

NORWICH TO TILBURY

EN020027

Comments on Submissions received at Deadline 6

Suffolk County Council 

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Glossary of Acronyms

AMS-OWSI	Archaeological Mitigation Strategy and Outline Written Scheme of Investigation
CoCP	Code of Construction Practice
DCO	Development Consent Order
LIR	Local Impact Report
LPA	Local Planning Authority
NSIP	Nationally Significant Infrastructure Project
PPA	Planning Performance Agreement
SCCAS	Suffolk County Council Archaeological Service

“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 6 ("**D6**") for Norwich to Tilbury. Examination Library references are used throughout to assist readers.

Comments on submissions received at Deadline 6

Table 1: 3.1 (F) Draft DCO [REP6-031]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
1.1	Archaeology	Schedule 3, Requirement 5 (Archaeology)	Please refer to Table 1, Item 1.1, of SCC's comments on the submissions received at Deadline 5 [REP6-167] , which sets out SCCAS's comments on the current wording of Requirement 5.
1.2	Landscape	Schedule 3, Requirement 9 (Reinstatement planting plan)	Paragraph (8): the off-site planting scheme needs to not only be submitted to but also approved by the relevant planning authority. Paragraph (9): the off-site planting delivery scheme needs to be also in accordance with the final LEMP(s) is so far as it needs to provide the same standards for implementation and aftercare.
1.3	Landscape	Schedule 3, Requirement 12 (Design of permanent buildings and link pillars)	SCC considers that paragraph (4) should include planting proposals to help integrate the link pillars into the landscape.
1.4	Skills, Education and Employment	Schedule 3, Requirement 15 (Employment and Skills Plan)	SCC notes that no substantive amendments have been made to Requirement 15 since SCC's comments on submissions received at Deadline 5 [REP6-167]. Therefore, SCC's position remains unchanged. SCC continues to support the principle of securing a Final Employment and Skills Plan ("ESP") through Requirement 15. However, SCC remains concerned that the Requirement, as currently drafted, does not provide sufficient certainty, control or enforceability to ensure that the ESP will operate as an effective mechanism for managing the Project's socio-economic impacts and delivering meaningful skills, employment and supply chain outcomes.

			In particular, SCC maintains that submission of the ESP alone is insufficient and that the Requirement should secure approval of the Final ESP by the relevant local authorities prior to commencement. Approval is necessary to ensure that the ESP is supported by a robust assessment of workforce and supply chain demand, contains clearly defined interventions, monitoring and reporting arrangements, and aligns with established governance structures, including the Regional Skills Coordination Function (“RSCF”). SCC also maintains its concerns regarding the use of the terms “substantially in accordance with” and “general accordance”. In the absence of greater detail within the Outline ESP, these terms introduce uncertainty as to how compliance will be assessed and risk allowing commitments to be diluted at the post-consent stage. For the reasons set out in SCC’s previous submissions, including the continued absence of clear linkages between workforce and supply chain demand and proposed interventions, the lack of defined targets and monitoring arrangements, and the deferral of key elements to the post-consent stage, SCC considers that Requirement 15 should be strengthened to require written approval of the ESP by the relevant local authorities before commencement and to provide greater certainty regarding compliance, monitoring and ongoing review.
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Table 2: 3.5 (E) Schedule of Changes to the Draft DCO [REP6-035]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
2.1	Legal	General	Appendix A details SCC's comments on [REP6-035].

Table 3: 6.11.A8 (A) Phase 2 Geophysical Survey [REP6-065]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
3.1	Archaeology	General Comment	SCCAS will contact the Applicant regarding the report's suitability for inclusion in the Suffolk Historic Environment Record. The report states that approximately 86% of the Phase 2 area has been subject to geophysical survey. The Applicant should state when the remaining areas will be surveyed or, where geophysical survey is not possible, explain how those areas will be archaeologically evaluated. SCCAS emphasises that the absence of magnetic anomalies should not be taken as evidence of an absence of archaeological remains. The geophysical survey interpretations, including any blank areas, must be 'ground-truthed' through trial trenching to inform a programme of archaeological mitigation for project impacts.

Table 4: 6.11.F4 (C) Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [REP6-069]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
4.1	Archaeology	General Comment	This plan identifies the areas that have undergone priority evaluation, including priority geophysical survey and trial trenching. It also shows those areas where Phase 2 geophysical survey has been undertaken. SCCAS welcomes the submission of this plan as part of the Examination. Document 6.11.A8 Environmental Statement Appendix 11.8 – Phase 2 Geophysical Survey [REP6-065] states that approximately 86% of the Phase 2 area has been subject to geophysical survey. Figures in 6.11.F4 Phase 1 and 2 Geophysical Survey Areas and Archaeological Trial Trenching Priority Areas [REP6-069] indicate the unsurveyed areas, the applicant should state when these remaining areas will be surveyed or, where survey is not possible, how they will be archaeologically evaluated.

Table 5: 7.2 (F) Outline Code of Construction Practice [REP6-073]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
5.1	Archaeology	Table 6.1 Mitigation measures / environmental commitments H01 – H06	SCCAS welcome the amendments made to the historic environment commitments H01 – H06. There are no further comments for the versions of these commitments in [REP6-073] .
5.2	Archaeology	Table 6.1 Mitigation measures / environmental commitments GH12 <i>"The provision of a drilling fluid breakout method statement, where horizontal directional drilling is proposed at trenchless locations, will be developed by the Main Works Contractor(s) and discussed with the Environment Agency, and will be informed by sufficient appropriate ground investigation and will include:</i> <i>Detailed and appropriate design of all trenchless crossings including demonstration of a suitable drilling profile and depth to mitigate the risk of breakout</i> <i>Description of drilling procedure and demonstration of suitability, including removal of borehole cuttings during drilling</i>	Following the Applicant's comments in Document 8.4.14, <i>Applicant's Comments on Any Further Information or Submissions Received at Deadline 5 [REP6-114]</i>, SCCAS notes that it is not seeking to establish a methodology within the OCoCP. SCCAS has therefore amended its request for an additional bullet point, which should serve as a signpost within commitment GH12 to the relevant methodological documents. SCCAS considers that Commitment GH12 should include, as a minimum, the following additional bullet point: <u>"Drilling clay breakout in areas where archaeological remains are to be preserved in situ will be managed in accordance with a methodology defined in the OAMS-QWSI and relevant DWSI."</u> This addition is requested to provide clarity for on-site engineers regarding the methodology to be followed when undertaking drilling clay breakout in archaeologically sensitive areas. It would also direct them to the documents setting out the appropriate methodology and any necessary remediation measures.

		• <i>Annular pressure monitoring</i> • <i>Regular walkovers of the drill path to check for visible evidence of breakouts</i> • <i>Measures to limit the volume of the drilling fluid loss</i> • <i>Measures to contain the lost drilling fluid</i> • <i>Measures to remove the lost drilling fluid</i> • <i>Measures to seal the area of the breakout</i> • <i>Measures to provide any remediation, if appropriate</i> • <i>Assessment of the pollution potential of any additives required and a permit or exclusion obtained as required.”</i>	SCCAS therefore maintains that this limited amendment would improve the clarity and usability of the commitment GH12 without creating any new or additional obligation for the Applicant.
5.3	Planning	Table 6.1 Mitigation measures / environmental commitments W23 <i>“Where construction works are undertaken in proximity to watercourses with high sensitivity to water quality changes, regular visual monitoring for signs of water pollution would be undertaken by the Environmental Clerk of Works (ECoW), in particular during periods of heavy rainfall. If signs of water pollution were detected the ECoW would use in-situ handheld devices to record key parameters and if pollution is confirmed,</i>	SCC (Planning) notes that the Environmental Clerk of Works is referred to by the abbreviation ECoW, however, the outline Landscape and Ecological Management Plan [REP6-085] states in its abbreviations section that the definition of ECoW is the Ecological Clerk of Works and uses EnvCoW to abbreviate the Environmental Clerk of Works. For consistency, SCC proposes that the abbreviation for the Environmental Clerk of Works in commitment W23 is amended to EnvCoW.

		<i>appropriate mitigation measures should be implemented to prevent further deterioration.”</i>	
5.4	Landscape	Table 6.1 Mitigation measures / environmental commitments GG34 <i>“The Project has committed to moving specific pylons and restricting the movement of specific pylons or infrastructure along the longitudinal Limits of Deviation (LoD):</i> <i>• RG13 - restrict southerly movement due to buried archaeology found as part of the solar development</i> <i>• RG48 to RG49 – ensure the alignment following detailed design minimises the extent of vegetation management required, e.g. through increased pylon heights. Also restrict width of access and commit to using trackway instead of a stone haul road through the woodland in the Tas Valley</i> <i>• RG86 - restrict movement to the south to prevent physical impact to non-designated heritage asset Bush Hall (1013)</i> <i>• RG87 - restrict movement to the west to prevent physical impact to non-</i>	SCC's requests for tighter parameters regarding LoD for specific pylon towers (as outlined in its Action Point 7 of ISH4 in SCC's Post-Hearing Submission [REP6-166]) are not reflected in this commitment.

		<i>designated heritage asset Bush Hall (1013)</i> • <i>RG164 and RG165 - restrict south west and north east movement to avoid impact to archaeological remains</i> • <i>RG181 to RG182 – maintain 30 m separation to the fishing lakes from blown out conductors [...]</i>	
5.5	Landscape	Table 6.1 Mitigation measures / environmental commitments LV03 <i>“Construction lighting will be directional and minimised. See B06 for additional details.”</i>	Additional wording as discussed in recent meetings will need to be included at D7.
5.6	Biodiversity	7.3 Ecology and Landscape Working Group	The wording provided by SCC, in regard to the formation of the Ecology and Landscape Working Group, at deadline 5 [REP5-270], provides additional detail. SCC sees no reason to deviate from this wording and therefore considers that that wording suggested in [REP5-270] should be included and secured in the oCoCP.

Table 6: 7.3 (E) Outline Construction Traffic Management Plan [REP6-083]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
6.1	Landscape	Accesses and Crossover Points, 5.8.15	SCC welcomes that this commitment for traffic management has been extended from mature trees to now also include mature hedgerows.
6.2	Highways	Enforcement, 6.4.1	SCC queries the three month look ahead for HGV movements and how exceedances can be forecast
6.3	Highways	HGV Deliveries, 5.4.19	SCC queries why “deliveries” has been removed from this paragraph

Table 7: 7.4 (F) Outline Landscape and Ecological Management Plan [REP6-085]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
7.1	Landscape	Executive Summary and 1.1.6	SCC welcomes the inclusion of pre-commencement works into the scope of the oLEMP but considers that therefore the final LEMPs need to be approved before the beginning of pre-commencement works.
7.2	Landscape	Working near Trees and 7.2.1	There remain many unidentified trees and hedges within Figure A13.6.1 – Landscape and Visual Arboricultural Impacts Plan [REP1-065] and 7.4 Errata Outline Landscape and Ecological Management Plan Appendix A – Arboricultural Impacts Plan Part 1 (Final Issue B) and Part 2 (Final Issue B) [REP4-176] and [REP4-177], and SCC considers that this needs to be addressed.
7.3	Landscape	Tree Protection Measures, 7.3.2	It is not sufficient to submit barrier types for approval, the locations, where the different barrier types will also need approved via a Tree Protection Plan differentiating the different types. The text needs to be amended to reflect this.
7.4	Landscape	Table 7.1 Mitigation hierarchy for veteran trees	SCC welcomes the Applicant's commitment to a compensation ratio of 30:1 for any removal of veteran trees and maintain and monitor compensation measures for 30 years.
7.5	Landscape	Small groups and individual trees – offsite planting	It should be secured in this oLEMP that the off-site planting will be provided in accordance with the final LEMP secured under through Requirement 9 of the draft DCO. Paragraph 9.3.7 SCC considers that the Offsite Planting Delivery Scheme will need to be submitted to the relevant LPAs for their approval rather than just for information.

7.6	Landscape	Natural Regeneration of Woodland	Paragraph 9.3.9 It remains unclear, how it will be decided, whether supplementary planting will be deemed necessary and who will decide this. Will this be within the remit of the Ecology and Landscape Working Group? There is also a lack of commitment regarding the delivery of any such supplementary planting. SCC considers that this needs to be carried out to the same standard as reinstatement planting within the order limits and accordance with the final LEMP(s).
7.7	Landscape	Woodland Planting Deer and Grey Squirrel Management	SCC re-iterates the urgent recommendation to provide deer <i>and rabbit</i> proof fencing for areas of natural regeneration.
7.8	Landscape	Land Around Wenham Grove CSE Compound – Landscape Proposals	There has been positive engagement between the Applicant and SCC with regards to the landscape proposals. SCC would welcome, if amended proposals, as discussed, could be submitted at Deadline 7, both within the main body of the oLEMP and in Appendix D.
7.9	Landscape	Landscape Compensation 9.7.29	In SCC's view the offsite provision of tree replacement does not constitute landscape compensation, as it lacks strategic co-ordination, which is why SCC considers the indicative Masterplans the Applicant provided at D5 [REP5-119] are necessary. The off-site tree planting is seen as compensatory planting, i.e. replacement planting for which new locations needed to be found, because it could not be planted in the location from where it was lost. However, its value could be greatly increased, if it was implemented as part of a compensatory landscape enhancement masterplan.
7.10	Landscape	Aftercare, General Aftercare	SCC re-iterates that for hedgerows, trees and woodland planting, five years' aftercare is insufficient, and that there need to be contingencies, which include time extensions, where plantings struggle to establish. Landowners should have a choice, after five years, whether they prefer to have the control over the land used for replacement planting handed back or whether they

			prefer to delay the handover until the replacement planting is sufficiently established (approximately a further five years of growth).
7.11	Landscape	Aftercare, Woodland, Trees and Hedgerows	Watering: SCC recommends the use of soil moisture monitoring equipment, which would trigger watering, when required and independently from other aftercare measures, as these may be too infrequent to be effective, i.e. the trees may be dead by the second aftercare visit.
7.12	Landscape	Appendix B - Ancient Woodland and Veteran Tree Strategy - Tracked Changes Version, Final Issue C, July 2026 [REP6-087]	No further comments.
7.13	Landscape	Appendix D - Outline Landscape Proposals - Tracked Changes Version, Final Issue C, July 2026 [REP6- 089]	This still only includes landscape proposals for one site rather than all sites. SCC proposes that this should be rectified, and the oLEMP main text (p.7) amended accordingly to include the right Revision reference for Appendix D.
7.14	Biodiveristy	Implementation 11.2	The wording provided by SCC in regard to the formation of the Ecology and Landscape Working Group, at deadline 5 [REP5-270] , provides additional detail. SCC sees no reason to deviate from this wording and therefore considers that that wording suggested in [REP5-270] should be included and secured in the oLEMP.

Table 8: 8.4.14 (A) Applicant's Comments on any Further Information or Submissions Received by Deadline 5 [REP6-114]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
8.1	Archaeology	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 3: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey) (Priority Areas) Results Report – Part 1 [REP4-128] <i>"The Applicant notes that SCCAS had already provided comments on this document, which were actioned and responded to at Deadline 4.</i> <i>The update requested in Table 3, item 3.1, will not be actioned as this asks for an ExQ1 response which addressed how geophysical survey results had been used to inform the assessment of archaeology in 6.11 Environmental Statement Chapter 11 – Historic Environment [Revision C] be incorporated in the technical geophysical survey report, the purpose of which is to present the results of the survey not to undertake the impact assessment.</i> <i>The comments regarding interpretation of the greyscale have been passed to the archaeological contractor and if relevant an updated version of the report will be shared directly with SCCAS."</i>	SCCAS notes this.
8.2	Archaeology	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 4: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey)	SCCAS notes this.

		(Priority Areas) Results Report – Part 2 [REP4-130] <i>“Noted. The Applicant will respond when SCCAS provide this information.”</i>	
8.3	Archaeology	Table 2.1 Applicant’s responses to Deadline 5 submissions ([REP5-270] Table 5: 6.11.A4 (C) ES Appendix 11.4 Geophysical Survey) (Priority Areas) Results Report - Part 3 [REP4-132] <i>“The Applicant confirms that this matter is addressed within the archaeological evaluation assessment reports, which include consideration of the relationship between geophysical survey results and the results of trial trenching.”</i>	SCCAS welcomes and notes this.
8.4	Archaeology	Table 2.1 Applicant’s responses to Deadline 5 submissions ([REP5-270] Table 7: 8.2 (B) Drainage Strategy DCO [REP4-187]) • While the Drainage Strategy Appendix B is not required to address archaeological impacts directly, it identifies locations where drainage infrastructure, temporary and permanent construction works, and potential changes to surface-water movement may occur. These elements have the potential to affect buried archaeological remains through ground disturbance and/or changes to preservation conditions. The OAMS-OWSI should therefore take account of the drainage and construction-related works identified in this document, to ensure that all areas of ground disturbance are subject to archaeological evaluation	SCCAS notes the Applicant’s response and is currently in discussion with the Applicant regarding the Phase 2 trial-trenching plans. The plans supplied to date do not appear to target all proposed impacts for trial trenching. SCCAS will continue to engage with the Applicant to agree an appropriate scope of archaeological evaluation.

		(geophysical survey and trial trenching) and mitigation where required. <i>“The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial trenching, as shown in the proposed trench plans provided directly to SCCAS on 3 June 2026.”</i>	
8.5	Archaeology	Appendix E, Table E.1 Applicant’s response to Table 9 of [REP5-270] ([REP4-298] 2.5) The Applicant acknowledges the, comments regarding the use of an Historic Environment Management Plan and the approach to preservation in situ. These matters have previously been considered and addressed in 8.4.11 Applicant’s Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], and through the updated 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]]. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in those submissions.	SCCAS notes the Applicant’s references to [REP5-192] and [REP5-161]. However, it remains unclear how currently unknown archaeological heritage assets which are discovered during evaluation, mitigation or construction, and subsequently determined by the applicant to be preserved in situ, would be protected from maintenance during operation or from decommissioning. The OCoCP is not an appropriate mechanism for securing this protection because it does not provide an enduring framework covering the full lifetime of the development. SCCAS therefore maintains that the Applicant should commit to preparing a Historic Environment Management Plan (“HEMP”), secured through and incorporated within the OAMS-OWSI. For example, if an Early Anglo-Saxon cemetery or Roman villa were identified and the scheme design amended to

			preserve it in situ, the HEMP would ensure that the Applicant retained an enduring record of its location and the extent. This would enable future maintenance works to avoid inadvertent impacts or, where avoidance is not possible, trigger appropriate consultation with the relevant Local Planning Authority Archaeological Advisor and archaeological mitigation. NB. SCCAS are not expecting National Grid to maintain heritage assets on land outside of their ownership and control. The purpose of the HEMP is to ensure that future maintenance and works do not impact these heritage assets.
8.6	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.7) The Applicant updated commitment GH11 of 7.2 Outline Code of Construction Practice [Revision F] at Deadline 5, which now commits that the Hydrogeological Risk Assessments will include sensitive archaeological deposits as receptors and also secures that the nature and scope of any mitigation for impacts will be agreed with appropriate stakeholders, including Historic England.	SCCAS notes the Applicants response and the confirmation that GH11 includes sensitive archaeological deposits. SCCAS considers that its previous concern has been addressed and has no further comment on this matter.
8.7	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.8) The Applicant acknowledges the comments regarding the inclusion of archaeological matters within the digital Environmental Management Plan.	SCCAS notes the Applicant's response and the confirmation that the digital Environmental Management Plan and associated Geographic Information System will identify archaeological mitigation areas.

		The Applicant has previously addressed this matter in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192] page 81 and 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] page 124. which confirms that the digital Environmental Management Plan and associated Geographic Information System will identify constraints and no-go areas, including ecological and archaeological mitigation areas. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in that submission.	
8.8	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.9) The Applicant confirms that the requested update has already been made to 7.2 Outline Code of Construction Practice [REP5-139].	SCCAS notes the Applicant's confirmation that Commitment H04 has been updated in the Outline Code of Construction Practice [REP5-139]. SCCAS considers that its previous concern has been addressed and has no further comment on this matter.
8.9	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] ExQ) The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5 192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be	SCCAS notes the Applicant's response. However, SCCAS's concerns regarding the provisions within the OAMS-OWSI have not been fully resolved. Further comments are set out in SCC Comments on Submissions Received at Deadline 5 [REP6-167].

		determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5161] includes provision for further geoarchaeological/palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete.	
8.10	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 2.12) The Applicant confirms that drainage ponds, including SUDS, have been included in the priority and phase 2 geophysical survey and priority trial trenching. The SUDS included in the design for the overhead line sections of the route are already proposed to be included in the phase 2 trial trenching, as shown in the proposed trench plans provided directly to SCCAS on 3 June 2026. An updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5161] was submitted at Deadline 5 in response to comments provided by SCCAS, Historic England and other LPA archaeological advisors. There were four priority evaluation sites in Suffolk and two of the assessment reports for these were submitted in January. The other two have subsequently been shared with SCCAS directly in June 2026. SCCAS and the Applicant met to discuss the priority mitigation areas on 11 June 2026.	SCCAS notes the Applicant's response and acknowledges that the remaining priority evaluation reports have now been provided directly to SCCAS. SCCAS also acknowledges that a meeting was held with the Applicant on 11th June 2026 to discuss the priority mitigation areas. Where SCCAS have asked for amendments to the applicants proposed priority mitigation areas and additional mitigation areas. SCCAS is also currently in discussion with the Applicant regarding the proposed Phase 2 trial trenching. SCCAS has provided separate comments on the updated Document 7.5, Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], in SCC Comments on Submissions Received at Deadline 5 [REP6-167].

8.11	Archaeology	Appendix E, Table E.1 Applicant’s response to Table 9 of [REP5-270] ([REP4-298] 3.3) In order to be registered on Natural England’s off-site Biodiversity Net Gain (BNG) register, a series of steps are undertaken which includes consideration of other environmental constraints such as archaeology. No specific commitments regarding off-site BNG locations and archaeology as part of this Development Consent Order are therefore necessary or possible. Works within the Order Limits would be subject to the programme of archaeological works secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], which already includes provision for environmental mitigation. The details of this would be set out in subsequent DWSIs.	SCCAS notes the Applicant’s clarification regarding the process for registering off-site biodiversity gain sites with Natural England and its confirmation that no specific off-site habitat creation, enhancement or management works are proposed or secured as part of this Development Consent Order. However, should any specific off-site habitat works subsequently be relied upon as project mitigation and secured through the DCO or an associated legal obligation, their archaeological implications should be appropriately assessed and addressed through the relevant consenting or delivery mechanism. SCCAS notes that document 8.28 Outline Offsite Planting Delivery Scheme [REP6-128] records the potential for offsite tree planting as mitigation. Any areas which will be subject to offsite tree planting should be archaeologically assessed through trial trenching where appropriate. The relevant local planning authority archaeological adviser should be consulted at an early stage to agree the scope of any assessment, evaluation and mitigation for any areas of land brought forward for this purpose. This should be reflected in the OAMS-OWSI. SCCAS also notes the Applicant’s confirmation that habitat creation and other environmental mitigation works within the Order Limits will be subject to the programme of archaeological works secured through
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			Document 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], with detailed measures to be set out in the relevant DWSIs. SCCAS considers that on-site habitat creation and environmental mitigation areas involving ground disturbance, or otherwise having the potential to affect archaeological remains, should be clearly identified and addressed in the relevant DWSIs. Subject to these matters being appropriately addressed, SCCAS has no further comment at this stage.
8.12	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.8) 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] already includes for trenchless crossings, at paragraph 4.6.13: "Where it is determined that preservation in situ is achievable, the Preservation In Situ Plan included in the DWSI will include provision and procedures for monitoring, reporting, emergency response, archaeological investigation and remediation measures in the event of slurry breakout, frac-out or other unexpected ground disturbance." As this is already committed to, and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] is secured through	SCCAS notes the applicant's comments and would like to assure the applicant that we are not seeking to establish a methodology within the OCoCP. SCCAS has therefore amended its request for an additional bullet point, which should serve as a signpost within commitment GH12 to the relevant methodological documents. SCCAS considers that Commitment GH12 should include, as a minimum, the following additional bullet point: <u>"Drilling clay breakout in areas where archaeological remains are to be preserved in situ will be managed in accordance with a methodology defined in the OAMS-OWSI and relevant DWSI."</u> This addition is requested to provide clarity for on-site engineers regarding the methodology to be followed

		Requirement 5 of 3.1 Draft DCO [REP5-060], the Applicant does not consider it is necessary to also update GH12.	when undertaking drilling clay breakout mitigation in archaeologically sensitive areas. It would also direct them to the documents setting out the appropriate methodology and any necessary remediation measures. SCCAS therefore maintains that this limited amendment would improve the clarity and usability of the commitment GH12 without creating any new or additional obligation for the Applicant.
8.13	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.10) The Applicant has previously addressed the archaeological implications of water vole displacement in 8.4.9 Applicant's Comments on any Further Information or Submissions Received by Deadline 3 [REP4-298] and 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], which clarify that displacement activities do not generally involve ground disturbance, and that any ground breaking works would be subject to the programme of archaeological works secured through 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161], which already includes provision for environmental mitigation, and subsequent DWSIs.	Noted

		The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in those submissions.	
8.14	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.11) The Applicant has previously addressed the archaeological implications of veteran trees in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192]. The Applicant does not have any further submissions to make on this matter at this time and maintains the position set out in that submission.	Noted
8.15	Archaeology	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.13) MOTTS – John Weeks As discussed in paragraph 4.8.72 of 6.4 Environmental Statement Chapter 4 - Project Description [APP-130] there are multiple methods of trenchless installation that could be used. The location and methodology for the trenchless crossing of the River Stour will be determined at detailed design following further investigation and detailed design; however, all potential options have been allowed for within the assessment. Refer to Appendix C of 6.9.A4 Environmental Statement Appendix 9.4 – Hydrogeological Risk Assessment [APP-185] for details on possible trenchless methodologies.	SCCAS notes that Appendix C of the Hydrogeological Risk Assessment [APP-185] describes the possible trenchless methodologies. Different trenchless crossing methodologies require very different archaeological mitigation strategies. Since the precise engineering methodologies have not been formalised the OAMS-OWSI should reflect that a range of archaeological mitigation may need to be applied. The Applicant's response does not define what, if any, additional studies have been undertaken to establish the feasibility of trenchless crossing.

8.16	Archaeology	[Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270] ([REP4-298] 3.15) The Applicant confirms that these matters are addressed in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and in 8.4.11 Applicant's Comments on any Further Information or Submissions Received by Deadline 4 [REP5-192], which state that the exact location of trenchless crossings and the techniques to be employed are not yet confirmed and will be determined at the detailed design stage. Consequently, 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] includes provision for further geoarchaeological/ palaeoenvironmental investigation and mitigation, to be determined once detailed design is complete. Regarding the Hydrogeological Risk Assessment commitment GH11 in 7.2 Outline Code of Construction Practice [REP5-139] includes assessment for archaeological deposits. It is the Applicant's view that 7.2 Outline Code of Construction Practice [REP5-139], 7.4 Outline Landscape and Ecological Management Plan [REP5-157] and 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] complement each other and do not contain contradictions.	SCCAS notes the Applicant's confirmation that the OAMS-OWSI [REP5-161] provides for further geoarchaeological and palaeoenvironmental investigation and mitigation once the detailed crossing design and methodology are known. The OAMS-OWSI is still not approved and SCCAS have provided further comments on the OAMS-OWSI in SCC Comments on Submissions Received at Deadline 5 [REP6-167]. SCCAS also welcomes the confirmation that the Hydrogeological Risk Assessment secured by commitment GH11 will include archaeological deposits.
8.17	Skills, Education	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 12: 8.16 (A) Health and	SCC notes the Applicant's conclusion that the 2025 Index of Multiple Deprivation ("IMD") data does not

	and Employment	Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.1 Health and Wellbeing) <i>“The scope of the Technical Note was not intended to address cumulative or overlapping pressures, but simply to present findings from a comparative assessment of 2019 and 2025 Index of Multiple Deprivation (IMD) data, including a focus on localised deprivation as set out in the ExA’s Rule 17 Letter [PD-019]. The Applicant considers the Technical Note fulfils this scope.</i> <i>An assessment of cumulative effects, which include cumulative effects on health and wellbeing, has been completed for the Project and covers how combined pressures may interact. The findings from this assessment are presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] and 6.17.1 Environmental Statement Chapter 17 - Cumulative Effects - Response Update [REP4-163]. 8.16 Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] concludes that the overall pattern of deprivation along the Project has remained broadly consistent between 2019 and 2025. Although there may be relative increases in deprivation in parts of Braintree and Mid Suffolk, which may highlight greater vulnerability among local populations, the Technical Note also notes that changes in IMD rankings are largely a function of methodological adjustments and boundary revisions rather than dramatic shifts in underlying living conditions. The revised data does not materially alter</i>	materially alter the findings of the socio-economic assessment. SCC does not dispute that overall deprivation patterns across the study area remain broadly consistent. However, SCC notes that the updated data identifies changes in relative deprivation within a number of authorities and across specific domains, including employment and education, skills and training. SCC's concern is not limited to whether overall deprivation rankings have changed, but whether changes within those domains have implications for labour market capacity, workforce availability and the ability of local communities to access Project-related employment and skills opportunities, particularly when considered alongside the cumulative demands arising from other NSIPs in the region. Whilst the Technical Note concludes that the updated IMD data does not materially alter the assessment findings, it does not provide any further analysis of these potential labour market implications. SCC therefore maintains its previously stated position that a more robust understanding of workforce demand, skills requirements and cumulative labour market pressures is required through the Employment and Skills Plan process, supported by detailed workforce evidence and coordination through the Regional Skills Coordination Function. This matter is not resolved by the IMD analysis presented within the Technical Note.
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		<i>the sensitivity or assessment outcomes presented in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B].</i> <i>Good practice measures already identified in 6.10 Environmental Statement Chapter 10 – Health and Wellbeing [Revision B] and associated documents such as 7.2 Outline Code of Construction Practice [Revision F] are considered sufficient to address potential impacts identified, which are not significant (for example include preparation of a detailed communication strategy to inform communities of construction activities and the preparation of a detailed complaints procedure)."</i>	
8.18	Skills, Education and Employment	Table 2.1 Applicant's responses to Deadline 5 submissions ([REP5-270] Table 12: 8.16 (A) Health and Wellbeing and Socio-economics, Recreation and Tourism Technical Note [REP4-317] Table Item 12.2 Skills) <i>"The scope of the Technical Note is limited to the scope set out in the ExA's Rule 17 Letter [PD-019] (i.e. comparison of 2019 and 2025 IMD data and changes in localised deprivation over time) and therefore does not address issues relating to labour market capacity, skills availability, or cumulative workforce pressures arising from the Project.</i> <i>The Applicant recognises the importance of skills development and workforce planning and has already given detailed consideration to the scale and nature of employment likely to arise from the Project. Due to the characteristics of the works, the maximum peak on-site</i>	SCC acknowledges the Applicant's clarification that the purpose of the Technical Note was to respond to the Examining Authority's request regarding changes in Index of Multiple Deprivation data and localised deprivation. SCC agrees that the Technical Note was not intended to provide a detailed assessment of labour market capacity, skills availability or cumulative workforce demand. However, SCC notes that the Applicant has relied on the response to conclude that workforce demand associated with the Project is modest in scale and not significant and references the Outline Employment and Skills Plan ("OESP") as the mechanism through which workforce, skills and supply chain matters will be addressed. SCC's concern is not solely the scale of

		<i>construction workforce attributable to local labour is anticipated to be approximately 172 Full Time Equivalent (FTE) roles, with a total local job demand of approximately 480 roles across the four year construction period. This level of employment is modest in scale and is not considered significant when compared with employment demand in other sectors.</i> <i>The Applicant submitted 8.13 Outline Employment and Skills Plan [REP5 215] (OESP) at Deadline 5. This provides a clear and structured framework to support local workforce development, skills enhancement and engagement with local businesses, and will be refined as part of the Project's delivery. The OESP includes an overview of employment and skills profile data for the local population and is intended to provide transparency and clarity regarding the approach that the Applicant and its delivery partner, The Great Grid Partnership, will take to employment, skills, training and supply chain engagement during construction of the Project. The OESP was developed in collaboration with host authorities including Suffolk County Council; the Applicant is committed to ongoing engagement with stakeholders during the preparation and delivery of the Final Employment and Skills Plan."</i>	workforce demand in isolation, but whether sufficient evidence has been provided to understand how workforce demand, skills requirements and supply chain needs will interact with local labour market conditions and cumulative demand arising from other major infrastructure projects across the region. As set out in SCC's previous submissions, the OESP does not currently provide a sufficiently detailed evidence base regarding workforce demand, skills requirements, supply chain implications, monitoring arrangements or cumulative impacts. SCC therefore maintains its position that further evidence and coordination, including through the Regional Skills Coordination Function ("RSCF"), are required to provide confidence that workforce and skills impacts have been fully understood and can be effectively managed through the Final Employment and Skills Plan.
8.19	Skills, Education and Employment	Appendix E, Table E.1 Applicant's response to Table 9 of [REP5-270], 5.1, 3.16.8) <i>"The Applicant acknowledges Suffolk County Council's comments. 8.13 Outline Employment and Skills Plan [REP5-</i>	SCC acknowledges the Applicant's response but does not consider that it addresses the substantive concerns previously raised.

	<i>215] (OESP) is an outline, non-statutory document which establishes a framework for the delivery of employment, skills and supply chain outcomes. The assessment of workforce demand and associated impacts has been undertaken for the Project and is reported within 6.15 Environmental Statement Chapter 15 – Socio-economics, Recreation and Tourism [Revision B], including consideration of construction employment, labour market effects and associated socio-economic impacts. This includes an assessment of likely workforce requirements and their interaction with local labour markets at a proportionate level for the application stage.</i> <i>Further detail on workforce profiling, including phase-specific labour demand, skills requirements and delivery arrangements, will be developed through the Final ESP, informed by detailed design, construction programming and contractor input.</i> <i>The OESP recognises the importance of regional coordination mechanisms, including the Regional Skills Coordination Function (RSCF), in supporting alignment of skills provision and workforce development across the Eastern region. The OESP establishes a framework for engagement with relevant stakeholders and does not seek to duplicate or replicate existing regional coordination structures. The Applicant will engage with appropriate regional and local mechanisms, including the RSCF where relevant, to support coordination of employment and skills activity.</i>	While SCC recognises that the OESP is an outline document, the Applicant's response continues to rely on the future development of key elements of workforce planning, skills delivery, supply chain engagement, governance arrangements, targets and monitoring frameworks through the Final ESP. SCC's concern is not that the OESP is an outline document in principle, but that the current level of detail and evidence does not provide sufficient confidence that workforce demand, skills requirements and cumulative labour market impacts have been properly understood and can be effectively managed. SCC notes the Applicant's position that workforce impacts have been assessed at a proportionate level within the Environmental Statement. However, SCC maintains that the absence of detailed workforce profiling, phase-specific labour demand assumptions and supply chain workforce requirements limits the ability to understand how demand will arise over time and interact with existing labour market constraints and other major infrastructure projects across the region. These matters are particularly important given the concentration of NSIPs within Suffolk and the wider Eastern region. SCC also notes the Applicant's commitment to engage with appropriate regional and local mechanisms, including the Regional Skills Coordination Function (RSCF) "where relevant". However, SCC's concern
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		<i>Further detail on how this engagement will be taken forward in practice, including the role of relevant stakeholders and coordination arrangements, will be developed through the Final ESP, in collaboration with partners and informed by the construction programme and contractor input.</i> <i>The OESP sets out measures to maximise beneficial outcomes and support skills development. The approach set out within the OESP will be developed further through the Final ESP, which will include proportionate detail on delivery arrangements, including the identification of appropriate targets, responsibilities and monitoring frameworks, informed by detailed design, the construction programme and contractor input.”</i>	remains that the Applicant has not committed clearly to working through the RSCF as the established mechanism for coordinating labour demand, aligning skills provision and managing cumulative workforce pressures. The proposed approach remains focused on future engagement arrangements to be determined post-consent, rather than establishing a clear framework for coordination at this stage. Similarly, while SCC welcomes the Applicant's intention for the Final ESP to include targets, responsibilities and monitoring frameworks, these matters continue to be deferred to the post-consent stage. Until such measures are defined, SCC remains concerned that it is not possible to determine whether the proposed approach will be proportionate, deliverable or sufficient to address workforce, skills and supply chain needs, or whether meaningful outcomes can be secured through the DCO. SCC maintains its position that the OESP should provide a stronger evidence base in relation to workforce demand, skills requirements, supply chain implications, governance and cumulative impacts, together with clearer commitments regarding engagement through the RSCF, monitoring arrangements and delivery outcomes, to ensure that the Final ESP can function as an effective mechanism for managing socio-economic impacts and maximising local employment and skills benefits.
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Table 9: 8.4.15 (A) Applicant's Comments on Responses to ExQ2 [REP6-115]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
9.1	Archaeology	HE 2.13 <i>"The Applicant acknowledges the comments regarding the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation.</i> <i>Comments from SCC were received in advance of Deadline 5 and were addressed in the updated version of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] submitted at Deadline 5."</i>	SCC Archaeological Service welcomes the amendments made to the Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. However, a number of matters remain unresolved, and SCC Archaeological Service does not agree with all aspects of the revised document. Further comments identifying the outstanding matters have therefore been provided to the Applicant and submitted to the Examination at Deadline 6 in SCC comments on submissions received at Deadline 5 [REP6-167].
9.2	Health and Wellbeing	HW 2.1 , Communication Strategy	Public Health welcomes the additional commitments now included within Appendix E of the Outline Code of Construction Practice [REP6-079] regarding complaint logging, investigation, escalation routes, response times and the regular review of complaints data to identify recurring issues by location or topic. It is suggested that the frequency of complaints reviews (referred to in paragraph 2.1.2, bullet point 6) should be specified, for example through a commitment to undertake reviews on a monthly basis. Whilst Public Health welcomes the additional complaints management arrangements, we continue to consider that a broader health and wellbeing monitoring process is required, consistent with our previous submissions

			including [RR-3520] and in response to Examining Authority question HW 2.1 of [REP5-271] .
9.3	Health and Wellbeing	DCO 2.S10, Schedules 3, Requirement 7 (Construction Hours)	Public Health maintain our position as set out [REP5-270] .

Table 10: 8.5.11 (A) Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 3 [REP6-117]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
10.1	Archaeology	Requirement 5 (Archaeology) Oral Summary of the Applicant's Case The Applicant did not speak first and only responded to matters raised by IPs (see below). Applicant's Comments on Matters Raised by IPs In response to SCC, who have requested that pre-commencement works are the subject of prior evaluation or investigation through a requirement, as proposed in the Sea Link DCO, the Applicant maintains that a blanket requirement, where risk to archaeology is not consistent across the board, is neither reasonable nor proportionate. As presently drafted, any breaking of ground, however minor, which would include putting a single fence post in	SCCAS disagrees with the Applicant's comments that this project can be distinguished from the Sea Link project as regards the need to safeguard archaeology. The archaeological process is the same for both projects: evaluation establishes the archaeological potential and significance of the affected area and informs mitigation proportionate to the development impacts. Project-specific differences may affect the extent and form of evaluation and mitigation required, but they do not alter this fundamental process. The purpose is not to impose a blanket restriction on the development, but to ensure that intrusive pre-commencement works are informed by the results of appropriate archaeological evaluation, including trial trenching, and that proportionate mitigation is developed and implemented in response to the identified archaeological significance and development impacts. The breadth of pre-commencement operations as defined by Article 2(1) includes several which may involve intrusive works below current ground level and the interaction of the definition of 'commence' and Requirement 5 means that all of these operations are excluded from the need for prior archaeological evaluation. The Applicant's response does not address the breadth of this exclusion but rather focuses on the example of 'a single fence post'. However, even such a fence post (albeit in reality it is artificial to contemplate a 'single' fence post in isolation from other posts) could have damaging effects on near-surface archaeology. The Outline Archaeological Mitigation

	for preliminary enclosure work, would be caught by this requirement. The Applicant notes that Historic England has confirmed it is satisfied with both the revised Requirement 5 drafting and the revised 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. A blanket prohibition must only be included if it can be justified on the facts. The Applicant's position is that Sea Link is different, it is geographically separate from Norwich to Tilbury and has specifically different archaeological potential to Norwich to Tilbury, including the shoreline which was referred to in that project's hearings. Norwich to Tilbury has a very different profile in respect of the scale and the delivery programme. The position faced by the Sea Link project in respect of archaeology is very different to the position faced by the Norwich to Tilbury Project and, therefore, it is neither appropriate nor proportionate in this case to apply a blanket	Strategy and OWSI [REP5-161] recognises (at para 4.1.2) that the pre-commencement operations at all temporary construction sites could include fencing and gated entrances which are adequate to secure the site. Site clearance is also a pre-commencement operation, and [REP5-161] indicates that this will include soil stripping within construction sites. The OAMS-OWSI establishes the overarching methodology and process for archaeological work following consent, while a DWSI would define the scope and detailed methodology for the relevant archaeological works. However, because of the 'carve out' for all pre-commencement operations, the current wording of Requirement 5 does not prevent intrusive pre-commencement works from commencing before the archaeological trial trenching and/or any necessary mitigation specified in the relevant DWSI have been completed. Intrusive pre-commencement works have the potential to damage or destroy currently unknown archaeological heritage assets that would otherwise be identified through evaluation. Archaeological monitoring and recording is appropriate only for small-scale construction impacts where other forms of archaeological mitigation cannot practicably be undertaken. Low archaeological potential does not, in itself, provide sufficient justification for adopting this methodology. Furthermore, although the Applicant states that written schemes of investigation would be agreed for these activities, the current wording of Requirement 5 does not secure the preparation, approval and implementation of a DWSI for archaeological works associated with intrusive pre-commencement works. Consequently, even if monitoring and recording were accepted as appropriate mitigation for a particular element of intrusive pre-commencement work, the Requirement would not ensure that the
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	restriction on pre-commencement works that involve breaking ground. Post Hearing Update A blanket prohibition must only be included if it can be justified on the facts. As noted above, the Applicant's position is that Sea Link is different, it is geographically separate from Norwich to Tilbury and has specifically different archaeological potential, including the shoreline which was referred to in that project's hearings, its scale and the delivery programme. The current system set out in the revised 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] submitted at Deadline 5 means that: Pre-commencement activities with potential to result in impacts to archaeology are already included in the scope of archaeological evaluation, which has either been completed or is planned, with mitigation determined where relevant following evaluation. Requirement 5 therefore ensures that appropriate archaeological protections	relevant DWSI had been approved and the archaeological measures implemented before that pre-commencement work commenced. SCCAS therefore maintains that Requirement 5 should be amended to include intrusive pre-commencement works and to ensure that such works do not commence until the relevant DWSI has been approved and the archaeological evaluation and any necessary mitigation required by that DWSI have been undertaken at the appropriate stage.
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		are in place for pre-commencement works that may be reasonably expected to impact archaeology and no further amendment to the wording is necessary. In addition, certain pre-commencement works (those with a small, defined construction impact where potential for archaeological remains is low) could be mitigated through archaeological monitoring and recording, which would ensure the works would be undertaken under the supervision of an archaeologist who has the right and the ability to stop the works if archaeology is found during any intrusive activities (see paragraphs 5.3.152 to 5.3.149 of 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]). Written schemes of investigation would be agreed for these activities as set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161]. The Applicant's position remains that, given its extensive trial trenching and	
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		the protections set out in 7.5 Outline Archaeological Mitigation Strategy and Outline Written Scheme of Investigation [REP5-161] and Requirement 5, insufficient justification has been provided to warrant a blanket restriction on pre-commencement operations that involve breaking ground.	
10.2	Health and Wellbeing	Requirement 7 (Construction hours)	SCC (Public Health) acknowledges the additional information provided by the Applicant regarding programme delivery. However, the Applicant has not explained the apparent criticality of the extended hours sought to the delivery of a programme for the project, in the context that the Applicant has acknowledged (in its response to ExQ2 DCO2.S10 in [REP5-211]) that <i>“At the pre-consent stage, the final construction working hours to be approved through the DCO are not fixed. As a result, it is not appropriate to embed extended hours or weekend working assumptions into the programme... The programme is therefore developed by working back from the required delivery date, taking into account typical levels of construction productivity rather than assuming that all available hours are fully productive... Taking account of the above for the purposes of modelling, contractor programmes are typically structured around standard calendar assumptions (five-day working week, 09:00-17:00), with detailed crew shift patterns not explicitly modelled.”</i> Notwithstanding that the Applicant has recently sought to ‘walk away’ from that very clear explanation (which it now claims at para 1.4.1 of [REP6-117] <i>“may have unintentionally created a misleading impression”</i>), the Applicant has not presented evidence to demonstrate by reference to any modelled work programme that it needs the extended construction hours in order to achieve any specific programme delivery date. It remains the case, on the evidence, that the only justification provided for the extended construction

			hours is (a) to allow for some (not all) specialist activities which are delivered on a 12 day shift pattern, and (b) to allow flexibility to make up time for unforeseen delays or other contingencies. Even these justifications have not been demonstrated by reference to any actual programme. Whilst the Applicant now identifies the potential for a delay in Paragraph 1.5.3 of [REP6-117] of approximately 6 to 12 months should Sunday working be restricted, this estimate is presented as a broad range and is acknowledged to depend upon a range of assumptions relating to workforce availability, contractor mobilisation, seasonal conditions, productivity, outage requirements and third-party access windows. The evidence therefore demonstrates at best no more than the possibility of delay rather than providing certainty regarding either the scale or inevitability of delay. The Applicant's case appears to place significant weight on maintaining maximum programme flexibility, but comparatively less weight on the potential benefits to communities arising from greater certainty of respite during the construction period. Public Health does not agree that the absence of significant adverse effects, as indicated in Paragraph 1.3.2, demonstrates that additional controls on construction hours would provide no benefit. The issue is not simply whether the proposed hours would result in unacceptable effects, but whether a reasonable and proportionate requirement could further reduce opportunities for disturbance and enhance community wellbeing. Restricting construction activity during Sundays and other sensitive periods would be expected to reduce the likelihood of disturbance at times when residents would reasonably expect greater opportunity for rest, recovery, family life and recreational activity. SCC has acknowledged that the restrictions it seeks could be subject to permitted departures if a justified case was made (e.g. to make up time lost due to adverse weather or unexpected events) and with effective project management and forward planning there is no reason why such a process need add delay to the programme.
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			Disruption to sleep is a key example through which health may be impacted. Irregular or prolonged noise exposure, especially during early mornings or evenings, can reduce both sleep duration and qualityⁱ. This may lead not only to physical fatigue, but also to impaired cognitive function, reduced concentration, and decreased productivity. In addition, ongoing disturbance with limited opportunity for respite can result in chronic stressⁱⁱ, particularly where residents perceive a lack of control or predictability within their environment. Whilst the magnitude of these effects will vary between individuals, it is reasonable to conclude that reducing the periods during which construction activity may occur is likely to reduce the frequency and likelihood of disturbance being experienced. Public Health also notes the Applicant's position that restricting Sunday working may prolong the overall construction programme and therefore extend the period during which communities experience a construction presence. However, duration and intensity of exposure are distinct considerations. A longer programme does not necessarily result in a greater health burden if affected communities benefit from regular and predictable respite from construction activity. The provision of routine periods free from construction disturbance can represent a meaningful mitigation measure in its own right and may help reduce cumulative stress and perceptions of prolonged disruption, particularly across a project of this scale and duration. Public Health notes the Applicant's references to the Yorkshire GREEN examination and the conclusions reached by the Examining Authority in that case regarding construction working hours. Whilst useful as a comparator, Public Health considers that limited weight should be attached to direct comparisons between the two projects without consideration of local context. In particular, the Applicant's submission does not adequately account for the exceptional concentration of NSIPs that are consented, under construction, or currently progressing through the DCO process across
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			Suffolk and the wider East Anglia region. In this context, the value of predictable periods of respite may be greater than in areas where communities are exposed to fewer concurrent or sequential infrastructure projects. Whilst Public Health recognises that certain specialist activities may legitimately require extended or continuous working arrangements for technical, safety or operational reasons, this does not however justify unrestricted project wide flexibility as the default position. The Applicant's submission identifies a number of specialist activities including foundation construction, tower assembly and erection, conductor installation (stringing), horizontal directional drilling, cable installation and cable jointing which may require continuity of operations or extended working periods in specific circumstances. Public Health accepts that there may be circumstances where such activities cannot reasonably be constrained to standard working patterns without creating engineering, safety or programme risks. However, these examples do not necessarily demonstrate that unrestricted Sunday and Bank Holiday working is required across the project as a whole, nor that all construction activities will require the same degree of flexibility. Rather, they demonstrate the need for a mechanism to consider exceptions where there is a clear and evidenced justification. In Public Health's view, a more proportionate approach would be to seek LPA approval for working outside the standard construction hours where specific activities, programme constraints, engineering requirements or safety considerations can be demonstrated. Such an approach would not prevent the delivery of activities that genuinely require extended or continuous working arrangements, but would ensure that departures from standard hours are justified on a case-by-case basis and subject to appropriate consideration of local circumstances and potential impacts on nearby communities.
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			Public Health therefore continues to support the approach detailed by Essex County Council as set out in [REP5-271] in ExQ2 DCO 2.S10.
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Table 11: 8.5.12 (A) Applicant's Written Summary of Oral Submissions and Response to Action Points for Issue Specific Hearing 4 [REP6-118]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
11.1	Planning	Table 2.1 Item 5 (Landscape and Visual Effects) 5.1a (Compensation and the mitigation hierarchy) Oral Summary of the Applicant's Case The Applicant retains its position that there is no requirement in law or policy for landscape harm necessarily to be offset or compensated. It has considered the extent of the mitigation which it has provided which includes the use of the Holford and Horlock rules, embedded mitigation where necessary and the potential for screening or softening. It has considered whether compensation or offsetting landscape harm is a necessary policy requirement or could legitimately reduce the residual visual impact of the proposal. It has concluded that there is no necessary policy requirement and that offsite	SCC disagrees with the Applicant's assessment that landscape compensation and offsetting measures are not necessary. SCC responded to the point concerning necessity of landscape compensation and offsetting under 5.1.a of SCC's Post-Hearing Submission for ISH3/4 [REP6-166]. The Council does not consider that the Applicant has adequately engaged with those representations.

		offsetting is not justified, necessary or proportionate. [...]	
11.2	Planning	Annex A (Schedule 20 Landscape Compensation Offsetting and Enhancement in relation to Specific Locations)	SCC has had discussions with the Applicant since Deadline 6. Further comments on proposed Schedule 20 are included in SCC's response to Question 6.2 of the ExA's Rule 17 Letter (dated 14 July 2026) submitted at this deadline.

Table 12: 8.30 (A) Response to Rule 17 Letter received 30 June 2026 [REP6-132]			
Table Item	Service Area and/or Topic	Referenced Paragraph or Item	SCC's Comments
12.1	Skills, Education and Employment	Employment and Skills Plan 2b	SCC notes the Applicant's position that the Employment and Skills Plan (“ESP”) is a benefit-led document rather than a mitigation measure and therefore does not require approval through Requirement 15. However, SCC does not agree that this distinction removes the need for an approval mechanism. Whilst the Outline Employment and Skills Plan (“OESP”) seeks to maximise employment, skills and supply chain opportunities, SCC's position throughout the Examination has been that workforce demand associated with major infrastructure projects can also give rise to adverse socio-economic effects, particularly in the context of existing skills shortages, labour market constraints and the concentration of NSIPs across Suffolk and the wider region. These include risks associated with labour displacement, competition for skills and supply chain capacity, wage inflation and cumulative labour market pressures. As such, the ESP is relevant not only to the delivery of benefits but also to the understanding and management of workforce and supply chain effects arising from the Project. SCC does not dispute that NPS EN-1 provides flexibility regarding the manner in which employment and skills measures may be secured. However, the proposed Requirement does not provide sufficient certainty and accountability given the Applicant's reliance on the Final ESP to define key workforce, skills, supply chain, governance and monitoring arrangements that are not currently established within the OESP. In SCC's view, where significant elements of the delivery framework are deferred to a post-consent

		stage, approval of the Final ESP by the relevant local authorities is necessary to ensure that the commitments secured through Requirement 15 are translated into a proportionate, evidence-led and deliverable programme. SCC also does not agree that requiring approval would improperly treat the ESP as a mitigation document. Rather, approval would provide an appropriate mechanism to ensure that the Final ESP is consistent with the OESP, supported by an adequate evidence base, aligned with the Regional Skills Coordination Function (“RSCF”) and other relevant governance arrangements, and contains clear targets, monitoring and reporting mechanisms. This is particularly important given SCC's continuing concerns regarding the absence of detailed workforce profiling, defined interventions and measurable outcomes within the current OESP. SCC maintains its position that Requirement 15 should require approval of the Final ESP by the relevant local authorities prior to commencement. This would not be disproportionate, nor would it conflate benefits with mitigation. Instead, it would provide the necessary confidence that the ESP can function as a credible, accountable and effective mechanism for managing workforce, skills and supply chain outcomes throughout the construction phase of the Project.
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1. ⁱ Cheuk N. Effects of building construction noise on residents: a quasi-experiment. *J Environ Psychol.* 2000;20(4):375-385.
 2. ⁱⁱ Arregi A, Vegas O, Lertxundi A, et al. Road traffic noise exposure and its impact on health: evidence from animal and human studies - chronic stress, inflammation, and oxidative stress as key components of the complex downstream pathway underlying noise-induced non-auditory health effects. *Environ Sci Pollut Res Int.* 2024;31:46820–46839.

NORWICH TO TILBURY

EN020027

APPENDIX A

Comments on Schedule of Change to the Draft DCO [REP6-035]

Comments on Submissions received at Deadline 6

Suffolk County Council 

1 Comments on Schedule of Changes to the Draft DCO [REP6-035]

Background

- 1.1 Table 2.5 (Schedule of Changes to Version E of the draft DCO [REP5-060]) of the Applicant's deadline 6 document *Schedule of Changes to the Draft DCO* [REP6-035] sets out the main changes made by the Applicant to the draft DCO and which are included in deadline 6 draft DCO [REP6-031]. SCC would comment on the following changes which concern the DESNZ unit, the "white land", the removal of human remains (art. 23), trees, and BNG –

DESNZ unit

- 1.2 Rows 5, 11, 44, 54, 57 and 72 of Table 2.5 concern the proposed DESNZ unit.
- 1.3 SCC's position in respect of how the DESNZ unit should operate is set out in its response to agenda item 5.2.b (Schedule 4 (discharge of requirements)) of its *Written Summary of Representations made at Issue Specific Hearing 3 ("ISH3")* [REP6-166] (page 13 of 37 to page 15 of 37). SCC's proposed article, which would enable the Secretary of State to call in any application to discharge a requirement, is set out in the reply to Action Point 9 (pages 16 to 18 of 37 of the same document). SCC maintains its position in respect of the DESNZ unit.
- 1.4 Notwithstanding SCC's opposition to an applicant being able to choose to whom an applicant for a discharge of a requirement should be made, in sub-paragraph (a), after "the undertaker's discretion" the word "to" is needed.

"White land"

- 1.5 Rows 9 and 15 of Table 2.5 concern the "white land".
- 1.6 On 24 June 2026, SCC provided details to the Applicant of the work it has undertaken comparing differing approaches across different DCOs regarding to the drafting of "Order land".
- 1.7 While the drafting suggested in rows 9 and 15 is novel and, so far as SCC is aware, unprecedented in DCOs, SCC considers the drafting works.

Removal of human remains (article 23)

- 1.8 The addition of the text after article 23(13)(c) (as set out in row 27 of Table 2.5) is an improvement on the previous drafting; however, the drafting cross-refers to the written scheme of investigation approved under requirement 5 (archaeology).
- 1.9 SCC maintains its concerns in respect of that requirement, as most recently set out at agenda item 5.2.a.i of its *Written Summary of Representations made at Issue Specific Hearing 3 ("ISH3")* [REP6-166] (page 9 to 12 of 37).

Trees

- 1.10 Rows 42 and 43 of Table 2.5 concern the amendments made to articles 50 (felling or lopping) and 51 (trees subject to tree preservation orders). SCC welcomes these amendments; however, these do not go far enough.
- 1.11 SCC raised wider points regarding article 50 in its *Comments on Submissions received at Deadline 3 [REP4-335]* (paragraph 2.3: page 10 of 100) and its *Post-hearing submission for Issue Specific Hearing 2 [REP4-336]* (page 15 of 43). SCC maintains its position as set out in those documents.

Reinstatement planting plan

- 1.12 Row 59 of Table 2.5 concerns the amendments made to requirement 9 (reinstatement planting plan).
- 1.13 In new sub-paragraph (10)(a) additional provisions are required to state that trees will be replaced (i) on a like for like basis at a ratio of 3:1 (i.e. three replacement trees for each tree lost) or (ii) with locally appropriate species in accordance with the recommendations of a Suitably Qualified Arboriculturist and Ecologist who has determined that like for like replacement would be inappropriate in that specific case.
- 1.14 In addition, Requirement 9 should include provision for periodic reporting to the local planning authority. Outside of the requirements, a mechanism needs to set out how the local planning authority's costs of monitoring the replanting regime will be paid.

Biodiversity net gain

- 1.15 Row 61 of Table 2.5 concerns the amendments made to requirement 11 (biodiversity net gain).
- 1.16 Paragraph 1(1) includes definitions of the following terms: “biodiversity metric”, “biodiversity offsetting scheme”, “final biodiversity net gain assessment” and “interim biodiversity net gain assessment”. Since these terms are used in Requirement 9 only, SCC would suggest the terms are relocated to Requirement 9 and are set out under current sub-paragraph (5).
- 1.17 In addition, SCC considers the definition of “biodiversity metric” should be amended as follows –
- “means version 4.0 of the statutory biodiversity accounting tool published by the Department for the Environment, Food and Rural Affairs or Natural England that can be used to measure the biodiversity value or relative biodiversity value of habitat or habitat enhancement for the purposes of biodiversity net gain **(or such other biodiversity metric approved by the relevant planning authority in consultation with the relevant statutory nature conservation body)**;

- 1.18 The additional words are included in the BNG requirements of several recently made DCOs and SCC consider it would be helpful if the words were included here also. Examples of recently made DCOs which include these words are: One Earth Solar Farm Order 2026 (requirement 9(2), (biodiversity net gain)); Dean Moor Solar Farm Order 2026 (SI 2026/754) (requirement 7(2), (landscape and ecological management plan)) and Fenwick Solar Farm Order 2026 (SI 2026/151) (requirement 8(2) (biodiversity net gain)).
- 1.19 In addition, Requirement 11 should include provision for periodic reporting to the local planning authority. Outside of the requirements, a mechanism needs to set out how the local planning authority's costs of monitoring BNG will be paid.