourism</p>	<p>Table AB (49) The Applicant has stated that “<i>it is likely that a minimum of 10% of the construction workforce would be sourced from the local labour market</i>” in response to SCC’s concerns that an assumption that only 10% of the construction workforce would be drawn would the Wider Study Area risks underestimating local labour capacity and opportunity, while also failing to model displacement effects from other NSIPs.</p>	<p>SCC (Skills) does not accept the use of a fixed 10% local labour assumption, as it is not supported by transparent or project-specific evidence. ES Chapter 15 confirms that the 10% figure is based solely on National Grid’s experience on other projects and not on any assessment of local labour capacity, skills profiles, or economic activity within the Wider Study Area. This approach conflicts with SCC’s adopted Supplementary Guidance, which requires structured scenario modelling (low/medium/high), phase-specific labour demand analysis and the definition of workforce geographies co-produced with the Regional Skills Coordination Function.</p> <p>A blanket 10% assumption masks the differing labour requirements across civils, mechanical and electrical phases, prevents meaningful assessment of displacement, wage pressure and competition between simultaneous NSIPs, and undermines linked assessments, for example accommodation, transport and cumulative socio-economic effects, all of which rely on accurate labour modelling. EN-1 requires applicants to assess workforce influx across different construction phases; this cannot be achieved without phase-based labour modelling.</p> <p>SCC therefore rejects the 10% assumption as neither robust nor policy-compliant and continues to require scenario-based, phase-specific workforce modelling, to be undertaken with the Regional Skills</p>	<p>Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy – Socio-Economic Effects of NSIPs Supplementary Guidance</p> <p>EN-1 5.13.4</p> <p>[APP-265] 15.7.13</p>
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			Coordination Function and used to inform a DCO-secured Skills and Employment Plan.	
5.31	Socio-economics Recreation and Tourism	<p>Table AB (50-55)</p> <p>The Applicant has stated that the potential cumulative effect of the Scheme on competition for labour across the region to be non-significant (noting the 4,800 workers across the 4 year construction period with a peak of 1,720 workers per day).</p>	<p>SCC (Skills) does not agree that cumulative labour impacts can be considered “non-significant.” Although the ES identifies a peak workforce of 1,720 workers per day and 4,800 workers over four years, ES Chapter 15 provides no quantitative cumulative assessment of how these labour demands overlap with other NSIPs in the region, despite acknowledging their presence. The ES does not analyse phase-specific workforce peaks, skills-based overlaps, labour displacement, wage inflation risks or the combined draw on a labour market that, as per the Applicant’s own baseline evidence, already shows high economic activity rates, skills gaps, and limited spare capacity in key sectors including construction.</p> <p>SCC’s adopted Supplementary Guidance requires developers to assess labour needs alone and in combination with other projects, including modelling a worst-case home-based labour scenario and undertaking phase-based cumulative analysis in partnership with the Regional Skills Coordination Function. EN-1 further recognises that concurrent NSIPs may create short-term labour shortages. The Applicant has not provided the evidence needed to discount these risks.</p> <p>Without robust, phase-specific cumulative modelling, SCC cannot accept the conclusion of</p>	<p>Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy – Socio-Economic Effects of NSIPs Supplementary Guidance</p> <p>EN-1 5.13.4</p> <p>[APP-265]</p>

			“non-significance.” SCC therefore requires full cumulative labour assessment and expects this to inform a DCO-secured Skills and Employment Plan.	
5.32	Socio-economics Recreation and Tourism	<p>Table AB (56-62)</p> <p>The Applicant has rejected the request of SCC to:</p> <ul style="list-style-type: none"> i. participate in the Regional Skills Coordination Function (“RSCF”) framework, ii. participate in the Major Infrastructure Forum, iii. co-fund or support targeted skills interventions linked to the project phases, iv. work with SCC to design monitoring frameworks to evidence outcomes. <p>Instead, the Applicant has proposed working with local suppliers and supporting the Chambers of Commerce, contributing to coordinated regional approach to electricity industry jobs and skills planning and engaging with Local Authorities to understand local priorities and opportunities around skills and employment. Further, the Applicant has stated that its commitment to community benefits to deliver initiatives is their preferred medium</p>	<p>SCC (Skills) considers the Applicant’s position to be inadequate and inconsistent with both SCC’s adopted Supplementary Guidance and EN-1. The Guidance requires NSIP promoters to work through the Regional Skills Coordination Function to coordinate labour demand, develop skills pipelines, and manage cumulative impacts arising from multiple simultaneous NSIPs. ES Chapter 15 confirms that, instead of participating in these established governance structures, National Grid proposes to address skills matters through its Community Grant Scheme, which sits outside the DCO and is explicitly not part of EIA mitigation processes. Community benefit schemes are voluntary, unenforceable and not aligned to construction phasing; they therefore cannot be relied upon as socio-economic mitigation.</p> <p>SCC further emphasises that the Applicant’s refusal to participate in the RSCF fundamentally undermines the purpose for which the RSCF was established. The RSCF provides a single regional mechanism for coordinating labour demand forecasts, analysing shared skills requirements, developing training pipelines and managing cumulative NSIP pressures. If the Applicant instead undertakes these activities in isolation, it risks creating duplication, inefficiency and</p>	<p>Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy – Socio-Economic Effects of NSIPs Supplementary Guidance</p> <p>EN-1 5.13.10-5.13.12</p>

		<p>rather than any Requirement via the vehicles of the DCO process.</p>	<p>fragmentation, with multiple projects independently commissioning labour studies, training needs assessments and interventions that should instead be unified. This approach diminishes the region’s ability to plan coherent provision with colleges and training providers, produces inconsistent labour market intelligence, and prevents the holistic management of workforce pressures that EN-1 explicitly anticipates when it notes that concurrent NSIPs may create short-term labour shortages affecting other projects and industries. The Applicant’s decision not to participate in the RSCF therefore directly weakens the regional capacity to anticipate, mitigate and jointly manage cumulative labour impacts.</p> <p>Without participation in the RSCF, the Major Infrastructure Forum, or co-designed monitoring frameworks, the Applicant cannot demonstrate that labour market impacts, including cumulative pressures, will be effectively managed. Nor has the Applicant committed anywhere in the ES or Deadline 1 submissions to a DCO-secured Skills and Employment Plan. SCC therefore maintains that a secured Plan is essential. A DCO-secured Skills and Employment Plan provides the necessary enforceable mechanism to translate labour modelling into delivery: including phase-specific workforce forecasts, defined training and apprenticeship commitments, targeted interventions to address skills</p>	
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			<p>shortages and a robust monitoring framework. EN-1 makes clear that the Secretary of State must consider positive secured socio-economic mitigation when weighing impacts and benefits.</p> <p>Without these secured measures, the project lacks any credible mechanism to mitigate socio-economic impacts, to coordinate effectively with other NSIPs or to maximise local employment opportunities. The absence of a DCO-secured Skills and Employment Plan therefore represents a significant gap that must be addressed.</p>	
5.33	Traffic and Transport	<p>Table AB (65)</p> <p><i>“The proposed construction core working hours (unless otherwise approved by the relevant planning authority) are:</i></p> <ul style="list-style-type: none"> • <i>Monday – Friday: 0700 to 1900</i> • <i>Saturday, Sunday and Bank Holidays/Public Holidays: 0700 to 1700</i> <p><i>Details relating to the proposed construction working hours and any associated restrictions are contained within 6.4 Environmental Statement Chapter 4 - Project Description [APP-130]. The working hours are secured through Requirement 7 of Schedule 3 of 3.1 draft Development Consent Order [APP-056] (draft DCO). The assessment within the Environmental Statement (ES) (Volume 6 of the</i></p>	<p>As a Local Highway Authority (“LHA”), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on road users and local communities and propose typical working hours of Monday-Friday 0700-1900 and Saturday 0800-1300. This may be exacerbated in areas subject to significant seasonal fluctuation such as agriculture or tourism.</p> <p>Noting the Applicant’s comments, SCC (Highways) remains concerned about working 7 days a week. Even where work is scattered across the area transport impacts in particular can condense along specific routes which negates this. SCC continues to oppose to 7 day a week working. Other NSIPs in Suffolk have been built using 5 or 6 days working, and this approach also offers some respite for the local</p>	

		<p><i>DCO application) is based on a set of parameters, this includes the core working hours for the construction phase of the project. The construction works are largely linear and would not occur along the entire length of the Project for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific geographical area. Varying shift patterns for workers and construction crews mean that downtime would occur at specific locations within the working week. These shift patterns would be rolling, and with workers not undertaking a five-day working week, the days on which downtime may occur would vary from week to week, and working will not take place every weekend or bank holiday [...]</i></p>	<p>population and that sufficient flexibility is already built into the dDCO (Requirement 7 (4)).</p>	
5.34	Traffic and Transport	<p>Table AB (67)</p> <p><i>“National Grid Electricity Transmission (NGET) substations are designed to operate unmanned under normal conditions, resulting in very low operational vehicle movements.</i></p> <p><i>The number of vehicle trips generated by the operation and maintenance of the Project are unlikely to result in significant effects and it was therefore considered acceptable to scope this matter out. This was agreed by the</i></p>	<p>Whilst SCC (Highways) accepts that most transport impacts for the operational phase are scoped out it considers that the AIL operational movements should be included with assessment. This is due to concerns about the resilience of the routes, for example being compromised by weight or other limits being placed on the network, together with the impacts of any temporary measures to overcome these. SCC accepts that inclusion of improvements to the Lorraine Way / Bullen Lane junction is a move towards this.</p>	

		<p><i>Planning Inspectorate as stated within the 6.20 Scoping Opinion [APP-297]. As noted in Section 2.3.28 of the Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310], access to substations is required for construction, operation, and maintenance, with a permanent access route to be provided to enable 24/7 access.</i></p> <p><i>The Applicant assessed access requirements to existing and proposed substations to be used as part of the Project and identified permanent highway modifications to facilitate future access, including, for Bramford Substation, the permanent widening of the carriageway on Bullen Lane and at the junction of Bullen Lane and Lorraine Way. Whilst the Applicant considers that these proposed improvements are sufficient and proportionate, it welcomes further dialogue with SCC to understand the specifics of SCC’s concerns about the resilience of routes.”</i></p>	<p>For clarity SCC’s concern is that a resilient route is available for AILs, particularly special order movements during the operational phase of this project. Statements made by NGET in the Sea Link examination have referred to the undertaker successfully replacing 100 transformers in the past 10 years clearly shows that access is needed in the operational phase for refurbishment. SCC is seeking a commitment that the applicant continues to engage with the authority to achieve this.</p>	
5.35	Traffic and Transport	<p>Table AB (68)</p> <p><i>“Whilst the measures for using agreed construction site access and haul roads within 7.3 Outline Construction Traffic Management Plan [APP-309] are applicable to the pre-</i></p>	<p>SCC (Highways) understands that the DCO includes construction of the temporary accesses within the definition of pre-commencement whilst the OCTMP states it will be inclusive of these works. This places a tension between the OCTMP commitment to use of agreed site access and haul roads and that</p>	

		<p><i>commencement activities, 7.3 Outline Construction Traffic Management Plan [APP-309] also details that the construction of the access points does not require the haul roads to be built and that they can be built from the local highway network.</i></p> <p><i>While 3.1 Draft Development Consent Order [APP-056] includes the construction of temporary accesses within the definition of pre-commencement operations, this does not extend to haul roads. Haul roads are not considered temporary accesses and are therefore not permitted as part of pre-commencement works.”</i></p>	<p>construction of the haul road will be post-commencement.</p> <p>For complete clarity can the applicant confirm that temporary access to provide access to haul roads and works for haul roads crossing the public highway are not included in the pre-commencement works.</p>	
<p>5.36</p>	<p>Traffic and Transport</p>	<p>Table AB (70)</p> <p><i>“National Grid would welcome further engagement with SCC Highways in order to better understand their concerns on this point.</i></p> <p><i>Notwithstanding those future discussions, National Grid considers that the provisions are appropriate in the context of this Project. The disapplication in Articles 13(3) and (4) of 3.1 Draft Development Consent Order [APP-056] has been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to</i></p>	<p>SCC (Highways) states that disapplication of parts of the New Roads & Street Works Act 1991 (the 1991 act) should not fetter LHA in managing highway network (co-ordination), recovering reasonable costs and avoidance of long-term maintenance costs.</p> <p>The comments refer to article 13 (3) (e) to (h) and (4) specifically (3) (g) which removes the undertaker from duties under NRSWA.</p>	

		<p><i>Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.</i></p> <p><i>Regarding the LHA’s coordination role, Article 12(1) of 3.1 Draft Development Consent Order [APP-056] confirms that the Permit Schemes operated by LHAs apply and will be used by National Grid (or, where appropriate, UK Power Networks) in connection with the construction and maintenance of the authorised development. The Applicant considers that this provides adequate safeguards to ensure that the LHA will continue to be able to coordinate works on its highway network.”</i></p>		
5.37	Traffic and Transport	<p>Table AB (74)</p> <p><i>“As detailed within 7.3 Outline Construction Traffic Management Plan [APP-309], the Applicant will put in place robust procedures to inform and supervise all personnel on the Project, with contractual requirements placed on the Main Works Contractors. The Applicant is to be held responsible for any breach of compliance as detailed within 7.3 Outline Construction Traffic Management Plan [APP-309]. 7.3 Outline Construction Traffic Management Plan [APP-309] is secured within</i></p>	<p>The Applicant will need to retain overall control of the Construction Traffic Management Plan (“CTMP”) particularly if multiple contractors are responsible for the roles as occurs in other similar projects.</p> <p>SCC (Highways) comments reflect experience delivering NSIPs where difficulties have been experienced when roles have been delegated to contractors, such as the contractor being unaware of agreed AIL routes, and failing to deliver approved highway works.</p>	

		<p><i>Requirement 4 of 3.1 Draft Development Consent Order [APP-056], with the Applicant responsible for the overall compliance. The Applicant will therefore work with the multiple (if required) Main Works Contractors to ensure consistency of application.”</i></p>		
5.38	Traffic and Transport	<p>Table AB (79-81)</p> <p><i>“The construction vehicle volumes have been determined through a comprehensive trip generation exercise, which was activity specific, rather than basing the numbers off similar schemes. The construction vehicles are reflected through the anticipated peak day vehicle numbers for each construction activity. The Applicant completed an exercise following the presentation of the trip numbers in 7.11 Transport Assessment [APP-333] to ensure the suitability of the proposed Primary Access Routes (PARs) with the anticipated vehicle numbers. 6.16 Environmental Statement Chapter 16 - Traffic and Transport [APP-271] assessed the likely impact along those roads forming the PARs, where there would be an increase in traffic as a result of the construction of the Project in combination with committed developments. Where required, mitigation measures have been proposed to</i></p>	<p>The estimate numbers of HGVs are similar to other energy projects (EA1(N), Bramford to Twinstead). This volume of movements will have negative impact for the highway network in the construction period, most noticeable, but not exclusively, on minor roads where existing HGV use is low.</p> <p>With the number of NSIPs and other large infrastructure projects in East Anglia significant pressure is being put on the available facilities for HGV drivers and this matter should be considered by the applicant. 81. The authority recognises there is balance between a haul road dominated access plan as in this application and the alternative of many local accesses. The former requires significant volumes of material for haul roads but avoids use of unsuitable local roads and in the case of Norwich to Tilbury the impacts in highway terms are lessened by the projects approach. Note that this may not be the best solution for other disciplines.</p> <p>SCC (Highways) notes the comments regarding facilities in Essex and hope that the same measures</p>	

		<p><i>reduce significant environmental effects on sensitive receptors. National Grid developed 7.3 Outline Construction Traffic Management Plan [APP-309], the purpose of which is to monitor, mitigate and manage the impacts around construction traffic.</i></p> <p><i>The Applicant notes SCC’s comments regarding the Project’s haul road based access plan (strategy). The principles for siting and designing access routes are set out in CoCP Sections 2 and 6. These confirm that existing access routes will be used wherever practicable, with temporary access roads carefully sited and micro-sited to minimise land take and avoid sensitive receptors. The use of a largely continuous haul road is addressed by Commitment GG33, with ecological constraints covered by Commitment B02.</i></p> <p><i>The Applicant notes SCC’s comment about facilities for HGV drivers. Construction traffic to be generated by the Project and its routeing has been assessed and where any significant effects have been identified on the surrounding highway network, mitigation measures are proposed within the 7.3 Outline Construction Traffic Management Plan [APP-309] or are</i></p>	<p>are provided in Suffolk. The concern about driver welfare reflects experience in East Suffolk where a lack of facilities led to an increase in HGVs using highway laybys. While not unlawful this has had negative impacts on residents who live on or adjacent to these laybys including antisocial behaviour such as littering or fouling verges.</p>	
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		<p><i>under discussion with the relevant highway authority.</i></p> <p><i>A detailed Construction Traffic Management Plan (CTMP) will be developed and approved by Essex County Council post consent under Requirement 4 of Schedule 3 of the 3.1 Draft Development Consent Order [APP-056]. This will include further details of measures for Heavy Goods Vehicle (HGV) drivers to have appropriate breaks by utilising fully equipped service stations where appropriate. HGV drivers will also be encouraged to use welfare facilities on-site rather than local facilities within Essex. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/rests as part of their journey, it is not expected that stopover/rest facilities in Essex will be significantly impacted.</i></p> <p><i>Hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMP will</i></p>		
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		<i>include measures to encourage HGV drivers to use welfare facilities on-site.”</i>		
5.39	Traffic and Transport	<p>Table AB (85)</p> <p><i>“[...] The Applicant acknowledges the existing road safety concerns at the A140/A143 Stoke Ash junction and concern for driver frustration. However, the level of mitigation required at the junction to resolve the existing safety issues is considered to go beyond what is reasonable and proportionate for a temporary Project with short-term effects which would have limited impact on driver delay as the duration of the peak is expected to be of one week. The Applicant would welcome further discussions with Suffolk County Council [...]”</i></p>	<p>SCC (Highways) have yet to review the details of the assessment. However, based on the information available SCCs specific concerns are: a. safety, particularly at evolved junctions where delays joining the main carriageway may result in driver frustration. b. that the impacts on the Major Road Network (“MRN”) are not considered, in the case of Suffolk specifically the road safety at the A140/A143, Stoke Ash junctions. c. there is a reliance on others providing mitigation at the A1071/B1113 e. g. Beagle Roundabout</p> <p>For clarity the junction referred to by SCC is the crossroads on the A140 at Stoke Ash (Norwich Road IP23 7ET) not the A140/A143 junction at Stuston. While the peak may only be one week it is the duration of the use of the A140 for construction vehicles for the duration of the project.</p>	
5.40	Traffic and Transport	<p>Table AB (86)</p> <p><i>“7.3 Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310] outlines the process for checking the structural capacity of structures along the proposed AIL routes, stating that a case-by-case approach is</i></p>	<p>Potential improvements for passage of AILs has not been considered such as the A1120 Cedars Link and A140 Brockford Street Bridge which have restrictions on AIL use.</p> <p>7.3 Outline Construction Traffic Management Plan Appendix A - Abnormal Indivisible Load (AIL) Access Strategy [APP-310] outlines the process for checking</p>	[APP-310]

	<p><i>necessary. The document further states that, in the case of Local Highway Authority structures, structural assessments will be undertaken as necessary to confirm suitability, with the provision of structural information by the Local Highway Authorities. Potential improvements for the passage of AILs will be informed by the findings of said structural assessment once sufficient record information has been provided by the asset owner. This allows for the Applicant to assess each structure against the specific Project vehicle specifications and to investigate potential mitigation measures. Should this process conclude that no mitigation measures are suitable, the Applicant would seek alternative access for the AIL.</i></p> <p><i>The formal notification of AIL movements will follow the Electronic Service Delivery for Abnormal Loads (ESDAL) system and be undertaken by the appropriate appointed haulage contractor closer to the proposed date of the specific movement. They will follow all formal processes required, which encompasses verification of structures along the access routes prior to movements taking place.</i></p> <p><i>The restrictions noted are subject to further review and the Applicant is working with the</i></p>	<p>the structural capacity of structures along the proposed AIL routes, stating that a case-by-case approach is necessary. The document further states that, in the case of Local Highway Authority structures, structural assessments will be undertaken as necessary to confirm suitability, with the provision of structural information by the Local Highway Authorities. Potential improvements for the passage of AILs will be informed by the findings of said structural assessment once sufficient record information has been provided by the asset owner. This allows for the Applicant to assess each structure against the specific Project vehicle specifications and to investigate potential mitigation measures. Should this process conclude that no mitigation measures are suitable, the Applicant would seek alternative access for the AIL.</p> <p>Taking Stowmarket as an example AIL restrictions on the A14 Hillhouse Viaduct and the A1120 Cedars Link Viaduct mean there is no special order route along the A14 corridor at this point. However, SCC welcomes commitments made by the applicant to continue discussion on this matter.</p>	
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		<i>Local Highway Authority to progress this appropriately.”</i>		
5.41	Landscape and Visual	<p>Table AB (91-92)</p> <p>The Applicant defends its position with regards to its assessment, landscape and visual mitigation, compensation, landscape proposals, change requests and alternatives.</p>	<p>SCC (Landscape) disagrees with several aspects of the Applicant’s position. SCC’s views are detailed in the Joint Local Impact Report, its Annexes [REP1-178] and its Appendices [REP1-179].</p> <p>SCC does not expect the Applicant to compensate for every residual effect, irrespective of the degree of impact, and considers that a proportionate approach is appropriate. However, SCC does not consider that effects which are assessed to be non-significant should automatically be discounted or disregarded simply for that reason when applying the mitigation hierarchy. SCC considers that the collective impact of several 'minor' effects on the same receptor or receptors (which may be a landscape feature such as a river valley or a series of connected viewpoints experienced by the same visual receptors, such as views along a recreational route/PRoW) may justify mitigation and/or offsetting. Moreover, SCC does not consider that the Applicant has adequately mitigated or compensated as far as possible for the identified significant adverse effects on the landscape resource and on visual receptors.</p> <p>While accepting that not all residual adverse effect can be mitigated, SCC considers that the Applicant needs to deliver further improvements to its scheme in terms of landscape and visual mitigation and</p>	<p>[REP1-178]</p> <p>[REP1-179]</p>

			<p>landscape scale appropriate compensation, in the following key areas:</p> <ul style="list-style-type: none"> • Waveney Valley • Mellis Common/Gislingham • Gipping Valley • Bramford/Burstall • Dedham Vale National Landscape • CSE compounds <p>SCC is particularly disappointed with the Applicant's position reading the Waveney Valley. From considering undergrounding (which in landscape and visual terms would have been appropriate and which was dismissed not because it was unnecessary, but because it was technically too difficult), the Applicant is now pointing out that there is no Special Landscape Area within the Study Area, implying that there is no justification for a comprehensive scheme of mitigation and compensation in this area. The Applicant is ignoring the fact the Special Landscape Areas have been removed from the Suffolk Local Plans, so therefore cannot cover any areas. Prior to this, the parts of the Waveney Valley were designated as Special Landscape Areas (as in the Mid Suffolk Local Plan 1998 (superseded)).</p>	
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			<p>SCC is asking for a specific approach for a specific area for specific and identified harm.</p> <p>SCC has provided evidence that the Waveney is a highly valued and highly sensitive landscape (Annex B [REP1-178] and Appendix 22 [REP1-179]).</p> <p>With regards to the wider Bramford substation area, SCC’s ask for strategic placemaking is less based on EIA requirements and instead grounded in National Grid’s own business plan to deliver environmental goals as part of its business plan. Here is an opportunity for National Grid to fulfil the aspirations of its business plan in relation to its environmental obligations by delivering a co-ordinated approach of its own infrastructure and with that of its connection customers.</p> <p>SCC will provide further comments at Deadline 3, when the Applicant will have had the opportunity to review and comment on the Joint LIR, its Annexes [REP1-178] and its Appendices [REP1-179].</p>	
5.42	Airfields	<p>Table AB (236)</p> <p><i>“The Applicant has welcomed SCC support to its engagement with aviation stakeholders including the Civil Aviation Authority Airfields Advisory Team (“CAA AAT”), the General Aviation Awareness Council (“GAAC”) and aerodrome operators.</i></p>	<p>Notwithstanding the Applicant’s assertions that Raydon Wings is not adversely impacted, SCC (Planning) maintains that it will and would like to reiterate this by reference to the concerns expressed by itself [REP1-178] and [REP1-179], the airfield operator [RR-0915], the GAAC [RR-1224] and the CAA AAT (Appendix 25 and 26 of the Joint LIR) [REP1-179].</p>	<p>[REP1-178] [REP1-179] [RR-0915] [RR-1224]</p>

		<p>6.15.A2 <i>Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] further describes the Applicant’s consultation approach to inform its assessment of aviation impacts. Paragraphs 15.4.12 to 15.4.18 provide detail on assessments relating to Raydon Wings aerodrome, and design changes implemented in response to stakeholder feedback to minimise impacts, where possible. Furthermore, adverse effects on the aerodrome are summarised within 6.15 Environmental Statement Chapter 15 – Socio-economics Recreation and Tourism [APP-265] with residual effects assessed to be temporary, short-term, minor adverse and not significant during construction, and permanent, long-term, negligible and not significant during the Project’s operation and maintenance.”</i></p>		
5.43	Draft DCO	<p>Table AB (241-244)</p> <p>Schedule 4 (discharge of requirements) (paragraph 1, timescales)</p> <p><i>“National Grid acknowledges these comments.</i></p> <p><i>However, National Grid considers that the time limits included within Schedule 4 to 3.1 Draft Development Consent Order [APP-056] are</i></p>	<p>For the reasons stated in SCC’s RR [RR-3520], the Council considers that the 28-day decision-making period to be insufficient.</p> <p>The equivalent period in the Bramford to Twinstead Reinforcement Order is 35 days. SCC’s experience of determining applications for the discharge of requirements for that Order have shown that 35 days is insufficient. For example, in SCC’s experience, the provision of 35 days, as opposed to 56 days, has been counterproductive to the prompt delivery of energy</p>	

	<p><i>necessary and proportionate to each of the applications proposed to be made in this case, whilst ensuring that the delivery of the Project, which is of critical importance to the UK government’s Clean Power target of 2030, is not unnecessarily delayed by means outside the control of the Applicant.</i></p> <p><i>Furthermore, Annex 2 of the National Energy System Operator’s (NESO) Clean Power 2030 Report published in November 2030 identifies that if the Applicant delivers the Project by the end of 2031 instead of by the end of 2030, the consumer would be exposed to additional constraints costs in excess of £2.5 billion. This equates to £7 million for every day that the energisation of the Project is delayed into 2031.</i></p> <p><i>It is noted that there is already scope within Paragraph 1(1)(c) of Schedule 4 (Discharge of Requirements) to extend the 28-day period for the discharge of Requirements by agreement in writing between the undertaker and the relevant authority.</i></p> <p><i>In any case, National Grid will nevertheless negotiate Planning Performance Agreements as necessary and at the appropriate time, to ensure SCC, and other relevant host</i></p>	<p>infrastructure projects. 56 days allows the discharging authority to ensure that consultees, including statutory consultees, respond within the decision period with enough time for any objections to be resolved with the Applicant. When the decision period is only 35 days, SCC has found that there is insufficient time for objections to be resolved resulting in extensions of time being agreed or applications being rejected. In either case, the Applicant’s delivery programme is compromised due to delay. On occasion, this has resulted in Applicants rushing to make amendments which do not address the issues raised, resulting in further amendments needed to allow the requirement to be discharged. This sometimes leads to the decision period being extended beyond 56 days. SCC has not encountered this problem where it has 56 days to decide applications which rarely, if ever, require extensions of time. Therefore, SCC considers that a decision period of 56 days to be more conducive than 28 or 35 days to the delivery of critical energy infrastructure.</p>	
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		<i>authorities, are able to respond on programme.”</i>		
5.44	Draft DCO	<p>Table AB (245)</p> <p>Schedule 4 (discharge of requirements) (paragraph 3, fees)</p> <p><i>“National Grid acknowledges SCC’s submission and will submit revised drafting which reflects the extant national fee schedule applicable to the discharge of planning conditions.</i></p> <p><i>However, it is not clear to National Grid on what basis SCC consider the refund mechanism in Paragraph 3(2) to be unreasonable, given the circumstances in which a refund could fall due would be within SCC’s control. It would be helpful if SCC could further clarify its concerns on this point.”</i></p>	<p>SCC has submitted additional clarification on this matter in the Joint LIR [REP1-178], namely in paragraphs 14.74 – 14.80.</p>	[REP1-178]
5.45	Health and Wellbeing	<p>Table AB (253)</p> <p><i>“No significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures. However, the Applicant recognises that uncertainty whilst the proposals are developed may cause anxiety. The Applicant has sought to reduce potential effects on communities</i></p>	<p>SCC (Public Health) considers that the conclusion that <i>“no significant health and wellbeing impacts have been identified and as such there is no requirement for monitoring measures”</i> is inconsistent with a precautionary approach. The absence of a significant effect does not negate the value of proportionate monitoring where there is community uncertainty, a prolonged construction period, or potential psychosocial impacts arising from disruption,</p>	

	<p><i>and residents through routeing and design. The Applicant has also sought to reduce concern or uncertainty about the proposals through early and transparent engagement with communities and stakeholders throughout the development of the Project. The Project team will continue to engage with people potentially affected during progress of the Project, through regular communication including letters, phone calls and meetings. This would enable concerns to be raised and discussed at an early opportunity and provide a regular point of contact to respond to queries and concerns.</i></p> <p><i>253b - Information relating to how community feedback received during consultation has helped influence and shape the proposals to date can be found in 5.1 Consultation Report - Appendix B: 2022 non-statutory consultation [APP-068] and 5.1 Consultation Report - Appendix C: 2023 non-statutory consultation [APP-069] respectively.</i></p> <p><i>253c and d - 7.2 Outline Code of Construction Practice Appendix E - Community Engagement and Public Information [APP-305] sets out the communications channels and approach to community engagement during the construction of the Project. This includes the appointment of a community relations team to</i></p>	<p>perceived risk, and cumulative development. Monitoring in this context is not solely a mitigation measure triggered by significance thresholds, but a mechanism to validate the assumptions made within the assessment and to enable adaptive management where real-world impacts differ from those predicted.</p> <p>SCC (Public Health) also notes that the Project is expected to involve a prolonged construction programme with geographically shifting activity along the route. Whilst individual locations may experience shorter periods of intensive activity, communities along the wider route may experience uncertainty, intermittent disruption, and cumulative strain over a number of years. Construction activities may influence wellbeing in many ways, including noise exposure, disruption in access to social infrastructure (including healthcare) and to recreational routes, perceptions of risk associated with infrastructure such as EMFs, and cumulative amenity effects. These pathways reinforce the value of proportionate monitoring arrangements to ensure that emerging health and wellbeing issues can be identified and addressed at an early stage.</p> <p>SCC (Public Health) welcomes that the Applicant’s commitment to ongoing engagement and communication with affected communities. However, engagement alone does not constitute monitoring of health and wellbeing outcomes. Structured</p>	
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		<p><i>engage with local residents and provide dedicated communications support. The Applicant will continue to engage openly with local authorities along the Project route.”</i></p>	<p>monitoring arrangements are necessary to identify trends, assess whether mitigation measures remain effective, and provide transparency and reassurance to communities and partner organisations. SCC (Public Health) therefore reiterate that a proportionate Mental Health and Wellbeing Monitoring Plan should be implemented for the duration of the Project, covering the construction phase and early years of operation, with clear reporting routes and defined review points.</p> <p>With respect to monitoring of mental health and wellbeing and baseline data, it should be noted that reliance solely on publicly available GP or Primary Care data would be insufficient, as this captures only those individuals who actively present and self-report. This approach risks underrepresenting wider community impacts, particularly among individuals who experience stress, anxiety or wellbeing deterioration but do not engage with formal health services.</p> <p>Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views are influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, survey and qualitative approaches can provide valuable</p>	
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			<p>triangulation when designed appropriately and interpreted alongside service data.</p> <p>Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include:</p> <ul style="list-style-type: none"> • Population Health Management (“PHM”) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services • Engagement with Primary Care leads within the project catchment to identify emerging trends • Regular liaison with Community Mental Health Teams • Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately) • Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue • Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work 	
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			<p>undertaken by Suffolk MIND¹ and University of Suffolk.²</p> <p>In addition to the monitoring mechanisms described above, SCC (Public Health) recommend that the Applicant clarifies the escalation process should monitoring or stakeholder feedback indicate emerging health or wellbeing concerns. This should include defined reporting routes to relevant local authorities and health partners, together with a commitment to review and, where necessary, adapt mitigation measures in response to emerging evidence.</p>	
5.46	Health and Wellbeing	<p>Table AB (268-270)</p> <p>SCC notes the Applicant’s justification for extended core working hours, including routine Sunday and Bank Holiday working, and the statement that prohibiting such hours “<i>would remove this necessary flexibility.</i>”</p>	<p>SCC (Public Health) acknowledges the programme pressures described, however, SCC (Public Health) maintains that predictable respite periods are essential to protect mental wellbeing, sleep, and quality of life. The Applicant’s assertion that start-up and close-down activities may occur outside core hours further increases concern. SCC (Public Health) therefore reasserts its position that core hours should be restricted. Specifically, working hours should be restricted to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working, and that any deviation should require advance agreement with LPA’s and affected communities. SCC (Public Health) emphasises that flexibility for the Applicant cannot outweigh the</p>	

¹ <https://www.suffolkmind.org.uk/reports-and-accounts/>

² <https://www.uos.ac.uk/about/news/2025/university-publishes-independent-study-on-early-impacts-of-sizewell-c/>

			predictable and sustained amenity needs of local residents over a multi-year construction programme.	
5.47	Draft DCO	<p>Table AB (288)</p> <p><i>“The Applicant notes SCC’s comments regarding the need for various legal agreements. As SCC will be aware, the Applicant has prepared Heads of Terms in relation to:</i></p> <ul style="list-style-type: none"> <i>i. A unilateral undertaking to be given pursuant to s.106 of the Town and Country Planning Act 1990 (“a s.106 agreement”) to secure the provision of Biodiversity Net Gain, as set out in the BNG Report</i> <i>ii. A s.106 agreement to secure the off-site compensation planting of replacement trees</i> <i>iii. A statutory agreement to be made to secure payment of compensation by the Applicant to further the statutory purposes of conserving and enhancing the natural beauty of the Dedham Vale National Landscape. The Applicant remains open to consider the necessity of any other planning obligations. However, any planning obligation must</i> 	<p>SCC detailed in its Relevant Representation [RR-3520] the schedules that SCC considers necessary to include in a Section 106 (of the Town and Country Planning Act 1990) Agreement (otherwise known as a Planning Obligation).</p> <p>Further, SCC understands from Essex Police and Suffolk Constabulary (as heard in Open Floor Hearing 1 [REP1-232]), that a further schedule related to Abnormal Indivisible Load (“AIL”) movements should be included. The purpose of this schedule would be to ensure sufficient resource is available to the relevant authorities to escort and facilitate AIL movement across the Scheme.</p>	<p>[RR-3520]</p> <p>[REP1-232]</p>

		<p><i>be in accordance with the legal tests in regulation 122 of the Community Infrastructure Levy Regulations 2010:</i></p> <ul style="list-style-type: none"> <i>iv. necessary to make the development acceptable in planning terms;</i> <i>v. directly related to the development; and</i> <p><i>fairly and reasonably related in scale and kind to the development.”</i></p>		
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Table 6: 8.4.3 (A) Report on Interrelationship with Other Infrastructure Projects [REP1-134]				
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC’s Comments	References
6.1	Overall Approach	<p><i>“This report considers the ten Nationally Significant Infrastructure Projects (NSIPs) listed in the Rule 6 Letter and the Tarchon Interconnector Project. As requested by the ExA and Mid Suffolk District Council in the Issue Specific Hearing 1 on Friday 13 February 2026, this report also considers EcoPower Suffolk Solar. It also considers other projects that are shortlisted in 6.17.A2 Environmental Statement Appendix 17.2 - Long List and Short List of Other Developments [APP-283] (Environmental Statement (ES) Chapter 17 Appendix 17.2). However, the objective of that appendix differs from the focus of this report. The assessment therein focuses on environmental effects arising from the Project in combination with other projects. This report focuses on the other projects in the short list with which the Project has a physical interface, and the design solutions and outcomes from engagement arising from such interfaces. This report does not aim to replicate the detailed information and conclusions in ES Chapter 17; rather, as requested by the ExA, it starts from the same set</i></p>	<p>In its Joint LIR [REP1-178], SCC raised in paragraphs 10.3 and 10.5 concerns regarding the Applicant’s decision to scope out other projects from the considerations of cumulative effects in regard to workforce pressures and employment. Upon reviewing the Report on Interrelationship with Other Infrastructure Projects [REP1-134], SCC considers that the Applicant has opted to limit the scope to discussing only those other infrastructure projects which have a physical interface with the Project. Namely, in addition to those included, SCC would have expected that the report would mention and address: Sizewell C, Sea Link, LionLink, Sunnica Energy Farm, and Kingsway Solar Farm. Each of these projects will have a temporal overlap with the construction of the Proposed Development and therefore result in competition of labour amongst skilled professions.</p> <p>Therefore, SCC considers the Report on Interrelationship with Other Infrastructure Projects [REP1-134] to be deficient. This will result in missed opportunities to coordinate mitigations for</p>	

		<i>of projects identified in the ES Chapter 17 Appendix 17.2 short list and provides information about their progress and the Project’s consideration of interrelationship in summary form.”</i>	cumulative effects in the region in regard to workforce pressures, amongst other issues.	
6.2	Landscape and Visual	Table 6.1 Interaction with other projects’ mitigation and enhancement proposals DCO2 EN020002 Bramford to Twinstead	SCC (Landscape) welcomes that an area has been designated (immediately west of Bramford Substation) within Bramford to Twinstead’s Order Limits to provide an environmental area to deliver mitigation planting. However, SCC considers that this falls short of a strategic and co-ordinated landscape masterplan approach that the Councils considers to be required for the wider Bramford and Burstall area.	
6.3	Landscape and Visual	Table 6.1 Interaction with other projects’ mitigation and enhancement proposals EN0110019 EcoPower Suffolk Limited	SCC (Landscape) would welcome further information regarding how the oversailing between RG11 and RG12 affects the mitigation proposals for EcoPower Suffolk Limited.	
6.4	Health and Wellbeing	Table 6.1 Interaction with other projects’ mitigation and enhancement proposals	SCC (Public Health) notes that [REP1-132] does not reference health or wellbeing considerations, nor does it identify any potential for cumulative or inter-project interactions affecting community health outcomes. It is recognised that detailed assessment of health pathways sits primarily within [APP-192] and the cumulative assessment in [APP-281] , however, the absence of any discussion of health-	[REP1-132] [APP-192] [APP-281]

			<p>related interrelationships in the report limits completeness given the scale and geographic overlap of multiple NSIPs across Suffolk and the wider region.</p> <p>Public Health considers that cumulative amenity effects, prolonged construction programmes, uncertainty about phasing, overlapping workforce demands and repeated disruption to Public Rights of Way can contribute to wider impacts on community health and wellbeing. These pathways are inherently influenced by inter-project interactions, even where individual schemes apply best practicable mitigation.</p> <p>In this context, Public Health considers that there is potential for inter-project effects on community health and wellbeing. Proportionate measures to help manage potential disruption and provide reassurance to local communities include the incorporation of predictable respite periods through restricting core working hours in line with comments detailed in Table Item 5.46 (above), together with the implementation of a proportionate health and wellbeing monitoring framework as outlined in Table Item 5.45 (above).</p>	
6.5	Good Design	<p>7.1.6 “As confirmed in paragraph 5.6.8 of 7.15 Design and Access Statement [APP-353] and in recognition of the importance of good design, the Project is committed to appointing a design</p>	<p>SCC queries when/at what stage the Design Champion will be appointed and whether the Design Champion should not be appointed early in the</p>	<p>[RR-3520] [REP1-132]</p>

		<p><i>champion. The appointed design champion will support robust governance, uphold the Project’s design principles, and ensure alignment and cooperation with other major infrastructure developments is maintained throughout the full lifecycle of the project. The appointment of a design champion is supported by NPS EN-1.”</i></p>	<p>project’s development to inform and shape the design, including embedded mitigation.</p> <p>SCC addressed in its Relevant Representation [RR-3520], within paragraph 145 and 146, that the Design Champion should be engaged sufficiently early in the development of the project. SCC considers that the Applicant’s response [REP1-132] to this matter did not directly address this matter, and therefore SCC requests clarity on the timeline for the appointment.</p>	
6.6	Cumulative Impact	<p>7.2.2 <i>“The Applicant undertook the siting study and identification of the EACN substation zone (7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]). North Falls Offshore Wind Farm and Five Estuaries Offshore Wind Farm subsequently designed their onshore substations to co-locate within this zone and engaged with the Applicant to ensure compatibility with the evolving EACN design. This has included alignment on layout, access, drainage, landscape strategy and other engineering parameters to ensure coordinated and efficient long-term solutions.”</i></p>	<p>The Council notes that, in February 2026, the Five Estuaries and North Falls Offshore Wind Farms published a Joint Design Guide for their co-located substations near the EACN.</p> <p>SCC welcomes the facilitator role that National Grid undertook to enable this development, resulting in this example of good design.</p>	