Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Suffolk Water Recycling Transfer and Storage

Case Reference: WA0210003

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

13 October 2026

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APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

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1. INTRODUCTION

1.0.1 On 03 September 2026, the Planning Inspectorate (the Inspectorate) received an application for a scoping opinion from Essex and Suffolk Water (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Suffolk Water Recycling, Transfer and Storage (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.

1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a scoping report, available from:

WA0210003 Suffolk WRTS scoping report

1.0.3 This document is the scoping opinion (the opinion) adopted by the Inspectorate on behalf of the SoS. This opinion is made on the basis of the information provided in the scoping report, reflecting the proposed development as currently described by the applicant. This opinion should be read in conjunction with the applicant's scoping report.

1.0.4 The Inspectorate has set out in the following sections of this opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the scoping report. The Inspectorate is content that the receipt of this scoping opinion should not prevent the applicant from subsequently agreeing with the relevant statutory bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

1.0.5 Before adopting this opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this opinion.

1.0.6 The Inspectorate has published a series of advice pages, including 'Pre-application advice for Environmental Impact Assessment'. This provides guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.

1.0.7 Applicants should have particular regard to the standing advice in 'Pre-application advice for Environmental Impact Assessment', alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

'Nationally Significant Infrastructure Projects: Advice pages'

1.0.8 This opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Chapter 2)

ID	Ref	Description	Inspectorate's comments
2.1.1	n/a	Scoping process	Given the early stage of the proposed development design, ongoing discussions with statutory bodies are noted as being undertaken by the applicant on the approach to the assessment. The Inspectorate considers that further changes to the proposed development may occur, notably in relation to its operation. The scope of the EIA will therefore continue to be refined through this process. Where this refinement of scope has occurred, the reasons for changes should be set out and justified in the ES, with reference to feedback and, where possible, agreement with statutory bodies. It should be noted that if the proposed development or EIA scope materially changes prior to submission of the Development Consent Order (DCO) application, the applicant may wish to consider requesting a new scoping opinion.
2.1.2	n/a	Proportionate EIA	The Inspectorate supports the principal of proportionate EIA. The size and content of the ES should be focussed on the information needed to explain the significant effects on the environment from the proposed development and should meet the requirements set out in Schedule 4 of the EIA Regulations. Care should therefore be taken not to duplicate information available in other application documents, such as details of the needs case or details of policy tests that could be addressed through appropriate signposting to other application documents. In addition, it is also suggested that the applicant consider whether effective cross referencing could be used to avoid further duplication within each of the aspect chapters. The applicant is also encouraged to narrow the scope further, where

ID	Ref	Description	Inspectorate's comments
			reference is made to this, through further discussions and agreements with relevant bodies.
2.1.3	n/a	Environmental Permits and licences	The Inspectorate considers that the proposed development is likely to require separate environmental permits for its construction, operation and decommissioning. The ES should set out the need for separate consents, permits or licences and where these are relied upon as mitigation for likely significant effects in the EIA, this should also be explained. The Inspectorate encourages cross reference to other DCO application documents relating to licences and consents that would be required for construction, operation and decommissioning of the proposed development to avoid unnecessary duplication.
2.1.4	n/a	Structure of the ES and presentation of information	The following points should be considered for the structure of the ES reflecting on the structure and presentation of information in the scoping report: • considering separate contents pages for each chapter of the ES • defining the extent of boundaries such as mean high / low water springs and low water mark and showing these boundaries on relevant figures • including sheet numbers when labelling figures in the text for ease of reference and clearly labelling figures with the aspect chapter they relate to • clear file naming where figures are supplied in multiple files • considering the naming convention for paragraph numbering in appendices for ease of reference • a glossary of terms as well as a list of abbreviations

ID	Ref	Description	Inspectorate's comments
			The applicant's attention is also drawn to the response from the Broads Authority on the correct terminology for this organisation. This should be applied to both text and any references within figures in the ES.
2.1.5	Para 2.1.3	Parameters - depths	The parameters of the proposed development should include details of a worst-case scenario for the depths of any temporary or permanent excavations. This should include details of the depth and methods for any piling required.
2.1.6	Para 2.3.10 3.1.2 Sections 2.3 and 2.4	Options and flexibility	The scoping report notes that further design work and consideration of options, particularly for the Long Sea Outfall (LSO), is required. Further optionality in the pipelaying techniques to be used is outlined in scoping report section 2.4 and options remain for the design of the water discharge point on the River Waveney (section 2.3). The Inspectorate notes that a 'cautious worst case' would be applied to the assessment where options remain. Every attempt should be made to narrow the range of options in the ES. Where options remain, the ES should explain which elements of the proposed development have yet to be finalised and provide the reasons. The development parameters, including any limits of deviation, should be clearly defined in the draft DCO (dDCO) and in the accompanying ES.
2.1.7	Para 2.3.2	Advanced purification process	The ES should explain the proposed Advanced Purification Process, including the storage or use of any treatment chemicals or flocculants, the locations of any discharges / emissions and generation of waste products from the treatment processes. The use and management of any hazardous substances should also be included. Where relevant, associated information such as numbers and frequency of deliveries or removal of materials and waste during operation from site, their destination and likely disposal routes should also be explained and assessed in relevant chapters. Please also see ID 2.1.3 of this scoping opinion for comments in relation to the environmental permitting process.

ID	Ref	Description	Inspectorate's comments
2.1.8	Para 2.3.18	Sizewell C	The ES should describe the infrastructure required for the proposed development to make a connection at Sizewell C (SZC) Nuclear Power Station. Where new infrastructure is required, this should include and explanation of its construction, operation and plans for decommissioning and an assessment of any potential significant effects. If elements of the connection point are already consented through the Sizewell C Development Consent Order, however, this should be explained along with any additional features that require consent through the Suffolk Water Recycling, Transfer and Storage (WRTS) project. The interface with any Office for Nuclear Regulation licences for the site should also be explained.
2.1.9	Para 2.3.3	Water quality failure events	The ES should explain how water quality would be managed at the Advanced Water Recycling Plant (AWRP) to allow water unsuitable for treatment or discharge to the River Waveney to be recirculated through the AWRP during a water quality failure event. Any additional infrastructure, such as emergency storage tanks or treatment processes that could be required should be described and the ES should then assess any additional potentially significant effects arising from this process. Any changes to the operation of the proposed development should also be considered for this event, where significant effects are likely to occur.
2.1.10	Para 2.3.4	Solar array	Where solar arrays are to be installed as part of the proposed development, the ES should provide details of its design and consider this option in relevant chapters. The applicant is directed to the Planning Inspectorate's solar advice note for further details. https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-technical-advice-page-for-scoping-solar-development

ID	Ref	Description	Inspectorate's comments
2.1.11	Paras 2.3.27 and 2.5.6	Operation of the proposed development	Scoping report para 2.3.27 indicates that the proposed development would be operated only during March to November to alleviate shortfalls from sustainability reductions to the River Waveney, operating with a continuous sweetening flow at other times. Para 2.5.6 indicates that the proposed development would operate 24 hours a day, 7 days a week but does not indicate whether this would be to meet the full transfer capacity at all times of the year, or only during the March to November period. The ES should clarify the operation of the proposed development and whether this would alter operational activities such as traffic movements during the different modes of operation. Where differences in operational activities and modes are likely to occur, including any effects on phasing of the proposed development, this should be reflected in the description of the development and the assessment in the ES, where significant effects are likely to occur.
2.1.12	n/a	Operation of the proposed development	The interface with the operation of the existing Barsham Water Treatment Works (WTW) and any changes required as a result of the proposed development should also be explained.
2.1.13	Para 2.4.10	Proposed underground pipelines	The scoping report notes that further site selection and consultation is planned to confirm the pipelaying techniques. The ES should include details of how environmental effects have been used to inform the final preferred options in each case. Where flexibility remains on the choice of construction techniques, details of the alternatives considered, and consideration of the worst-case effects for each option should be explained in the ES.
2.1.14	Para 2.5.7	Sludge removal tankers	The ES should further explain the nature and quantities of sludge likely to be generated from the AWRP and whether storage of sludge would therefore be required on a temporary basis at the AWRP. This should also then be taken into account within the assessment of

ID	Ref	Description	Inspectorate's comments
			effects for relevant chapters such as, but not limited to, air quality and odour and waste and materials where significant effects are likely to occur.
21.15	Para 2.5.8	Emergency maintenance lighting	Scoping report para 2.5.8 details that task lighting may be employed for ad hoc or 'emergency maintenance'. Planned and unplanned maintenance activities are indicated in para 2.5.18 and within the traffic and access chapter and maintenance. Washout or emergency discharges are indicated in the water environment chapter. The ES will need to detail the circumstances that could lead to the need for emergency maintenance activities and provide an assessment of these activities, where significant effects are likely to occur.
21.16	n/a	Effects associated with potential new LSO	The scoping report identifies 3 potential LSO options, including construction of a new outfall. Little information is supplied of how this would be constructed which has limited the Inspectorate's ability to comment on the scope of the assessment. Where this option remains in the ES, the description should include: • details of construction plant and machinery (both on and offshore) • vehicle movements • the management and disposal of any sediments • effects on existing flood risk management assets • details of construction techniques and details of construction working areas. For the operational stage, the potential for permanent seabed protection measures around any infrastructure and the nature of ongoing management and maintenance should be explained and an assessment of likely significant effects included.
21.17	n/a	Decommissioning of pipelines	The scoping report is inconsistent in its reference to whether, during decommissioning, the pipelines are to be removed or left in situ. The ES should confirm the approach to decommissioning of pipelines and where this uncertainty remains at the time of the

ID	Ref	Description	Inspectorate's comments
			submission of the application, the Inspectorate considers that a worst-case approach should be taken to the assessment of likely significant effects.
2.1.18	n/a	Decommissioning of the proposed development	The Inspectorate acknowledges that the operational lifespan of the proposed development is 80 years. The Inspectorate expects an outline Decommissioning Environmental Management Plan (DEMP) to be submitted with the application setting out the assessment that will be undertaken prior to decommissioning.
2.1.19	n/a	Landscaping	The scoping report has limited information on how landscaping or design measures will be used to address potentially significant effects and how this has been factored into the extent of the Rochdale Envelope approach identified in para 3.3.14. This should be demonstrated in the ES and supported by appropriate figures.
2.1.20	Para 2.3.3 and 2.3.7 Figure 1-3, sheets 4 and 5	River Waveney and order limits	The scoping report proposes to exclude the section of the River Waveney between the discharge point and the existing abstraction point from the order limits as no physical modifications are required to the river. The order limits would also exclude the existing pipeline from the abstraction point to Barsham WTW as this pipeline has existing capacity that can accommodate the proposed development. The scale of Figure 1-3 has not allowed the Inspectorate to determine the extent of the order limits in relation to the River Waveney, but this should take account of any works to the river bank and any in-river works as a minimum. This should include whether there is a need for any in-river measures such as river bed protection at the new outfall and confirm whether physical modifications that could require access within the river during construction (such as temporary coffer dams or similar) are required. The control of operational activities to existing infrastructure that is not included in the order limits should also be explained, including whether there would be changes to the operation of the existing Barsham WTW as a result of the proposed development. Please

ID	Ref	Description	Inspectorate's comments
			also see ID 2.2.2 of this opinion for the Inspectorate's comments on the spatial scope of the assessment in this regard.
2.1.21	n/a	Emergency drawdown	The ES should describe the management of emergency drawdown during operation and an assessment in relevant aspect chapters, where significant effects are likely to occur. The applicant's attention is drawn to the Environment Agency's response in this regard,
2.1.22	n/a	Water consumption	The ES should include estimates of water demands from the proposed development in all phases, including sources of supply. An assessment of effects on water supply should be provided where there is potential for significant effects to occur.
2.1.23	n/a	Construction effects - pollution	The potential effects from pollution from the accidental release of construction drilling fluids should be assessed in relevant chapters (such as ground conditions, water, biodiversity and historic environments). Appropriate pollution control measures should be included within any construction environmental management plan (CEMP).
2.1.24	n/a	Major development in Suffolk	The applicant is directed towards the responses in appendix 2 of this opinion which refer to the extent of other major infrastructure projects that are planned, consented or in construction across the region affected by the proposed development. These include those from Anglian Water, Suffolk County Council and East Suffolk Council and a number of parish councils. Furthermore, it is noted that the order limits of the proposed development overlap with that of a solar farm (EcoPower Suffolk). The ES should identify these overlaps and demonstrate where collaboration, such as sharing of data or joint approaches have been considered.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Chapter 3)

ID	Ref	Description	Inspectorate's comments
2.2.1	n/a	Methods and study areas	The Inspectorate notes several responses from statutory bodies including local planning authorities, the Environment Agency and Natural England that raise questions in relation to the choice of study areas and / or details relating to baseline surveys or assessment methodologies. Given the nature of the proposed development, the Inspectorate considers that some of these methods may be novel or specific to the nature of the assessments required. The ES should demonstrate that the methods used for the assessment have therefore been discussed and, where possible, agreed prior to the assessment being undertaken.
2.2.2	Para 3.3.17	Spatial scope	With reference to ID 2.1.20 of this opinion, these matters should be reflected in the spatial scope and consideration of potential impact-pathways across all relevant aspect chapters.
2.2.3	Para 3.3.20	Removal of plant and machinery Above ground site preparation for temporary contractor facilities Remedial work for contamination or other adverse ground conditions Diversion and laying of apparatus	The scoping report proposes to scope out the following construction activities as no likely significant effects (LSE) are predicted and no mitigation or management is required. No details are included of the temporal or spatial scale of the proposed activities or their location at this stage. In the absence of such information, the Inspectorate does not agree that these matters can be scoped out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
		Receipt and erection of construction plant and machinery Temporary means of enclosure and site security Installation of site drainage including pipework and outfalls	
224	Para 3.3.20	Environmental surveys Site walkovers	The scoping report proposes that these pre-construction activities are scoped out of the assessment in the ES. The Inspectorate agrees that where these activities would be controlled by other professional standards or be controlled through management plans specific to the methods for each survey, such that significant effects are unlikely to occur. The Inspectorate agrees these matters can be scoped out of the assessment.
225	n/a	Assessment years and future baseline	The ES should set out the assessment years assumed for the assessment. This should include an explanation of the nature of the future baseline given the extent of other ongoing infrastructure projects in the region.
226	n/a	Mitigation hierarchy and alternatives	The scoping report refers to the mitigation hierarchy and sets out the approach that is being taken to applying primary, secondary and tertiary mitigation for the effects of the proposed development. The proposed development directly affects several designated and non-designated sites, including internationally designated sites; The Broads and non-statutory and undesignated biodiversity and heritage assets. As part of the mitigation hierarchy approach, therefore, the ES should demonstrate the reasonable alternatives studied by the applicant and

ID	Ref	Description	Inspectorate's comments
			route options that were considered to avoid sensitive areas. Where alternatives have been considered, the reasons for the selection of the preferred option, taking account of the environmental effects of the proposed development, should be explained.
2.2.7	n/a	Mitigation and monitoring	The ES should clearly describe the details of any necessary avoidance and mitigation measures to be implemented, along with monitoring, reporting, and adaptive management procedures. These should be agreed, if possible, with relevant statutory bodies and the ES should explain how these would be secured through the dDCO. To ensure the EIA process is proportionate and front-loaded, the relevant control and management plans submitted with the application should also clearly identify and explain, in detail, the avoidance and mitigation measures that are already known, deliverable, and not dependent on further pre-construction surveys.
2.2.8	n/a	Environmental data sharing	The ES should clearly describe how environmental data collected in all phases of the proposed development would be shared with relevant recording schemes and data depositories, such as Local Environmental Records Centre(s). The ES should also clearly describe how this data-sharing will be secured through the dDCO.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Aspects to be scoped out and scoped in

(Scoping Report Chapters 4 and 5)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.1.1	Section 4.2	Heat and radiation	The scoping report notes that heat and radiation would not be emitted as a result of the construction or operation of the proposed development. The Inspectorate agrees that radiation can be scoped out of the assessment on that basis. However, the Inspectorate notes that no information is provided to establish the temperature of discharged water and the potential effects on receiving waterbodies and aquatic receptors. The Inspectorate does not agree that heat can therefore be scoped out of the assessment at this stage.
ID	**Ref**	**Description**	**Inspectorate's comments**
3.1.2	Para 5.1.4	Biodiversity chapters Coastal and intertidal effects Maritime navigation	The scoping report proposes that these aspects are included within several other aspect chapters and not presented as separate chapters within the ES. This may not enable easy navigation within the ES. Effects on the interface between marine and coastal environments are therefore spread across several chapters. The applicant is requested to review the structure of its ES with regard to these aspects. This should consider whether providing separate aspect chapters or improving the

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			structure for ease of reference would be a more appropriate way of ensuring effects are not lost within multiple different sections.

3.2 Terrestrial Biodiversity

(Scoping Report Chapter 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.1	Para 6.6.2	Pre-construction ecological mitigation	The scoping report proposes to scope out effects from pre-construction ecological mitigation such as temporary barriers and advanced planting. The Inspectorate agrees with this principle, provided that the ES contains information on the nature and location of ecological mitigation measures such that it can inform the assessment of likely significant effects on other aspects such as landscape and visual impact, where significant effects are likely to occur.
3.2.2	Para 6.6.2	Biodiversity surveys and monitoring	The scoping report proposes to scope out effects from biodiversity surveys and monitoring. The Inspectorate agrees that where surveys would be completed in line with recognised industry guidance that this matter can be scoped out of the assessment.
3.2.3	Para 6.6.2	Effects beyond the study area	The scoping report proposes to scope out effects beyond the identified study areas for terrestrial ecology on the basis that these have taken account of the potential for LSE from both direct and indirect effects. The Inspectorate does not agree that significant effects can be scoped out of the assessment on the basis of distance alone. The ES should clearly demonstrate how study areas have been informed by the geographical limits to significant effects and not reliant on arbitrary distances. Noting the comments from, for example, the Environment Agency, Natural England (NE), evidence of discussion with relevant statutory bodies and, where possible, agreement on study areas should therefore be presented in the ES.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.4	Para 6.6.2 Table 6-7	Receptors that are not 'important ecological receptors'	The scoping report proposes to scope out ecological receptors where these are deemed not sufficiently important for significant effects to be material in decision-making, using Chartered Institute of Ecology and Environmental Management (CIEEM) guidance. No list of the receptors is provided. The Inspectorate agrees with the general approach to identifying receptors and the use of established CIEEM guidance to inform the selection of receptors where likely significant effects are most likely to occur. The ES should however provide evidence of agreement to the receptors that have been assessed with relevant statutory bodies in this regard.
3.2.5	Para 6.6.2	Coastal and intertidal habitats - operation	The scoping report proposes that operational effects on coastal and intertidal habitats can be scoped out of the assessment as the outfall pipes would be laid underground and effluent conveyed offshore. The Inspectorate notes in scoping report section 2.5 that above ground structures are required for the pipelines that may require some maintenance during operation. It is not clear from the information whether the outfall pipeline would require similar maintenance during operation or involve above ground structures for that purpose. Given the sensitive nature of the coastal environment in the vicinity of the outfall structures, and in the absence of information on any operational activities that could be required, the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.
3.2.6	Para 6.8.22	Survey scope	The scoping report proposes that for some receptors, surveys may not cover the full study area but will be targeted to specific areas using ecological justification for the extent of surveys. The Inspectorate considers that this approach should be justified in the ES, with evidence of agreement with statutory bodies,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.2.7	Table 6-9	Designated sites located further than 2km from the scoping area where no impact pathways are evidenced (construction and operation)	The scoping report proposes that these sites would be scoped out of the assessment where it is evident there is also no impact-pathway. The Inspectorate agrees with this approach, where evidence is provided of agreement with statutory bodies. Please also however refer to ID 3.2.12 of this opinion for the Inspectorate's comments on additional receptors.
3.2.8	Table 6-9	Statutory designated sites located beyond 5km of the site which are designated for bird species or bird assemblages (construction and operation)	The scoping report proposes to scope these sites out on the basis of a lack of impact-pathways. The Inspectorate notes in table 6-1 that this approach has already been discussed and agreed with Natural England in 2025. As such the Inspectorate agrees that this matter can be scoped out of the assessment. Please also however refer to ID 3.2.12 of this opinion for the Inspectorate's comments on additional receptors including Local Nature Reserves.
3.2.9	Table 6-9	Coastal and intertidal habitats Species groups and species (pipeline decommissioning)	The scoping report proposes to scope out effects on these receptors during decommissioning of the pipelines on the basis that pipes are likely to remain in situ and so no impacts are likely to occur. The Inspectorate notes in scoping report para 2.6.2 that there remains the potential for pipeline components to be removed during decommissioning and that further information on decommissioning activities will be provided in the ES. The Inspectorate is not therefore in a position to agree to scope these matters out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
3.2.10	Table 6.1	Extended study areas	The ES should demonstrate the wider study areas used to identify designated sites that are hydrologically linked to the proposed development on an appropriate figure.
3.2.11	Para 6.3.5	Additional receptors	The scoping report notes a request from Natural England to include Sprat's Water and Marshes, Carlton Colville SSSI within the wintering bird survey. This site should be included therefore on the list of receptors for the assessment, where significant effects are likely to occur. The applicant's attention is drawn to the responses from bodies including the Broads Authority, Natural England, South Norfolk Council, East Suffolk Council, Mid Suffolk District Council and Suffolk County Council for additional designated site and species receptors that should be considered within the assessment.
3.2.12	Para 6.4.10	Field work	The habitat baseline has been based so far on remote methods of data collection, referring to Planning Inspectorate guidance on the use of AI tools. The ES should also demonstrate how the methods accord with any relevant biodiversity industry standards and ensure that where ground truthing is carried out, that this has been done to a level that is acceptable to relevant bodies. Where there have been limitations or uncertainty around the methods used, these should be set out in the ES along with the implications for the assessment. Limitations such as where fieldwork has not been carried out or has been affected by access issues should be supported by evidence of how a worst-case approach has been used in the assessment that has been discussion and, where possible, agreed with statutory bodies.

ID	Ref	Description	Inspectorate's comments
			Every effort should be made to ensure fieldwork and reporting is completed in order to fully inform the assessment of effects prior to submission of the application.
3.2.13	Table 6-3	Cross reference between chapters	The Inspectorate notes reference to designated sites such as the Broads SAC in both the terrestrial and freshwater ecology chapters. The ES should clearly signpost where the assessment of effects on receptors that include both terrestrial and freshwater features to ensure complete coverage and for ease of reference. Please also see ID 3.1.2 of this opinion in this regard.
3.2.14	Para 6.4.10 Table 6-5	Receptors – ancient and veteran trees	The Inspectorate notes several references to the presence of ancient and veteran trees within the study areas, noting also the responses of Norfolk County Council, South Norfolk District Council, Eye Parish Council and the Broads Authority in this regard. The ES should be supported by an appropriate tree survey to inform the assessment of effects on these receptors.
3.2.15	n/a	Baseline and wildfires	The ES baseline should discuss baseline conditions with relevant statutory bodies for those areas of Suffolk that suffered the effects of wildfires in 2026.
3.2.16	n/a	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features. Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm.

ID	Ref	Description	Inspectorate's comments
			All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.

3.3 Freshwater Biodiversity

(Scoping Report Chapter 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	Para 7.6.2	Pre-construction ecological mitigation	Please refer to ID 3.2.1 of this scoping opinion for the Inspectorate's comments.
3.3.2	Para 7.6.2	Biodiversity surveys and monitoring	Please refer to ID 3.2.2 of this scoping opinion for the Inspectorate's comments.
3.3.3	Para 7.6.2	Impacts on freshwater biodiversity receptors beyond study area Impacts on watercourses, waterbodies, and associated freshwater habitats	The scoping report proposes that impacts beyond the identified study areas where there is no realistic hydrological, hydrogeological or ecological pathway can be scoped out of further assessment. The Inspectorate agrees with this principle, however the extent of the study area should take account of the Inspectorate's comments in ID 3.2.3 and 3.3.5 of this scoping opinion in this regard.
3.3.4	Para 7.6.2	Impacts on designated sites beyond the defined study area (with no hydrological, hydrogeological, water quality, or connectivity with other habitats and species)	The Inspectorate notes that there is no specific list of receptors provided that demonstrates in each case, the lack of impact-pathways. Given the extent of designated sites directly affected by the proposed development, the Inspectorate does not agree that these receptors can be scoped out of the assessment at this stage without this justification.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.5	Para 7.6.2	Impacts on freshwater biodiversity receptors not considered important ecological features	The scoping report proposes to scope out ecological receptors where these are deemed not sufficiently important for significant effects to be material in decision-making, using Chartered Institute of Ecology and Environmental Management (CIEEM) guidance. No list of the receptors is provided. The Inspectorate agrees with the general approach to identifying receptors and to scoping this matter out with the use of established CIEEM guidance to inform the selection of receptors where likely significant effects are unlikely to occur. The ES should however ensure that evidence of discussion on the receptors that would be assessed with statutory bodies is included.
3.3.6	Para 7.6.2	Effects on WFD waterbodies as standalone ecological receptors	The scoping report proposes to scope out effects on Water Framework Directive (WFD) bodies as these are captured within the assessment of effects in the water environment chapter of the ES. The Inspectorate agrees that this matter can be scoped out of the assessment on that basis. Please also see ID 3.1.2 of this opinion.
3.3.7	Para 7.6.2	Effects on semi-aquatic mammals, amphibians and other freshwater species not dependent on aquatic environments	The scoping report proposes to scope out effects on these receptors on the basis that they would be assessed within the terrestrial biodiversity assessment. The Inspectorate agrees that this matter can be scoped out of the assessment on that basis. Please also see ID 3.1.2 of this opinion.
3.3.8	Para 7.6.2 Para 7.5.18	Operational effects associated with buried pipelines and distribution mains with no routine interaction with a	The scoping report proposes to scope out these matters on the basis that maintenance, washout and emergency discharge effects are scoped in for the operational assessment. The Inspectorate notes that these effects are not however included in the scope of the assessment described in scoping report para 7.5.18 and as such, does not agree that these matters can be scoped out of the assessment at this stage.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		watercourse or freshwater habitat	

ID	Ref	Description	Inspectorate's comments
3.3.9	Para 7.1.3 Table 7-3	Cross references within the scoping report	The scoping report includes incorrect cross references to other related chapters of the report. For example, scoping report chapter 7 states that the assessment of groundwater dependent terrestrial ecosystems is provided in scoping report 6 (terrestrial ecology), whereas it appears in scoping report chapter 9. Cross references between related assessments and chapters in the ES should therefore be accurately referenced and demonstrate that appropriate collaboration between related assessments has been carried out. Please also refer to ID 3.1.2 of this scoping opinion for the Inspectorate's comments on cross referencing between associated assessments.
3.3.10	Section 7.2	Study area	The scoping report proposes a 2km Zone of Influence (ZoI) for fish species. The Inspectorate considers that the ZoI within the ES should be widened to take account of fish behaviour, migration patterns and lifecycles. The study area should therefore be discussed and, where possible, agreed, with relevant statutory bodies.
3.3.11	Para 7.5.2	Barriers to fish movement and spawning	The ES should consider the potential for permanent as well as temporary barriers to fish movement and spawning as a result of the proposed discharge to the River Waveney, where significant effects are likely to occur.
3.3.12	Para 7.5.13 and	Habitat disturbance	Disturbance / habitat disturbance are identified as matters to be scoped into the assessment, but the description does not include what receptors could be affected specifically and what forms of disturbance this could include. The Inspectorate considers

ID	Ref	Description	Inspectorate's comments
	Table 7-13		that disturbance from potential noise and vibration and lighting should be considered, where significant effects are likely to occur.
3.3.13	Para 7.4.16	River Blyth priority habitat	The scoping report notes that this priority habitat area lies outside of the proposed study area but is scoped into the assessment due to the potential for hydrological connectivity with the proposed development. The ES should demonstrate how the proposed study area is sufficient therefore to capture all receptors that could be hydrologically linked to the proposed development, noting that a wider 1km study area is applied within the water environment scoping report chapter.
3.3.14	Para 7.8.21	In-combination effects – marine and terrestrial biodiversity interactions	The ES should consider the impact of all stages of the proposed development on the lifecycles of diadromous fish species.
3.3.15	Para 7.8.26	Limitations and assumptions – survey effort	Where possible, evidence of discussion and agreement with relevant statutory bodies, where a focussed approach to survey coverage has been taken should be included in the ES.
3.3.16	Para 7.8.31	Other aspect chapters	Scoping report section 7.8 defines the boundaries between the terrestrial, marine and freshwater biodiversity assessments to signpost where the assessment of effects would be presented in the ES in each case. The assessment of effects on the outer estuarine waters of the River Waveney estuary beyond the saline limit is noted as being presented in the marine biodiversity assessment, however there is no reference to this receptor within that chapter which defines its scope in para 8.1.2 as those receptors seawards of mean high-water springs (MHWS) and specific to the LSO. This should be clarified in the ES. Please also refer to ID 3.1.2 of this opinion.

ID	Ref	Description	Inspectorate's comments
3.3.17	n/a	Effects from noise – all phases	The ES should include an assessment of the effects of noise disturbance on freshwater fish, where significant effects are likely to occur.
3.3.18	n/a	Spread of aquatic Invasive Non-Native Species (INNS)	The ES should clearly define the methodology that would be used to identify and assess potential transfer and spread of aquatic INNS. This should include consideration of the presence and risks from floating pennywort.

3.4 Marine Biodiversity

(Scoping Report Chapter 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	Para 8.6.2	Marine biodiversity receptors that are not 'important ecological features'	The scoping report proposes to scope out ecological receptors where these are deemed not sufficiently important for significant effects to be material in decision-making, using Chartered Institute of Ecology and Environmental Management (CIEEM) guidance. No list of the receptors is provided. The Inspectorate agrees with the general approach to identifying receptors and to scoping this matter out with the use of established CIEEM guidance to inform the selection of receptors where likely significant effects are unlikely to occur. The ES should however ensure that evidence of discussion on the receptors that would be assessed with statutory bodies is included.
3.4.2	Para 8.6.2	Marine biodiversity receptors beyond the study area	The Inspectorate agrees that where the study area identifies both direct and indirect effects and the extent of the study area has been discussed with relevant statutory bodies, that receptors outside of this area can be scoped out of the assessment.
3.4.3	Para 8.6.2	Statutory and non-statutory designated sites beyond the study area	The Inspectorate agrees that this matter can be scoped out of the assessment, where study areas have been discussed and agreed with relevant statutory bodies.

ID	Ref	Description	Inspectorate's comments
3.4.4	Para 8.1.2	Assessment of long sea outfall (LSO)	The scoping report proposes that three options for the LSO would be assessed in the ES for effects on marine biodiversity. With reference to ID 2.1.16 of this scoping opinion, the

ID	Ref	Description	Inspectorate's comments
	And 8.4.5		Inspectorate's comments on the scope of the marine assessment for the LSO has been limited given the details available on the options at this stage. Given that all proposed options for the LSO would result in changes to discharges to the marine environment, the Inspectorate considers that all options should be assessed in the ES and the scope of baseline studies should therefore cover all 3 options. The Inspectorate considers that the ES should also consider the potential effects from any permanent seabed or coastal protection measures required as part of the proposed development for all options.
3.4.5	Para 7.3.14	Study area for the marine assessment	Please refer to ID 3.3.16 of this scoping opinion for the Inspectorate's comments on inconsistencies in the coverage of the freshwater, terrestrial and marine biodiversity assessments. The assessment presented in the ES should include consideration of the transition between freshwater, estuarine and marine environments.
3.4.6	Para 8.2.4	Study area	The ES should provide justification for the selection of the proposed 6km study area for the discharge of concentrated residual water. The chosen study area should take account of a worst-case discharge envelope and these parameters should be discussed and where possible agreed with relevant statutory bodies.
3.4.7	n/a	Baseline data collection	The marine biodiversity chapter uses data from previous developments and studies to inform the baseline for the assessment. The ES should demonstrate how these data have informed the baseline, explain any limitations and how any gaps in data have been addressed and where relevant, approaches agreed with statutory bodies.
3.4.8	Para 8.1.2 8.4.10	Spatial scope of marine biodiversity chapter	The Inspectorate notes reference to the assessment of effects on coastal sand dune priority habitats as being covered in the terrestrial ecology chapter of the scoping report, however, the terrestrial ecology chapter does not include reference to these receptors.

ID	Ref	Description	Inspectorate's comments
			The ES should ensure that it is clear which chapters are covering areas of transitional habitats such as these so that no areas of land are omitted from the ES.
3.4.9	Paras 8.4.4 to 8.4.6	Haul-out sites	The scoping report notes data from 2019 onwards identifying mean total counts of grey and harbour seals within the study area. The scope of the assessment in the ES should clarify the potential for the proposed development to affect seal haul-out sites during all phases of the proposed development from loss of habitat and disturbance / displacement effects. An assessment should be provided in each case where significant effects are likely to occur.
3.4.10	Paras 8.5.6 and 8.5.7	Assessment of marine water quality	The marine biodiversity chapter also includes effects relating to marine water quality. Where this structure and chapter names are to be used in the ES, the applicant should ensure that the labelling of chapters and sections enables understanding of where matters are being assessed. Please also refer to ID 3.1.2 of this opinion.
3.4.11	Para 8.7.4	Secondary mitigation – seasonal restrictions	The Inspectorate considers that there is potential for maintenance and management works during operation with associated likely significant effects on marine biodiversity. Consideration of these activities and the potential for the need for seasonal restrictions during operation as well as during construction should be addressed in the ES. Effort should be made to agree the timing and duration of any seasonal restrictions with relevant statutory bodies, along with agreement on the nature of any mitigation measures.
3.4.12	Table 8-10	Magnitude of impact	The applicant is directed to the comments from the Environment Agency on taking a worst-case approach to defining the magnitude of effect on marine receptors.
3.4.13	n/a	Marine water quality	The ES should include an assessment of the risks to the intertidal zone from bentonite releases from any drilling associated with the LSO.

ID	Ref	Description	Inspectorate's comments
3.4.14	n/a	Water quality - operation	The ES should include an assessment of effects on benthic communities as well as water column communities from the discharge of effluent.
3.4.15	n/a	Figures	The ES should include a figure illustrating the locations of the coastal and intertidal zones referred to in the text for ease of reference.

3.5 Water Environment

(Scoping Report Chapter 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.5.2	Figure 7-1 Para 9.2.2	Study area	The scoping report notes an extension to the 1km water environment study area to include the existing Barsham WTW abstraction point and a 500m downstream stretch of the River Waveney. The ES should demonstrate this extended study area on a figure and include appropriate labelling to explain the location of the water treatment works and abstraction point for ease of reference.
3.5.3	Table 9-29	Hydromorphology	The effects on hydromorphology from the potential release of drilling fluids during construction should be assessed in the ES.
3.5.4	Table 9-29	Effects on existing watercourses and drainage infrastructure – all phases	The ES should also assess effects from any alterations to the existing drainage network, such as temporary or permanent physical alterations to watercourses, the introduction of water to the drainage network and effects on the ability to carry out management and maintenance activities to existing watercourses and drainage channels, where significant effects are likely to occur.
3.5.5	Table 9-32	Secondary mitigation measures	The ES should include an outline Operational Management Plan to secure measures during the operation phase.

ID	Ref	Description	Inspectorate's comments
3.5.6	Table 9-34	Bathing water	The ES should include reference to bathing waters as potential receptors for the water environment assessment, where significant effects could occur.
3.5.7	Table 9-37	Flood risk to infrastructure	The effects of flooding on the operation, functionality and resilience of the proposed development should be assessed in the ES.
3.5.8	n/a	Drainage strategy	The ES should be accompanied by an outline drainage strategy, or refer to this document where it is provided within the wider application documents.
3.5.9	n/a	Statutory body comments	Please refer to ID 2.2.1 of this opinion for the Inspectorate's comments on methods and study areas.

3.6 Landscape and Visual

(Scoping Report Chapter 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	Para 10.6.1 Table 10-10	Ancient woodland, veteran trees and Tree Preservation Order (TPO) trees located greater than 15 metres from the Order Limits – all phases	The scoping report proposes to scope out landscape or visual effects associated with landscape features from ancient woodland and veteran/ TPO trees on the basis that root protection zones for these are considered unlikely to be directly affected by any activities associated with the proposed development. The applicant is advised to have regard to the relevant and standing advice relating to ancient woodland, ancient trees and veteran trees which identifies 15 metres to be the minimum buffer from the boundary of ancient woodland to avoid root damage. Other considerations, including potential indirect impacts, must also be taken into account. Accordingly, the Inspectorate does not consider that the presence of a 15 metre buffer alone provides sufficient justification to rule out the potential for LSE on ancient woodland or veteran trees. The ES should therefore assess both direct and indirect effects on these features, set out any measures proposed to avoid, reduce or mitigate adverse effects, and identify opportunities for enhancement where appropriate. Please refer to ID 3.2.14 of this opinion for the Inspectorate's comments in relation to tree surveys.
3.6.2	Para 10.6.2	Individual hedgerows - all phases	The scoping report proposes to scope out assessment of individual hedgerows, including those classified as 'important' under the Hedgerows Regulations 1997, on the basis that impacts will be assessed collectively rather than on a feature-by-feature basis. This approach is justified on the grounds that effects are anticipated to be localised, limited in extent, and broadly similar in nature, particularly along the pipeline routes.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			However, paragraph 11.5.3 acknowledges that construction activities may result in the loss of sections of 'important' historic hedgerows and changes to historic landscape character, with the potential to give rise to significant adverse effects. The scoping report also recognises that the extent of hedgerow loss, if any, has not yet been determined. The Inspectorate considers that there is currently insufficient evidence to justify scoping out the assessment of individual hedgerow loss without these details or reference to other assessments, such as terrestrial biodiversity and / or the historic environment. The ES should assess the significance of any effects arising from significant hedgerow loss, fragmentation or alteration, together with any measures proposed to avoid, reduce or compensate for adverse effects, including those to address temporary losses of hedgerow.
3.6.3	Para 10.6.3 and Table 10-10	Designated landscapes, local landscapes and seascape character areas beyond 2km – construction and operational phase	The scoping report proposes to scope out views from the Broads and the Suffolk and Essex Coast & Heaths National Landscape, as views beyond 2km are not likely to give rise to significant effects. The scoping report details that the study areas are subject to further refinement from survey data and engagement with statutory bodies. The LVIA should provide a clear justification for the agreed extent and viewing distances, demonstrating that the approach is proportionate and appropriately focused on areas where significant landscape and visual effects are likely to occur. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is therefore not in a position to agree to scope these matters out of the assessment. Accordingly, the ES should include an assessment of these matters or demonstrate agreement with the relevant statutory bodies to the absence of an LSE. The applicant's attention is directed towards comments from East Suffolk Council in appendix 2 of this opinion in this regard.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.4	Table 10.10	Principal visual receptors beyond 2km of the proposed development – construction and operational phase	The scoping report proposes to scope out this matter on the basis that views beyond 2km would be unlikely to give rise to significant effects. The scoping report details that the study areas are subject to further refinement from survey data and engagement with statutory bodies. Once the study area has been finalised, the LVIA should provide a clear justification for the agreed extent and viewing distances, demonstrating that the approach is proportionate and appropriately focused on areas where significant landscape and visual effects are likely to occur. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is therefore not in a position to agree to scope these matters out of the assessment. Accordingly, the ES should include an assessment of these matters or demonstrate agreement with the relevant statutory bodies to the absence of an LSE.
3.6.5	Para 10.6.4	Night-time effects at viewpoints beyond 1 km – all phases	The scoping report proposes to scope out night time effects at viewpoints beyond 1km on the basis that significant night-time effects are only reasonably foreseeable in limited locations close to the proposed development. The scoping report details that visual effects are expected to be highly localised around lit infrastructure and compounds. The Inspectorate considers that there is limited information provided on the lighting scheme for the proposed development at this stage. As such, the Inspectorate is not in a position to scope this matter out. Impacts from lighting should be considered, such as within the landscape and visual chapter of the ES.
3.6.6	Para 10.6.4	Night-time effects of all residential receptors beyond 500m - operation	The scoping report proposes to scope this matter out on the basis that there will be limited lighting required during the operation of the proposed development. The Inspectorate notes the proximity of the proposed development to dark sky areas and without information

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			on the proposed lighting requirements, does not therefore agree to scope this matter out at this stage. The applicant's attention is also drawn to the comments from the Broads Authority in appendix 2 of this opinion with regards to the night time assessment of LSE within the Broads Authority Executive Area.

ID	Ref	Description	Inspectorate's comments
3.6.7	Para 10.2.4	Representative viewpoints	The ES should include evidence of any agreement reached with the relevant planning authorities as to the final viewpoint selection.
3.6.8	Paras 10.2.1 and 10.2.2	Study area – Zone of Theoretical Visibility (ZTV)	The scoping report details that the study areas have been informed by desk-based study but that a preliminary ZTV has not yet been prepared. A preliminary ZTV, followed by appropriate fieldwork should be carried out to test the assumptions made during the desk study and inform the assessment in the ES. Study areas of 3km radius for landscape and 5km radius for views from the boundary of the scoping area are identified on figures 10.1 to 10.3. It is noted that these are subject to further refinement and this should be done with engagement with statutory bodies.
3.6.9	Para 10.4.4 and 10.4.12	Missing appendices 10.2 and 10.3	Appendix 10.2 and appendix 10.3 do not appear to be provided within the volume II: Appendices. These details should be supplied within the ES.
3.6.10	Paragraph 10.7.2	Mitigation – bunding and hoarding	The list of primary, secondary and tertiary mitigation measures relevant to landscape and visual effects includes the use of bunds and hoarding to perform a screening function. The Inspectorate considers that these measures are capable of generating visual effects in

ID	Ref	Description	Inspectorate's comments
			their own right, depending on their location and scale. The ES should include an assessment of effects arising from screening mitigation measures, where significant effects are likely to occur.
3.6.11	n/a	Landscape Character Areas	The ES should include figures showing the Landscape Character Areas (LCAs) and should include all affected and neighbouring LCAs.

3.7 Terrestrial Historic Environment

(Scoping Report Chapter 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.7.2	Para 11.4.3	Baseline methodology	The ES should make use of existing borehole logs to establish the geology underlying the proposed development. The Inspectorate notes that the marine archaeology assessment (scoping report chapter 12) refers to the preparation of a ground deposit model. The Inspectorate considers that predictive modelling should also be used to inform the assessment on the terrestrial historic environment and attention is drawn to the response from Suffolk County Council in this regard and for comments on the approach to defining the baseline for this aspect assessment.
3.7.3	n/a	Baseline data	Baseline data should include reference to any Portable Antiquities Scheme finds. Where these finds are considered confidential records, these should be supplied in a separate, confidential appendix in the ES.
3.7.4	Para 11.5.2	Construction effects – changes to the water environment	The ES should include an assessment of effects on heritage assets from potential changes to the water environment, particularly for areas close to watercourses and where peat deposits are likely to be present.
3.7.5	Para 11.5.2	Construction and operation effects - dewatering	The ES should include an assessment of effects on heritage assets from any dewatering during construction and potential for this to result in permanent changes during the operation phase. The assessment should consider the potential for these effects to occur

ID	Ref	Description	Inspectorate's comments
			to heritage assets both inside and outside of the red line boundary. The study area should therefore be discussed and where possible agreed with relevant statutory bodies.
3.7.6	Para 11.5.2	Construction effects – soil compaction	The ES should include an assessment of the effects from potential soil compaction on heritage assets arising from construction activities and traffic movements.
3.7.7	Para 11.8.1	Assessment methodology	Where appropriate, the methodology in the ES should also include preparation of appropriate section drawings and photomontages to illustrate potential effects on heritage assets.
3.7.8	n/a	Effects on perception of heritage assets	The ES should include an assessment of the potential impact of activities such as construction traffic might have upon perceptions, understanding and appreciation of the heritage assets in the area, where significant effects are likely to occur.
3.7.9	n/a	Effects from changes to drainage	The assessment should also consider potential for significant effects from alterations to drainage patterns leading to decomposition or destruction of below ground archaeological remains and deposits.
3.7.10	n/a	Assessment methodology	The applicant's attention is drawn to the comments such as from Historic England (HE),Great Yarmouth Borough Council in relation to the assessment of effects on setting.
3.7.11	Para 11.4.99	Palaeolithic remains / palaeo-environmental deposits	The marine historic environment chapter refers to the assessment of effects on potential palaeolithic deposits within the area of the LSO. Para 11.4.99 notes potential for palaeo-environmental / waterlogged remains where the proposed development crosses the River Yox. The ES should also assess the potential for these remains to be present, where significant effects are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.7.12	n/a	Vibration	The direct and indirect effects of vibration from the proposed development on affected heritage assets should be considered in the ES, where significant effects are likely to occur.

3.8 Marine Historic Environment

(Scoping Report Chapter 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.8.2	n/a	Scoping in relation to implementing LSO option 2 or 3	The Inspectorate notes the applicant's intention to review the potential for significant effects on the Marine Historic Environment should the decision be taken to implement options 2 or 3. The ES should justify the approach taken and where possible demonstrate agreement with the relevant statutory bodies.
3.8.3	Para 12.8.4	Guidance	The Inspectorate notes that the applicant has based its methodology on the Design Manual for Roads and Bridges approach, for which HE has raised queries on in its consultation response (see appendix 2). HE has suggested that the methodology should be informed by Crown Estate's Archaeology Written Schemes of Investigation for Offshore Wind Projects and Historic England's Marine Geophysics Data Acquisition, Processing, Interpretation and Guidance Notes. The applicant is encouraged to discuss this matter further with HE and other relevant bodies to seek agreement over the methodological approach.
3.8.4	Section 12.7	Mitigation	The Inspectorate encourages the applicant to agree mitigation measures with relevant bodies.

ID	Ref	Description	Inspectorate's comments
3.8.5	Para 12.16	Study area	The applicant should review the response from HE on the definition of the study area and consider these comments in determining the final study area for the proposed development.
3.8.6	Paras 12.4.3 12.4.6 and 12.4.18	Terminology, definitions and distinctions	The applicant should consider UK Marine Policy Statement and English Marine Plans to inform the distinctions between designated and non-designated heritage assets. The applicant is encouraged to also consider these documents in applying consistent terminology and definitions in the ES.

3.9 Traffic and Access

(Scoping Report Chapter 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 13-16	New Pumping Station at the existing Lowestoft Water Recycling Centre (WRC) – operation and decommissioning	The Inspectorate agrees that during operation, vehicle trips are not likely to exceed assessment thresholds and therefore agrees to scope this matter out. The scoping report seeks to scope out this component from the decommissioning assessment because it would be decommissioned as part of the existing Lowestoft WRC should this occur. The Inspectorate is content with this approach.
3.9.2	Table 13-16	Proposed LSO – operation and decommissioning	The Inspectorate agrees that during operation, vehicle trips are not likely to exceed assessment thresholds and therefore agrees to scope this component out. The Inspectorate does not consider the decommissioning effects to be so dissimilar to the construction impacts as to justify the scoping in of construction impacts and the scoping out of decommissioning impacts. The ES should set this out in relation to vehicle trips required and demonstrate no likely significant effects to enable decommissioning to be scoped out of the assessment.
3.9.3	Table 13-16	Proposed pipelines: Lowestoft WRC to AWRP AWRP to River Waveney Barsham WTW to Central Service	The Inspectorate agrees that during operation, vehicle trips are not likely to exceed assessment thresholds and therefore agrees to scope this component out. The scoping report is unclear as to whether the pipelines would be left in situ. The ES should clarify this and should the pipelines be removed, the ES should set out the vehicle trips required and demonstrate no likely significant effects to enable decommissioning to be scoped out of the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		Reservoir (CSR) Pipeline Barsham WTW to CSR to Walpole WTW Pipeline CSR to WSR • CSR to Saxmundham Pipeline water tower Saxmundham to SZC	
3.9.4	Table 13-16	Eastern Distribution Mains Western Distribution Mains	The Inspectorate agrees that during operation, vehicle trips are not likely to exceed assessment thresholds and therefore this matter can be scoped out of the assessment. The Inspectorate does not, from the information provided, consider the decommissioning effects to be so dissimilar to the construction impacts as to justify the scoping in of construction impacts and the scoping out of decommissioning impacts. The ES is unclear as to whether the pipelines would be left in situ. The ES should set this out in relation to vehicle trips required and demonstrate no likely significant effects to enable decommissioning to be scoped out of the assessment.
3.9.5	Table 13-19	Reduced accessibility resulting in severance; decline in pedestrian amenity affecting user experience and footfall on open spaces, recreational sites, shopping areas –	The scoping report seeks to scope this matter out noting that no significant effects are predicted. Table 13-19 however identifies that both the magnitude and the anticipated sensitivity have the potential to be high. The scoping report also references the potential need to realign public rights of way (PRoW). It is not clear whether these routes lead to open/recreational spaces. Noting these matters and a lack of further justification, the Inspectorate is not content to scope this out at this time based on the information presented. Furthermore, the ES should consider the potential for intra-project effects with

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		construction and operation phases	public health and socio-economic assessments. It is noted that Suffolk County Council (appendix 2) have requested a specific PRoW assessment.
3.9.6	Table 13-19	Potential reduction in pedestrian amenity (including fear and intimidation) due to increases in noise, dust vibration and visual intrusion. Minor implications for severance and accident and safety from operational activity on people at home – operational phase	The scoping report in table 13-19 sets out that for people at home, the magnitude of effect is predicted to be very low and the sensitivity low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees that this matter can be scoped out.
3.9.7	Table 13-19	Reduced pedestrian amenity from noise, dust; permanent access restrictions resulting in severance, and potential accidents and safety risks associated with nearby construction on people in workplaces – operational phase	The scoping report in table 13-19 sets out that for people in workplaces, the magnitude of effect is predicted to be very low and the sensitivity low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.8	Table 13-19	Increased severance due to changes in access and crossing points; greater sensitivity to pedestrian delay; reduced pedestrian amenity (including fear and intimidation); elevated accident and safety concerns on sensitive and/or vulnerable groups including children, the elderly and the disabled – operational phase	The scoping report in table 13-19 sets out that for vulnerable groups, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.9	Table 13-19	Potential severance where access is constrained; reduced pedestrian amenity due to noise/vibration; localised accident and safety considerations on sensitive locations – operational phase	The scoping report in table 13-19 sets out that for sensitive locations, the magnitude of effect is predicted to be very low and the sensitivity low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.10	Table 13-19	Route diversions resulting in severance and increased pedestrian delay. Reduced safety/amenity during operation on people walking – operational phase	The scoping report in table 13-19 sets out that for people walking, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.11	Table 13-19	Diversions and permanent route changes resulting in severance and increased non-motorised user delay; reduced pedestrian amenity (including fear and intimidation) due to interaction with operational traffic and potential for accident and safety risks on people cycling – operational phase	The scoping report in table 13-19 sets out that for people cycling, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.12	Table 13-19	Reduced accessibility resulting in severance; decline in pedestrian	The scoping report in table 13-19 sets out that for open spaces, recreational sites and shopping areas, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		amenity affecting user experience and footfall on open spaces, recreational sites and shopping areas – operational phase	likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.13	Table 13-19	Physical and functional severance of habitats; indirect effects on environmental quality of sites of ecological/nature conservation value – operational phase	The scoping report in table 13-19 sets out that for sites of ecological/nature conservation value, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.14	Table 13-19	Reduced accessibility (severance) and increased pedestrian delay; decline in pedestrian amenity affecting visitor experience on sites of tourist and visitor attraction – operational phase	The scoping report in table 13-19 sets out that for sites of tourist/visitor attraction, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.15	Table 13-19	Increased driver delay due to increases in traffic congestion and diversions; potential accidents and safety impacts from altered layouts on vehicle drivers and passengers – operational phase	The scoping report in table 13-19 sets out that for vehicles drivers and passengers, the magnitude of effect is predicted to be low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.16	Table 13-19	Increased driver delay (affecting bus journey times) and some pedestrian delay where stops are relocated; minor severance where access to stops changes; reduced pedestrian amenity. No impact on rail service anticipated on public transport passengers – operational phase.	The scoping report in table 13-19 sets out that for public transport passengers, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.17	Table 13-19	Potential disruption to vessel movements, navigation routes and port operations and	The scoping report in table 13-19 sets out that for public transport passengers, the magnitude of effect is predicted to be very low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		access to marine infrastructure on marine traffic – operational phase	activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.18	Table 13-19	Reduced pedestrian amenity from noise, dust; access restrictions resulting in severance, and potential accidents and safety risks associated with nearby construction on people in workplaces – operational phase	The scoping report in table 13-19 sets out that for people in workplaces, the magnitude of effect is predicted to be low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.19	Table 13-19	Disruption to routes causing severance; reduced pedestrian amenity (including fear and intimidation) from noise and movement of plant vehicles; potential safety risks on people horse riding – operational phase	The scoping report in table 13-19 sets out that for people horse riding, the magnitude of effect is predicted to be low and the sensitivity; low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.20	Table 13-19	Reduces accessibility resulting in severance; decline in pedestrian amenity affecting user experience and footfall on open spaces, recreational sites, shopping areas – operational phase	The scoping report in table 13-19 sets out that for open spaces, recreational sites, shopping areas, the magnitude of effect is predicted to be low and the sensitivity low. As such, no significant effects are expected. Suffolk County Council do not agree to scoping this matter out at this time. Based on the information presented, the Inspectorate agrees that this should not be scoped out at this time where concerns remain from relevant bodies.
3.9.21	Table 13-19	Physical and functional severance of habitats; indirect effects on environmental quality on sites of ecological nature conservation value – operational phase	The scoping report in table 13-19 sets out that for sites of ecological/nature conservation value, the magnitude of effect is predicted to be low and the sensitivity low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.
3.9.22	Table 13-19	Reduced accessibility (severance) and increased pedestrian delay; decline in pedestrian amenity affecting visitor experience on sites of	The scoping report in table 13-19 sets out that for sites of tourist/visitor attractions, the magnitude of effect is predicted to be low and the sensitivity low. As such, no significant effects are expected. Based on the information presented, and the likely activities required during operation set out in table 13-13, the Inspectorate agrees with the scoping out of this matter.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		tourist /visitor attractions – operational phase	
3.9.23	Table 13-19	Potential disruption to vessel movements, navigation routes and port operations and access to marine infrastructure on marine traffic – operational phase	The scoping report in table 13-19 sets out that for sites on marine traffic, the magnitude of effect is predicted to be very low and the sensitivity low. Given the uncertainty around the nature of marine traffic presented, the Inspectorate does not agree with the scoping out of this matter at this time and that further information and agreement with relevant bodies should be included in the ES.

ID	Ref	Description	Inspectorate's comments
3.9.24	Table 13-16	Clarification of vehicle figures	It is noted that this table refers to 'de-minimis' change in existing vehicle movements. The ES should set out these movements to enable agreement on whether these are de-minimis in change. The ES should clearly set out the proposed vehicle movements for all phases of the proposed development.
3.9.25	n/a	Study Area	It is noted that the proposed development has a large geographical spread across a number of counties and council authorities. The ES should ensure that the study area encompasses all routes upon which a likely significant effect could occur including cumulative effects, recognising other plans and projects within the study area and developments from them thereof, for example the Sizewell link road. The ES should also be clear on all potential construction routes to be used. A number of consultation responses raised queries in relation to the identified study area. This study area should be agreed with relevant bodies.

ID	Ref	Description	Inspectorate's comments
3.9.26	n/a	Plans	The ES should include a clear plan or the current road network, a future baseline road network and all permanent and temporary routes need for the proposed development and how these interact with other plans and projects.
3.9.27	n/a	Sensitive receptors	The applicant is advised, noting the rural nature and number of projects within the study area, to agree sensitivity of receptors with relevant bodies to ensure a robust assessment.
3.9.28	Tables 13-2 to 13-12	Consistency	Suffolk County Council note that the tables make inconsistent references to the strategic road network. The applicant should consider this further and seek agreement of categorisation of roads and the impact of this on the assessment with the relevant bodies.
3.9.29	Figure 13-15	Local and national cycle routes	This figure does not depict local cycle routes in the area; the ES should consider any likely significant effects on local and national cycle routes.
3.9.30	n/a	Operational effects	A number of operational effects have been scoped out of the assessment. It is noted that little detail is provided in relation to vehicle figures. The applicant should consider whether any abnormal indivisible loads will be required during operation and discuss this further with relevant bodies, clarifying the potential and any likely significant effects of these in the ES.
3.9.31	n/a	Departure from guidance	The scoping opinion has specifically considered horse riding outside of the definition of non-motorised users and has considered the impacts upon them differently. The guidance sets out that the assessment should be undertaken on non-motorised users which would include horse riding, the ES should justify this departure from guidance to ensure a robust assessment.
3.9.32	Table 13-16	Cumulative effects	The Inspectorate considers that the approach of scoping the assessment based on proposed development components (such as pipelines) has the potential to miss intra-project effects. The Inspectorate recognises the geographical extent of the proposed

ID	Ref	Description	Inspectorate's comments
			development, however, the ES needs to clarify that this approach has considered the potential for multiple components to individually have negligible or minor effects, but when considered alongside another component on a specific receptor, result in significant effects. It is also noted there are a number of other projects that are likely to be under construction in the area at a similar timescale and therefore full consideration of inter and intra project effects should be set out in the ES.
3.9.33	Table 13-16	Scoping out	The Inspectorate has agreed to scope a number of matters out based on the information provided, however notes that limited information has been provided in relation to vehicle trips. This information should be provided in the ES to support confirmation that these matters can be scoped out.

3.10 Noise and Vibration

(Scoping Report Chapter 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Para 14.6.1 Table 14-9	Noise associated with operational traffic	The scoping report proposed to scope out this matter on the basis that there will be limited trips for maintenance, repair, refurbishment or replacement of equipment to the above ground infrastructure associated with the proposed development. The scoping report proposes that the AWRP component is anticipated to have up to 1 tanker delivery (one two-way vehicle movement) per week, and road traffic movements associated with up to 3 full-time equivalent (FTE) workers on-site. Limited information has been provided at this stage in relation to operational vehicle types, numbers, and movements for all proposed components to rule out significant effects. However, the Inspectorate is content to scope this matter out on the basis that the ES supplies evidence to demonstrate that traffic would not generate noise at sensitive receptors and LSE would not occur based on traffic numbers being below established thresholds set out within guidance. The applicant should take note of comments in section 3.9 of this opinion made in relation to the transport and access assessment.
3.10.2	Para 14.6.2 Table 14-9	Noise and vibration from pipeline components – operational phase	The scoping report proposed to scope out this matter on the basis that the pipeline will be predominantly buried underground (with air valves and wash out valves above ground), they are unlikely to generate vibration or sound amplification. However, the applicant's attention to drawn to consultation responses in appendix 2 in relation to the potential that noise could be transported through the pipelines and that the assessment should not rely on damage to buildings as determining a significant effect but that the assessment should consider the potential for nuisance. The ES should address these issues and provide further justification in the ES before scoping this matter out of the assessment,

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.3	Para 14.6.3 Table 14-9	Vibration from pumps	The scoping report proposed to scope out this matter on the basis that the pumps will be designed to operate within design specifications to reduce vibration. Levels are expected to fall significantly below BSI 6472 criteria. Para 14.6.3 of the scoping report supports this by explaining that pumps will be installed on concrete bases (with anti-vibration mounts) and connected to pipes using flexible connectors. The applicant's attention is drawn to comments in ID 3.10.2 in relation to vibration. Furthermore, the ES should provide information on design, location and the proximity to sensitive receptors in relation to vibration risk. As such, the Inspectorate is currently not in a position to scope this matter out at this stage.

ID	Ref	Description	Inspectorate's comments
3.10.4	n/a	Figures	The ES should include figures showing the location of receptors considered in the assessment.
3.10.5	n/a	Methodology	The Inspectorate considers that predicted vehicle movements and details on the type, duration and location of plant on site should be used to inform a worst-case scenario for the assessment.
3.10.6	n/a	Monitoring locations	Monitoring locations for the noise and vibration assessment should be provided on a figure.
3.10.7	Section 14.2	Study area	The scoping report identifies different study areas depending on each phase of the proposed development (100m for direct impacts from construction vibration, 1km for operational noise). However, the scoping report does not state whether the different phases' study areas are subject to extension based on the results of assessment. The

ID	Ref	Description	Inspectorate's comments
			study areas should be based upon the location of receptors and the extent of likely significant effects. The applicant should seek to agree the study area with relevant bodies.
3.10.8	n/a	Ecological receptors	The Inspectorate notes that there is little reference to other receptor types that may be sensitive to noise and vibration, such as ecological receptors. The ES should include assessment of noise impacts on biodiversity receptors. The noise assessment should therefore cross-refer to those aspect chapters. The ES should clearly explain any assumptions made regarding the assessment of likely significant effects arising from noise and vibration on sensitive ecological receptors

3.11 Air Quality and Odour

(Scoping Report Chapter 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.11.2	Para 15.4.13	Guidance	The applicant's attention is drawn to the Defra advice 'PM2.5 Targets: Interim Planning Guidance'. The ES should explain how key sources of air pollution within the proposed development have been identified and how action has been taken to minimise emissions of PM2.5 or its precursors.
3.11.3	Paras 15.2.11 and 15.8.9	Odour assessment	The Inspectorate agrees that an assessment of effects from operational odour should be scoped into the assessment, as it considers the proposed development has potential to generate odour from the treatment of wastewater. Any justification to scope out this matter at a later date should include evidence of discussion and agreement with relevant bodies. The ES should provide estimates of the type and quantities of expected residues and emissions in line with Schedule 4 of the EIA Regulations. Please also refer to ID 2.5.7 of this Opinion for the Inspectorate's comments on potential for sludge generation.
3.11.4	Figure 15-1	Recognition of Broads Authority	The Broads Authority in its consultation response noted that its jurisdiction is not clearer identified on sheet 3 of 14 and 4 of 14.

3.12 Climate Change

(Scoping Report Chapter 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.12.1	Paras 16.6.1 to 16.6.3 Table 16-9	Global atmosphere (enabled development indirect emissions) – operation and decommissioning	The scoping report proposes to scope out this matter on the basis that the water produced by the proposed development has a multiplicity of uses, which means there is no certainty as to the nature of such enabled development and any resulting emissions. The Inspectorate notes that there is potential for multipole uses for the water from the proposed development. At this stage there is limited information, however, on the link between the proposed development and SZC or its component parts. As such, as further information becomes available for the design, the approach to this matter should be reviewed in the ES.
3.12.2	Paras 16.6.4 to 16.6.7 Table 16-9	Global atmosphere (emit GHG's during decommissioning) – operation and decommissioning	The scoping report proposes to scope out this matter on the basis that the design life of the proposed development is assumed to be a minimum of 80 years, and hence the emissions and climate vulnerability impacts associated with end-of-life stages are considered to be highly uncertain at that stage. The scoping report proposes to incorporate mitigation in the form of Circular Design Principles to improve resource efficiency and design out waste, hence reducing waste during the decommissioning phase and as a result GHG emissions. The Inspectorate agrees to scope this matter out.
3.12.3	Paras 16.6.4 to 16.6.7	Climate vulnerable receptors: decommissioning workers, infrastructure, landscaping/planting	The scoping report proposed to scope out this matter for Greenhouse Gas (GHG) emissions and Climate Change Risk Assessment (CCRA) on the basis that the design life of the proposed development (which is assumed to be a minimum of 80 years) and emissions and climate vulnerability impacts associated with end-of-life stages are

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Table 16-9	(health and safety, delays to decommissioning programme) – decommissioning	considered to be highly uncertain at this stage. The Inspectorate agrees to scope this matter out.

ID	Ref	Description	Inspectorate's comments
3.12.4	Para 16.8.19	UKCP18 climate projections	The scoping report proposes that UKCP18 climate projections will cover the construction and operational phases of the proposed development. It is noted that UKCP18 is limited to the projection period up to 2100, however paragraph 16.8.19 explains that the proposed development will be operated beyond the year 2100. The ES should establish how impacts from climate beyond 2100 will be presented if the proposed development is planned to continue past this point.
3.12.5	n/a	Wildfires	Noting the wildfires within the location of the proposed development this summer, the Inspectorate consider that this matter should be discussed with relevant bodies as part of the ES in relation to reference to the climate change assessment.

3.13 Socio-economics

(Scoping Report Chapter 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	Para 17.6.1 Table 17-25	Jobs and employment – operation	The scoping report proposed to scope out this matter on the basis that the number of jobs supported once the proposed development is operational is anticipated to be limited and much of the operation of the proposed development would be automated, relying on advanced monitoring and control systems rather than a large on-site workforce. Suffolk County Council in its consultation response however considers that there is a potential for significant beneficial effects and therefore this matter should be scoped in. The Inspectorate suggests that on this basis that this matter should be discussed further with relevant bodies. Furthermore, the ES should clarify employment numbers for all phases of the proposed development to justify scoping this matter out.
3.13.2	Para 17.6.2 Table 17-25	Skills and labour market – operational phase	This matter is proposed to be scoped out on the basis that, as noted in ID 3.13.1, operational job and employment opportunities are anticipated to be limited and therefore operational effects on skills and labour market are anticipated to not be significant. The Inspectorate agrees that matter can be scoped out of the assessment on that basis.
3.13.3	Para 17.6.3 to 17.6.4 Table 17-25	Business enterprises (maritime) – operational phase	This matter is proposed to be scoped out on the basis that socio-economic effects on maritime businesses are anticipated to be limited and confined to the immediate vicinity of the proposed offshore LSO infrastructure. It is stated in the scoping report that navigational risks arising from the presence and operation of the LSO (Option 1) are anticipated to be manageable and as low as reasonably practicable (ALARP) compliant, subject to standard mitigation measures and stakeholder engagement. The Inspectorate agrees to scope this matter out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			No significant effects are expected on commercial fisheries due to displacement of fishing activity as this would be expected to be minor and localised in the vicinity of the infrastructure. The scoping report, however, does not provide enough information at this time to identify the scale of any potential impacts from the proposed development on commercial fisheries. In the absence of this information or evidence demonstrating clear agreement with relevant bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment at this time. The ES should include an assessment of these matters or the information referred to justifying the approach or demonstrating agreement with the relevant statutory bodies and the absence of an LSE.
3.13.4	Para 17.6.5 to 17.6.6 Table 17-25	Tourism – operational phase	This matter is proposed to be scoped out during the operational phase on the basis that the operational workforce is anticipated to be limited and not expected to require local accommodation hence no significant effects are anticipated. Significant beneficial effects are not anticipated as the proposed development would not be introducing new opportunities for tourism. The Inspectorate is content to scope this matter out in relation to availability of accommodation and opportunities for tourism. The Inspectorate notes however that tourism impacts are wider than this. The ES should include consideration of all effects on tourism including those associated with tourist attractions/assets where likely significant effects could occur.

ID	Ref	Description	Inspectorate's comments
3.13.5	n/a	Crime, safety and security	The scoping report does not reference crime, safety or security. The ES should set out whether the characteristics of the proposed development are likely to have any significant effects on crime, safety and security on areas within which it is located or for people using those areas. The ES should assess the impact of this or provide justification if it proposes to scope this matter out. The ES should explain how any required security measures are

ID	Ref	Description	Inspectorate's comments
			secured within the dDCO and, where possible, demonstrate agreement with relevant statutory bodies and operators of those security areas.
3.13.6	Paras 17.3.1 17.8.2 to 17.8.5	Methodology	Paragraph 7.3.1 states that no topic-specific engagement and consultation in relation to socio-economic considerations has been undertaken to date. The applicant should make effort to agree the approach of the study area, baseline, assessment and cumulative developments with the relevant bodies.

3.14 Human Health

(Scoping Report Chapter 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Para 18.5.2 Table 18-33	Health related behaviours - physical activity, risk-taking behaviour, diet and nutrition (all phases)	This matter is proposed to be scoped out for all phases on the basis that there no direct or material population-level causal pathways that have been identified linking the proposed development to changes in behaviours such as physical activity, diet, or substance use, beyond those already captured under other 'determinants', which the Inspectorate has understood to mean aspect chapters. The Inspectorate agrees on this basis that these matters can be scoped out of the assessment, noting that sufficient cross-referencing in the ES should be provided to ensure a robust assessment.
3.14.2	Paras 18.5.8 to 18.5.10 Table 18-33	Economic environment - education and training and employment and income (operational and decommissioning phases)	Education and training are proposed to be scoped out of the operational and decommissioning phases on the basis that the proposed development is not expected to generate a substantial number of education and training opportunities. It is proposed that the Outline Skills and Employment Plan (OSEP) would be submitted with the dDCO application. However, effects during the operational and decommissioning phase are expected to be negligible due to the limited and short-term nature of employment opportunities during these phases and hence would not give rise to significant effects. East Suffolk Council consider that the proposed development has the potential to give rise to significant beneficial effects on local businesses. The Inspectorate agrees that this matter can be scoped out of the assessment however encourages the applicant to consider the potential for significant beneficial effects to local businesses further.
3.14.3	Para 18.5.11	Bio-physical environment – land quality and radiation (operational and	Land quality is proposed to be scoped out on the basis that the topic would be considered in the agricultural land and soils chapter of the ES, with limited additional human health impacts. Furthermore, radiation is scoped out on the basis of the nature of the proposed

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	Table 18-33	decommissioning phases)	development. The Inspectorate agrees on this basis that these matters can be scoped out of the assessment.
3.14.4	Para 18.5.12 Figure 18-7 Table 18-33 Figure 18-7	Institutional and built environment - health and social care services and built environment (operational and decommissioning phases)	This matter is proposed to be scoped out on the basis that both health and social care services and built environment facilities identified in scoping report figure 18-7 are not considered to have likely significant effects due to the lack of causal pathways between the proposed development and the receptors considered. However, figure 18-7 shows a number of health services and built environment receptors located within the study area, which could lead to possible LSE on these services. Furthermore, Suffolk County Council in its consultation response have noted that with uncertainty in relation to the need to remove sludge and chemical deliveries, that this matter should be scoped in. Based on the information provided, the Inspectorate is not in a position to agree to scope these matters from the assessment at this time.
3.14.5	Para 18.5.3 Table 18-33	Social environment – housing and relocation (all phases)	Relocation is proposed to be scoped out of all phases on the basis that no individual properties are expected to be demolished as part of the proposed development and therefore significant effects relating to displacement or loss of housing are not anticipated. Figure 18-4 shows properties located within and adjacent to the proposed development's red line boundary. East Suffolk Council in its consultation response consider that this matter should be scoped in for the construction phase. Considering the location of properties to the proposed development, the Inspectorate does not agree to scope this matter out at this time. The ES should provide further information to justify no likely significant effects for each phase of the proposed development and where possible, agreement with relevant bodies to enable this matter to be scoped out.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.6	Table 18-33	Social environment – community identity, culture, resilience and influence, social participation, interaction and support (operational and decommissioning phase)	Community identity, culture, resilience and influence, social participation, and interaction and support are proposed to be scoped out on the basis that any effects on community cohesion, participation, or social networks are expected to be temporary and primarily associated with the construction phase. The Inspectorate agrees that this matter can be scoped out for the operational phase. The ES however should set out how the effects at decommissioning are different to those during construction to enable this matter to be scoped out for decommissioning.
3.14.7	Table 18-33	Social environment – housing, community safety, and transport modes and connections (decommissioning phase)	Housing, community safety, and transport modes and connections is proposed to be scoped out of the decommissioning phase on the basis that decommissioning activities are not expected to result in likely significant effects on these determinants. The scoping report however is unclear as to whether pipelines are to be removed or left in situ. As such, the Inspectorate is unable to agree to scope this matter out at this time. The ES should set out the potential works required for decommissioning and justify that significant effects are not likely to enable this matter to be scoped out. Agreement on this matter should be sought from relevant bodies.
3.14.8	Paras 18.5.4 to 18.5.7 Table 18-33	Maritime Navigation – operational and decommissioning phase	This matter is proposed to be scoped out on the basis that impacts on maritime navigation from the proposed LSO component during the operational phase are anticipated to be minimal. It is stated that the proposed LSO component (option 1) is not expected to require ongoing exclusion zones or materially alter established navigation routes for commercial or recreational users, which means recreational activities are expected to continue largely unchanged. Furthermore, from a health and wellbeing perspective, no pathways to impact are identified and access to recreational waters, user experience, and opportunities for physical activity and social interaction are expected to be maintained. During the proposed development's decommissioning phase, the LSO component is anticipated to be remain in

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			situ and therefore is not expected to introduce additional navigation or access impacts. The Inspectorate agrees on this basis that these matters can be scoped out of the assessment.

ID	Ref	Description	Inspectorate's comments
3.14.9	Para 18.5.1 18.5.3 Table 18-33	Relocation (social environment) – Construction phase	Paragraph 18.5.3. of the scoping report states that relocation (under social environment) would be scoped out of the construction phase assessment (see ID 3.14.1), however paragraph 18.5.1 and table 18-33 have noted that this topic has been scoped into the assessment. The ES should be consistent with what is proposed to be scoped in or scoped out of the ES and in the summary tables.
3.14.10	n/a	Suffolk County Council	Suffolk County Council raise a number of locationally specific matter in relation to public health that the applicant is encouraged to discuss further and provide evidence of agreement to the approach taken in the ES where possible.

3.15 Ground Conditions

(Scoping Report Chapter 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.1	Para 19.6.1 and table 19.8	Disturbance and mobilisation of existing contamination – operation and decommissioning	The scoping report proposes to scope out this matter on the basis that where existing contamination is identified, this would be addressed during the construction phase in accordance with the Environment Agency's Land Contamination Risk Management Guidance. The Inspectorate does not agree to scope this matter out from the decommissioning phase due to lack of certainty on the proposed activities. Scoping report paragraph 2.6.2 details that decommissioning is anticipated to involve removal of the AWRP, CSR and Western Service Reservoir (WSR) with excavation associated with the foundations. This has the potential to disturb contaminated Made Ground or impacted soils. In addition, there is uncertainty around whether pipelines will remain in situ or may be removed. If removed this could create a pathway for disturbance of contaminated soils and groundwater. The ES should therefore provide sufficient certainty around decommissioning activities in order to fully understand the likelihood of disturbance/ mobilisation of contamination.
3.15.2	Para 19.6.2 and table 19.8	Discovery of unexpected contamination – operation and decommissioning	The scoping report proposes to scope out this matter on the basis that any unexpected contamination which could adversely affect human health or contaminate controlled waters would be dealt with during the construction phase. It is proposed that this would be controlled through the implementation of a remediation strategy and verification plan. With reference to ID 3.15.1 of this opinion, the Inspectorate considers that this matter should not be scoped out of the operational or decommissioning phases. It is considered that contamination from operational activities could be mobilised during decommissioning and as such the ES should contain an assessment of LSE and detail

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			any proposed avoidance and mitigation measures to be applied. The applicant's attention is also drawn the Environment Agency's response in appendix 2 of this opinion in this regard.
3.15.3	Paragraph 19.6.3 - 19.6.4 and table 19.8	Damage to construction materials from contamination or aggressive ground conditions – all phases	The scoping report proposes to scope out this matter on the basis that chemical data would be obtained as part of ground investigation works and used to inform concrete design and selection of pipe materials. This will be in accordance with Building Research Establishment (BRE) and UK water industry research guidance. In the event that aggressive ground conditions are identified, the scoping report states that this would be appropriately dealt with during the design phase and implemented during the construction phase. The Inspectorate is content that this matter can be scoped out of the assessment on that basis.
3.15.4	Paragraph 19.6.5 - 19.6.6 and table 19.8	Damage to infrastructure or third-party assets from site-specific ground instability/ geohazards – all phases	The scoping report proposes to scope out this matter on the basis that the baseline conditions assessment identified no ground stability/ geohazard issues. The exception is the proposed siting (in all options) of the LSO, due to the coastline location. Long term cliff instability and coastal erosion have been identified as a risk. The scoping report states that intrusive investigations at this location would inform appropriate design solutions. This may include directional drilling set back from the retreating cliff face to avoid exposure for the intended design life. The Inspectorate considers that additional information on ground stability and geohazards is required to confirm the findings of the desk-based ground conditions assessment noting there are authorised landfill sites and watercourses within the study area. The ES should assess the potential LSE from ground instability/ geohazards during construction and decommissioning and the Inspectorate does not agree therefore that this matter can be scoped out of the assessment at this stage.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.15.5	Para 19.6.7 and Table 19-8	Damage to designated sites of geological importance (SSSI) – all phases	The scoping report proposes to scope out this matter on the basis that there is just one SSSI identified within the 250m study area. Leet Hill Kirby Cane SSSI is however identified on figure 19.3 (sheet 4 of 14) within the proposed AWRP to River Waveney pipeline section. The site is considered of important geological interest as it provides important sections through a sequence of Middle Pleistocene deposits. The sedimentary structures are considered to be in good condition and have the potential to be used for future geological research. The Inspectorate also notes reference to designated geological sites within scoping report chapter 9. An assessment of both direct and indirect effects should therefore be included in the ES, which should confirm the location of geologically important SSSIs in relation to the proposed development.

ID	Ref	Description	Inspectorate's comments
3.15.6	Para 19.2.1 Figure 19.1	Study area	The scoping report details that the search area relating to ground conditions would be the scoping area plus a 250m radius, as depicted in figure 19.1. The applicant's attention is directed towards comments from the Environment Agency in appendix 2 of this opinion. This recommends that the study area is increased to a 500m from the scoping area to take account of the secondary and principal aquifers which give rise to potential contamination to be mobilised beyond the 250m radius.
3.15.7	Table 19-4	Groundwater abstraction	Table 19-4 details one groundwater abstraction point within the proposed LSO study area. It is acknowledged that there may also be private water supply abstraction points and information on this will be requested from the relevant local planning authority. The applicant's attention is drawn to comments from Anglian Water in this regard. Any

ID	Ref	Description	Inspectorate's comments
			potential impacts on groundwater abstraction should be assessed with mitigation measures as required to be identified in an appropriately secured CEMP.

3.16 Agricultural Land and Soils

(Scoping Report Chapter 20)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Para 20.6.2 and Table 20-5	Disturbance to soil structure and agricultural function – operational phase	The scoping report proposes to scope out this matter on the basis that during the operational phase, buried pipeline components, above ground fittings such as air valves and wash out valves and other infrastructure associated with the proposed development are not anticipated to have a discernible impact on soil structure and agricultural function. While the Inspectorate acknowledges that the approximate three-year construction period would not constitute a long-term disruption to agricultural production, sustained effects on Best and Most Versatile (BMV) land arising from construction activities, such as soil compaction and erosion, may extend beyond the construction phase. The ES should therefore assess the potential for such effects to influence the ability of land to return to its former agricultural use in operation and should consider the timescale for full reinstatement and any consequential reduction in agricultural productivity.
3.16.2	Para 20.6.3 Table 20-5	Permanent or temporary land take – operational and decommissioning phase	The scoping report proposes to scope out this matter on the basis that permanent or temporary land take associated with the proposed AWRP, CSR and WSR will only take place as part of the construction of the proposed development with no further impacts during operation or decommissioning. As there will be no additional land take during the operational or decommissioning phases, the Inspectorate is content to scope this matter out as assessed for the construction phase.
3.16.3	Paras 20.6.4 and 20.6.5	Disturbance of soils supporting habitats –	The scoping report proposes to scope out this matter for all above and below ground infrastructure on the basis that maintenance activities are expected to be infrequent, temporary and highly localised. As there will be minimal disturbance of soils during the operational phase, the Inspectorate is content to scope this matter out where the scale

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
	and Table 20-5	operational/ maintenance phase	and nature of maintenance activities are confirmed in the ES to result in minimal disturbance during the operational phase.
3.16.4	Para 20.6.6 and Table 20-5	Loss of soil carbon – operational phase	The scoping report proposes to scope out loss of soil carbon in the operational phase on the basis that any disturbance to carbon storage within soil would occur during the construction phase. Table 9-37 references the potential for groundwater level/ recharge changes during the operational phase. The applicant's attention is drawn to comments from the Environment Agency in appendix 2 of this opinion. Any change in groundwater levels may lead to oxidation and loss of peaty soils. The Inspectorate considers that an assessment of this should be presented within the ES, therefore and cannot be scoped out at this stage.
3.16.5	Para 20.6.7 to 20.6.8 and Table 20-5	Permanent disruption to agricultural land use from operational/ maintenance activities	The scoping report proposes to scope out this matter on the basis that any agricultural land that is subject to temporary disturbance during construction is expected to be reinstated and returned to its baseline agricultural use. The Inspectorate does not agree to scope this matter out from further assessment, with reference to ID.3.16.1 above.

ID	Ref	Description	Inspectorate's comments
3.16.6	Para 20.6.6	Soil management plan	The Environment Agency recommends that the soil management plan should contain specific provisions for the identification, handling, protection, storage, and reinstatement of peat soils if its disturbance cannot be avoided through project design. A standalone peat management plan should therefore be considered where significant effects on peat deposits are likely to occur.

ID	Ref	Description	Inspectorate's comments
3.16.7	Para 20.3.1	Agricultural Land Classification (ALC)	The ES should contain a clear tabulation of the areas of land in each BMV classification to be temporarily or permanently lost as a result of the proposed development, with reference to accompanying map(s) depicting the grades. Specific justification for the use of the land by grade should be provided. Efforts should be made to avoid and minimise temporary and permanent loss of BMV land as much as is possible. Consideration should be given to the use of BMV land in the applicant's discussion of alternatives.

3.17 Materials and Waste

(Scoping Report Chapter 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.17.1	Para 21.6.3 to 21.6.7 and Table 21-15	Allocated mineral sites – all phases	The scoping report proposes to scope out allocated mineral sites on the basis that construction of the proposed development is not expected to result in permanent land take within or adjacent to allocated mineral sites. It is noted that the study area corresponds to the area where materials would be consumed and allocated mineral sites could be sterilised. Scoping report para 21.4.8 details that a review of relevant published material, including a review of local plan policy maps confirms that there are no allocated mineral sites within the EIA scoping area. Para 21.6.7 of the scoping report details engagement with both Suffolk County Council (SCC) and Norfolk County Council (NCC) and states that consultation has confirmed that terrestrial mineral safeguarding can be scoped out of the ES. This is on the condition that this matter is addressed appropriately within the dDCO application through the provision of a standalone mineral resource assessment. On that basis, the Inspectorate agrees that significant effects on not likely, subject to the proposed development not interacting with safeguarded allocated minerals sites and where this is secured through the dDCO.
3.17.2	Para 21.6.14 to 21.6.20 and Table 21-15	Materials consumption and waste generation – operation (excluding effluent stream)	The scoping report proposes to scope out significant effects from material consumption and waste generation on the basis that quantities are expected to be negligible and as such are not expected to give rise to LSE. Whilst operational good practice measures, including the implementation of the waste hierarchy and circular economy approaches are outlined in section 21.7, there is currently no quantification of material consumption and waste generation presented

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			within the scoping report. It is noted that a site waste management plan would be implemented. The proposed development would include the operation of the AWRP that will run for 24 hours a day, 7 days a week, generating a residual waste stream and requiring ongoing delivery and consumption of chemicals. Table 16.6 of the climate change chapter recognises the greenhouse gas emissions associated with operational material use, which includes the use of chemicals and waste generation associated with wastewater treatment. Accordingly, the Inspectorate considers that an assessment of these matters should be presented within the ES and cannot be scoped out of the assessment at this stage.
3.17.3	Paras 21.6.23 and 21.6.24	Waste associated with the decommissioning phase	The scoping report proposes to scope out this matter on the basis that full details on anticipated decommissioning activities will be included within the ES, with all activities following the statutory process in place at the time. The Inspectorate acknowledges that a detailed Decommissioning Environmental Management Plan (DEMP) would be agreed with the relevant authority prior to the commencement of the decommissioning phase. but does not agree to scope this matter out of the assessment at this stage.

ID	Ref	Description	Inspectorate's comments
3.17.4	n/a	Waste arisings	The ES should include an estimate of expected waste arisings produced during the construction and operational phases. This should include the predicted volume and composition of waste arising from pipeline laying and any excavation required to facilitate the construction of the CSR and WSR. The scoping report indicates that for most of the underground pipeline installation, open cut trenching would be used with a cut and fill balance and some trenchless methods

ID	Ref	Description	Inspectorate's comments
			used to cross roads, railway, waterbodies and some environmentally sensitive areas. The ES should confirm the predicted volume of soil excavated from these components and any shortfall or remainder from the fill.

3.18 Major Accidents and Disasters

(Scoping Report Chapter 22)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.18.1	Table 22-5	Natural Hazards – • earthquakes • tsunamis/ tidal waves • volcanic activity • avalanche • tropical storms (including cyclones/ hurricanes) • sandstorms	The scoping report proposes to scope out a range of natural hazards from assessment within the ES. Scoping report Table 22-3 provides information on why these natural hazards are unlikely to occur. On the basis of the information provided, the Inspectorate agrees that these matters can be scoped out of further assessment.
3.18.2	Table 22-5	Natural Hazards - • landslides	The scoping report proposes to scope out landslides during operation on the basis that the study area is generally flat with gently undulating land. In addition, British Geological Society data indicates negligible landslide risk. The Inspectorate agrees that this matter may be scoped out for the operational phase of the proposed development.
3.18.3	Table 22-5	Natural Hazards - • wildfires	The scoping report proposes to scope out wildfires on the basis that there is a low likelihood of wildfires in East Anglia. There is stated to be a minor risk near dry grasslands during drought; heath/grass fires present limited fuel continuity, moisture

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			content is higher than in arid climates and landscape fragmentation (fields, roads, hedgerows) breaks up fire spread. The Inspectorate considers that this does not take account of the wildfire on Dunwich Heath in 2026. Please refer to comments from Thrandeston Parish Council in appendix 2 of this opinion in this regard. The Inspectorate considers that the risk of wildfires should be scoped into assessment within the ES.
3.18.4	Table 22-5	Natural Hazards - • droughts	The scoping report proposes to scope droughts on the basis that part of the proposed development's purpose is to increase drought resilience. Also, that drought does not present an accident/ disaster scenario and drought risk is managed through strategic water resource planning. The Inspectorate is content to scope this matter out of further assessment on that basis.
3.18.5	Table 22-5	Biological - • animal/ insect infestation	The scoping report proposes to scope out animal / insect infestation on the basis that animal/ insect infestation is only of minor relevance. The scoping report acknowledges that infestation could affect construction compounds and as such is a minor operational nuisance only and therefore it is not stated to be a Major Accident and Disaster (MA&D) risk. Given the details available on the design and therefore uncertainty on whether the proposed development could give rise to animal or insect infestation (such as from treatment processes), the Inspectorate does not agree that this matter can be scoped out of the assessment at this stage.
3.18.6	Table 22-5	Biological - • INNS	The scoping report proposed to scope out this matter on the basis that there is not a credible pathway for spread of INNS to create a major accident or disaster involving the proposed development's components. The Inspectorate is in agreement that the risk of

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			INNS spread to lead to a major accident or disaster can be scoped out of assessment. This is on the basis that risks associated with the spread of INNS will be appropriately assessed and reported within the terrestrial, freshwater and marine biodiversity technical chapters of the ES. As identified within the scoping report, appropriate avoidance and mitigation measures may be used, which would include the implementation of an INNS biosecurity protocol to prevent the introduction and spread of INNS.
3.18.7	Table 22-5	Societal – • pandemics and epidemics • large scale migration or displacement of population • social care system failures • civil unrest, strikes	The scoping report proposes to scope out a range of potential societal events from assessment within the ES. • pandemics and epidemics - on the basis that primary effects are workforce availability and logistics with no direct major-accident pathway to assets. This will be managed under corporate procedures/ business continuity planning and so is not a project-specific MA&D risk. • large scale migration or displacement of population - on the basis that this is outside of MA&D scope because it is a socio-economic consideration, not an accident/ disaster consideration. • social care system failures - on the basis that it is a governance/ service delivery issue, not a hazard to physical infrastructure. Social care and system failures affect societal resilience, not infrastructure safety or operational continuity in a way that triggers catastrophic events. • civil unrest, strikes - on the basis that whilst there is a potential to delay works or disrupt workforce availability it would not create environmental accident scenarios. This may disrupt construction activities and delay emergency response. Contingency planning measures would be included in the contractor's

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			construction-stage management arrangements/plans and the Applicant's operational continuity and emergency response procedures. The Inspectorate agrees that these matters can be scoped out of further assessment, therefore.
3.18.8	Table 22-5	Aviation – aircraft crash onto assets	The scoping report proposes to scope out this matter on the basis that there is an extremely low likelihood given asset locations outside of flight paths and airfields and no historical precedent indicating a credible pathway. The Inspectorate considers that the impacts are of low probability and thus not likely to result in significant effects. These matters can be scoped out of the ES.
3.18.9	Table 22-5	Maritime • offshore shipping collision unrelated to the proposed development	The scoping report proposes to scope out this matter on the basis that where offshore or nearshore works are required, maritime navigation risks would be assessed through a Navigation Risk Assessment (NRA) submitted in support of the dDCO. The Inspectorate considers that where adequate mitigation can be secured through the Navigation Risk Assessment to rule out LSE, this matter can be scoped out of assessment within the ES. The applicant's attention is drawn to comments from Trinity House and the Maritime and Coastguard Agency (MCA) with regard to the NRA in appendix 2 of this opinion. For any works below the mean high-water springs, the MCA would expect an NRA to be undertaken proportionate to the scale of works. The NRA would establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). The navigation baseline should draw on current vessel traffic data, nautical charts and relevant publications. This evidence should inform the assessment of navigational effects during and after installation of the outfall, including effects on identified impact pathways and local vessel operations. The

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			NRA should include an under-keel clearance desktop study to assess the proposed works on vessels transiting the area.
3.18.10	Table 22-5	Engineering accidents and failures – • structural or building collapse during dismantling	The scoping report proposes to scope out this matter on the basis that it is controlled by standard demolition risk management and is therefore not an unpredictable disaster scenario. The Inspectorate agrees that this matter can be scoped out of assessment within the ES.

ID	Ref	Description	Inspectorate's comments
3.18.11	n/a	Emergency access and preparedness	The ES should assess relevant construction and operational risks associated with fire, flooding, loss of containment, confined-space incidents and incidents at remote or difficult-to-access locations. Attention is drawn to the response from East of England Ambulance Service in this regard.
3.18.12	n/a	Hazardous chemicals	The scoping report does not include information on the hazard classification of any chemicals that are proposed to be used for the proposed development, such as for water treatment purposes. Depending on the nature of the chemicals to be used, their hazard classification should therefore be considered and an assessment for potential accidents assessed in the ES.
3.18.13	Table 22-4	Reservoirs / uncontrolled release	The assessment of risk associated with reservoir breaches or failures should include a reservoir and dam failure assessment. The applicant's attention is drawn to the Environment Agency's response in this regard.

3.19 Cumulative effects

(Scoping Report Chapter 23)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.19.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

ID	Ref	Description	Inspectorate's comments
3.19.2	Para 23.1.3	Intra-project effects	The scoping report states that professional judgement would be used to identify potential intra-development cumulative effects that could occur across aspects. The ES should set out the methodology for the assessment of cumulative effects on individual receptors in combination with other environmental aspects, in particular how the sensitive receptors would be selected.
3.19.3	Figure 23-2	Location plan of projects	The ES should include figure(s) showing the boundaries of projects on or near the proposed development assessed within the cumulative effects assessment.
3.19.4	Appendix 23.1	List of developments	The scoping report identifies the proposed search parameters for cumulative projects. In addition to the parameters listed, the following projects should also be considered (as relevant) in the ES: • planning permissions and DCOs that are older than 5 years if there is evidence that these could have been subject to a longer implementation period or are multi-phase projects where later construction phases could coincidence with the proposed development. • refused planning applications that are subject to appeal procedures not yet determined.

ID	Ref	Description	Inspectorate's comments
3.19.5	Paras 23.3.1 23.3.2	Engagement/Consultation	Para 23.3.1 states that the 'long-list' of cumulative schemes was sent to the relevant planning authorities for comment and agreement. The Inspectorate recommends that the short-list is also agreed with these bodies. Any omissions or inclusions should be clearly justified and explained with reference to PINS Advice Note 17: Cumulative effects assessment. Evidence of any consultation and/or agreement should be provided as part of the application documents. The Inspectorate also recommends that other relevant bodies (including Natural England, the Environment Agency and for plans/ projects in the marine area, the Marine Management Organisation) should also be consulted to ensure that the list of other development identified for inclusion in the cumulative effects assessment is comprehensive and accurate. Furthermore, para 23.3.2 states that feedback provided from engagement with the LPAs were included in the appendix 23.1, however this is missing. The ES should include any feedback or consultation provided by any relevant statutory body.
3.19.6	n/a	Projects within the cumulative effects assessment	The applicant's attention is drawn to the responses of Suffolk County Council, Eye Parish Council, Benhall and Sternfield Parish Council and Great Yarmouth Borough Council for details of additional projects that should be considered in the cumulative effects assessment.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Belton with Browston Parish Council
	Bradwell Parish Council
	Fritton and St. Olaves Parish Council
	Hopton-on-Sea Parish Council
	Scole Parish Council
	Aldeby Parish Council
	Wheatacre Burgh St Peter Parish Council
	Loddon Town Council
	Haddiscoe Parish Council
	Brockdish Parish Council
	Ditchingham Parish Council
	Broome Parish Council
	Kirby Cane & Ellingham Parish Council
	Hales & Heckingham Parish Council
	Geldeston Parish Council
	Gillingham Parish Council
	Toft Monks Parish Council
	Thurlton Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Great Glemham Parish Council
	Snape Parish Council
	Benhall and Sternfield Parish Council
	Knodishall Parish Council
	Aldringham cum Thorpe Parish Council
	Framlingham Town Council
	Dennington Parish Council
	Badingham Parish Council
	Bruisyard Parish Council
	Kelsale cum Carlton Parish Council
	Cratfield Parish Council
	Huntingfield Parish Council
	Sibton Parish Council
	Yoxford Parish Council
	Cookley and Walpole Parish Council
	Bramfield and Thorington Parish Council
	Theberton and Eastbridge Parish Council
	Leiston-cum-Sizewell Town Council
	Middleton-cum-Fordley Parish Council
	Westleton Parish Council
	Wenhaston with Mells Hamlet Parish Council
	Sweffling Parish Council
	Farnham with Stratford St Andrew Parish Council
	Saxmundham Town Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Saxtead Parish Council
	Rendham Parish Council
	Peasenhall Parish Council
	Ubbeston Parish Council
	Heveningham Parish Council
	Chediston and Linstead Parish Council
	Lowestoft Town Council
	Wissett Parish Council
	Ilketshall St Lawrence Parish Council
	Ilketshall St Andrew Parish Council
	Bungay Town Council
	Carlton Colville Town Council
	Oulton Parish Council
	Somerleyton, Ashby and Herringfleet Parish Council
	Corton Parish Council
	Rumburgh Parish Council
	Halesworth Town Council
	Holton Parish Council
	Spexhall Parish Council
	Westhall Parish Council
	All Saints and St Nicholas, St Michael and St Peter South Elmham Parish Council
	Flixton, St Cross South Elmham and St Margaret South Elmham Parish Council
	Ringsfield and Weston Parish Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Gisleham Parish Council
	Mettingham Parish Council
	Barsham and Shipmeadow Parish Council
	Worlingham Parish Council
	Beccles Town Council
	North Cove Parish Council
	Barnby Parish Council
	Oulton Broad Parish Council
	Blundeston and Flixton Parish Council
	Lound Parish Council
	Hoxne Parish Council
	Haughley Parish Council
	Wetherden Parish Council
	Great Ashfield Parish Council
	Walsham-le-Willows CP
	Rickinghall Inferior and Rickinghall Superior Parish Councils
	Mendlesham Parish Council
	Cotton Parish Council
	Thorndon Parish Council
	Finningham Parish Council
	Gislingham Parish Council
	Occold Parish Council
	Eye Town Council

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Denham Parish Council
	Wilby Parish Council
	Stradbroke Parish Council
	Brome and Oakley Parish Council
	Syleham Parish Council
	Fressingfield Parish Council
	Laxfield Parish Council
	Metfield Parish Council
	Old Newton with Dagworth and Gipping Parish Council
	Bacton Parish Council
	Wyverstone Parish Council
	Westhorpe Parish Council
	Wickham Skeith Parish Council
	Wortham and Burgate Parish Council
	Mellis Parish Council
	Yaxley Parish Council
	Thrandeston Parish Council
	Horham and Athelington Parish Council
	Worlingworth Parish Council
	Brundish Parish Council
	Palgrave Parish Council
	Wingfield Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England

SCHEDULE 1 DESCRIPTION	ORGANISATION
Natural England (Offshore Wind Farms)	Natural England (Offshore Wind Farms)
The Forestry Commission	East & East Midlands Forestry Commission
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England - - East of England
The Historic Buildings and Monuments Commission for England (known as Historic England) (Offshore Only)	Historic England
The Joint Nature Conservation Committee	Joint Nature Conservation Committee
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Maritime and Coastguard Agency - Regional Office	The Maritime and Coastguard Agency - South East England (Colchester Marine Office)
The relevant internal drainage board	Broads Internal Drainage Board
	East Suffolk Internal Drainage Board
	Waveney Lower Yare and Lothingland Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
Trinity House	Trinity House
The relevant Highways Authority	Norfolk County Council Highways Department
	Suffolk County Council Highways Department
	National Highways
The Civil Aviation Authority	Civil Aviation Authority
The Health and Safety Executive	Health and Safety Executive

SCHEDULE 1 DESCRIPTION	ORGANISATION
United Kingdom Health Security Agency, an executive agency of the Department of Health and Social Care	United Kingdom Health Security Agency
NHS England	NHS England

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

'Statutory undertaker' is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Police and Crime Commissioner for Norfolk
	Police and Crime Commissioner for Suffolk
The relevant ambulance service	East of England Ambulance Service NHS Trust
The relevant fire and rescue authority	Norfolk Fire and Rescue
	Suffolk Fire and Rescue
The relevant Integrated Care Board	NHS Norfolk and Suffolk Integrated Care Board
NHS England	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	National Highways Historical Railways Estate
Canal Or Inland Navigation Authorities	The Broads Authority
Dock and Harbour authority	Great Yarmouth

STATUTORY UNDERTAKER	ORGANISATION
	Lowestoft
Pier	Lowestoft Claremont
	Lowestoft South
Lighthouse	Trinity House
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
	Essex and Suffolk Water
	Independent Water Networks
	Northumbrian Water
	Leep Networks Water Ltd
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity generator with CPO Powers	Sizewell B (England) - EDF Energy Renewables Limited
	Progress Power Station (England) - Progress Power Limited
	The Sizewell C Project (England) - NNB Generation Company (HPC) Limited
	Derwyn (Wales) - Breach Farm Energy Storage Limited
	Great Yarmouth (England) - RWE Generation UK Public Limited Company
	Playters (England) - Breach Farm Energy Storage Limited
	Promens (England) - Lightsource 204 Limited
	Scroby Sands - RWE
	East Anglia Two Transmission Asset
	East Anglia One North Transmission Asset
	EcoPower Suffolk

STATUTORY UNDERTAKER	ORGANISATION
	East Pye Solar Farm
The relevant electricity distributor with CPO Powers	Eastern Power Networks Plc
	Advanced Electricity Networks Ltd
	AGR Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Grid Line Power Networks
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Sphere Energy Connect Ltd
	Stark Infra-Electricity Ltd

STATUTORY UNDERTAKER	ORGANISATION
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
The relevant electricity transmitter with CPO Powers	Diamond Transmission Partners Galloper Limited
	Greater Gabbard OFTO Plc
	National Grid Electricity Transmission Plc
	National Energy System Operator (NESO)
	SP Transmission Plc
The relevant electricity interconnector with CPO Powers	National Grid Interconnectors Limited
	National Grid Lion Link Ltd
	Tarchon Energy Ltd

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 56A OF THE PA2008

LOCAL AUTHORITY
Babergh District Council
Ipswich Borough District Council
Great Yarmouth Borough Council
South Norfolk District Council
Breckland District Council
Norwich City Council
East Suffolk District Council
North Norfolk District Council
West Suffolk Council
Mid Suffolk District Council

LOCAL AUTHORITY
Broadland District Council
Broads Authority - The Broads National Park
Cambridgeshire County Council
Norfolk County Council
Lincolnshire County Council
Essex County Council
Suffolk County Council

TABLE A4: THE MARINE MANAGEMENT ORGANISATION

Section 46(1)(b) of the PA2008 requires consultation with the Marine Management Organisation in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection 46(5).

ORGANISATION
The Marine Management Organisation

TABLE A5: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
Royal National Lifeboat Institution

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Babergh Mid Suffolk District Council
Beccles Town Council
Benhall and Sternfield Parish Council
Breckland District Council
Broads Authority
Bungay Town Council
Cadent Gas
Cambridgeshire County Council
Carlton Colville Town Council
Corton Parish Council
Dennington Parish Council
East of England Ambulance Service NHS Trust
East Suffolk Council
East & East Midlands Forestry Commission
EcoPower Suffolk
Environment Agency
Essex County Council
Eye Town Council
Framlingham Town Council
Fulcrum Pipelines Limited
Great Yarmouth Borough Council

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Health and Safety Executive
Heveningham Parish Council
Historic England
Hoxne Parish Council
Joint Nature Conservation Committee
Leiston-cum-Sizewell Town Council
Loddon Town Council
Lound Parish Council
Marine Management Organisation
Maritime and Coastguard Agency
National Gas
National Grid Electricity Transmission
National Highways
Natural England
NATS Safeguarding
Norfolk County Council
Northern Gas Networks
Playters (England) - Breach Farm Energy Storage Limited
Progress Power Station (England) - Progress Power Limited (Drax)
Royal Mail Group
Saxmundham Town Council
Sibton Parish Council
South Norfolk District Council
Sphere Energy Connect Limited
Suffolk County Council

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Tarchon Energy Limited
Thrandeston Parish Council
Trinity House
Ubbeston Parish Council
UK Health Security Agency
Water Management Alliance (Broads Internal Drainage Board (IDB), Waveney, Lower Yare & Lothingland IDB, and East Suffolk Water Management Board)
Wetherden Parish Council
Yaxley Parish Council

Anglian Water Services
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
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strategicgrowth@anglianwater.co.uk

PINS Reference: WA0210003

Our ref: Suffolk Water Recycling/Scoping Response

FAO: Claire Deery – Senior Environmental Advisor
By email: suffolkWRTS@planninginspectorate.gov.uk

1st October 2026

Dear Claire,

SUFFOLK WATER RECYCLING TRANSFER AND STORAGE PROJECT – SCOPING CONSULTATION – ANGLIAN WATER RESPONSE

Thank you for the opportunity to comment on the scoping consultation for the Suffolk Water Recycling Transfer and Storage project.

Anglian Water Services (AWS) is the statutory sewerage undertaker for the proposed project area, and this response is in our statutory capacity regarding water recycling centres (WRCs), water recycling assets, and the sewer network, as well as the related role of surface drainage.

Previously AWS have supplied written responses to the projects early consultation in Winter 2025 on the proposed Development Consent Order (DCO) application and the Preliminary Environmental Information Report (PEIR) and Environmental Statement (ES). This early consultation presented potential land parcels and pipeline corridors for feedback.

It is understood that this consultation proposes the preferred option boundaries shown on the 'indicative map for the SWRTS' which runs through the local authority areas of Mid Suffolk and East Suffolk but does not fully reflect the Environmental Impact Assessment (EIA) boundary or final designs of the project. For Context Anglian Water is the appointed sewerage undertaker only for this route. Water is supplied by Essex & Suffolk Water.

AWS works to support the construction and operation of nationally significant infrastructure projects (NSIPs) that are conducted in accordance with the Water Industry Act 1991. In view of the guidance in the National Policy Statements e.g. Overarching National Policy Statement for Energy (EN-1) (December 2025) and 2024 IAQM guidance15. AWS would expect the following points are assessed in the Environmental Impact Assessment (EIA) to set out how the project will be supplied with water and its wastewater managed; how water recycling and supply assets serving residents.

and business in the area will be protected; and how design has been altered to reduce the need for new infrastructure or the diversion of existing assets. This is relevant for the construction, operation, and de-commissioning stages (as applicable).

AWS will work with developers, including those constructing projects under the 2008 Planning Act, to ensure requests for alteration of sewers, and wastewater infrastructure are planned to be undertaken with the minimum of disruption to the project and customers. We would encourage on-going engagement to ensure that AWS and the developer have reached agreement on the approach to assets and connections in advance of the submission of the draft Development Consent Order (DCO) for examination.

AWS is uniquely linked to this Project, in respect of the supply of treated wastewater from our Lowestoft Water Recycling Centre (WRC), which will be further treated/polished through infrastructure proposed as part of this NSIP. Anglian Water and Essex & Suffolk Water have collaborated on this project and continue to do so, regarding the principle of utilising treated wastewater from our WRC and consider that we are sufficiently engaged on this aspect of the Project at this stage. Engagement on this aspect of the project continues, to clarify the details on this provision. It is anticipated that further details will be addressed through the Preliminary Environmental Impact Report (PEIR) and the Environmental Statement (ES) as the Project evolves.

The Project and Anglian Water Infrastructure

It is understood; the proposed development includes the construction, operation and decommissioning of an advanced recycling plant, new service reservoirs, and a network of pipelines to transfer recycled and drinking water across the region. This will receive up to 16 million litres of treated wastewater from Anglian Water's Lowestoft WRC to produce 11 million litres of purified recycled water.

AWS supports the need for the proposed EIA to ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case' scenario, so that the assessment of likely significant effects is robust.

It is acknowledged that due to the early stages of design and development of the project the precise locations of the advanced recycling plant, new service reservoirs, and pipelines; nature of infrastructure and construction methods are unable to be confirmed. This is to allow for the consideration of ongoing engineering development, changes arising from environmental surveys and assessment and engagement feedback for input into the final design.

AWS notes that the Preferred Options Announcement Document (Published July 2026) identifies that there will be instances whereby the project interacts with existing or proposed large scale projects along the route corridor. However, it lacks reference to the consideration of the existing utility infrastructure. AWS would therefore expect the next stages of the project (including the EIA) to include reference to any existing infrastructure managed and owned by AWS, and any provision of replacement infrastructure or requirements for new infrastructure.

AWS' own programme of projects for AMP8 (2025-30) should be included with the list of cumulative projects to be assessed in the EIA. Our Business Plan Our Plan 2025 to 2030 - PR24 references record investment and obligation during this next AMP period (2025-30) and through an ambitious Water Industry National Environment Programme (WINEP) as agreed with the Environment Agency as the environmental regulator.

This letter will address standard matters which Anglian Water would comment on as the appointed water and sewerage undertaker.

General Comments

There are existing AWS assets both above and below ground, which serve the surrounding businesses and communities. These include water recycling centres; water treatment works and sewer pumping stations. There are several water mains and sewers within the project area within the highway or its verges which link to these various settlements.

A high-level review of the preferred options corridor has identified the following interfaces with AWS assets.

- Advanced Water Recycling Plant (AWRP)
    - Preferred option 3.2 – No interfaces identified
    - Preferred Option 3.3 – Rising main (North of the parcel)
- Pipeline Corridor 1
    - Lowestoft Sewer Treatment Works
- Central Service Reservoir (CSR)
    - No interfaces identified
- Western Service Reservoir (WSR)
    - Rising main and sewer - Eye Road
    - WSR9 overflow pipe – rising main in the road
- AWRP to River Waveney Pipeline Corridor (3)
    - Rising main - Geldeston Road/Geldeston
    - Rising Main - Stripps Lane
    - Ellingham Braces Lane WRC just outside proposed order limits but need to consider AW access arrangements
- Barsham Water Treatment Works to CSR Pipeline Corridor (5)
    - Rising main - Halesworth Road - between Wissett and Halesworth
    - Rising mains - Halesworth Road - between Walpole Old Chapel and Halesworth
- CSR to WSR Pipeline Corridor (7)
    - LAFRSC - just outside proposed order limits (small sewage discharge) but need to consider AW access arrangements
    - Rising mains at Horham: Redlingfield Road and across fields, B1117 and across fields to Denham Street, The Street (B1117) and Cookley Road (B1117).
- CSR to Saxmundham Water Tower Pipeline Corridor (10+10A)
    - Rising main north of Yoxford Road - (NE of Sibton)
    - Rising main and sewers within Saxmundham (Lincoln Avenue, Seaman Avenue)

AWS are currently exploring several options to improve Hoxne WRC within the AMP8 period. Of the options being explored two have the potential to interface with the project to the East of Eye. It is recommended; the project team engage with AW on this matter as the application progresses through the next stages.

To reduce the need for diversions and the associated carbon impacts of those works, AWS's assets should be identified and mapped to establish interactions with the project with a view to designing the project to avoid impacts upon those assets. Where the project is likely to have a number of interfaces with our assets, we advise applicants to contact AWS to discuss provision of further technical/design assessments for clash detection, identification of potential diversions, and asset protection measures. AWS requires that the location and nature of our assets serving local communities have been identified and protected, during construction and operation of the project. This will help to ensure that the proposed order limits are suitable to accommodate such works and help de-risk the delivery programme for the project if any specific issues are identified at an early stage.

We recommend that the locations of our assets are initially identified from a desktop study of http://www.digdat.co.uk/ to establish the extent of our assets within the scheme's application boundary. These should be mapped to establish interfaces with assets and the scheme designed to avoid impacts upon those assets.

For land investigation questionnaires relating to Anglian Water's above ground assets and formal easements, you should contact our estates team on: awsestates@savills.com.

In addition, we strongly recommend that clash detection and asset assessment be undertaken by ourselves as early as possible and before the design fix. This ensures clarity, reduces risk, and supports the timely and efficient delivery of the project. We would not agree that a review of utilities plans is used to inform plans for proposed works prior to construction. Given the large number of NSIPs and other AWS projects being delivered in AMP8, there is a strong advantage to having upfront discussions with AWS in relation to our asset interfaces with the project.

Our National Infrastructure team is responsible for identifying AWS assets in relation to the DCO process. Early engagement is critical to ensure accurate assets data is captured and to avoid potential delays later in the project's lifecycle. Sharing data at an early stage enables timely clash detection and coordination. To support efficient assessment and integration into our systems, it would be helpful if any revised boundary/mapping is provided in Shapefile format so that we are able to update our records.

Engagement with us on the asset interfaces of the project can include:
- Clash detection and resolution.
- Early design and technical assurance.
- Asset protection and diversion planning.
- Coordination with Anglian Water investment schemes (current and planned).
- Review of red line boundary implications.

You will be assigned a single point of contact (myself) who will coordinate engagement across relevant teams, including the National Infrastructure Team. Discussions with AWS around project scope, timescales, and other key details will ensure that tailored, project-specific advice can be provided to help de-risk the delivery programme as the Project comes forward. Whilst, costs would be incurred to support project development and internal planning, this can be discussed further with the Applicant. This would provide a high-level desktop assessment of each interface between the project and AWS assets or projects, and will be dependent on project size, complexity, and requirement from the project. Typically, this includes input from both AWS Services and our delivery teams.

This process will also help to inform mitigation measures in the Construction Best Practice for underground pipelines, as well as any other environmental and traffic management plans. AWS will need to be a consultee set out in the Requirements of the DCO for the approval of these detailed management plans.

The project should seek to assess whether there are any diversion requirements, the appropriate method of pipeline installation (For Example; Open Cut or Trenchless), and suitable mitigation of thermal dispersion and contamination impacts from the construction and operation of underground pipelines, particularly around Source Protection Zones.

AWS considers that where there are interfaces between the project and AWS assets, a AWS's bespoke Protective Provisions Agreement will be required and included within the draft DCO. As a starting point, AWS requires that the following standoff distances are applied for working each side of the medial line of AWS pipes where construction works are undertaken. This information is extracted from our Protective Provisions template - copy attached.

(a) 4 metres where the diameter of the pipe is less than 250 millimetres.
(b) 5 metres where the diameter of the pipe is between 250 and 400 millimetres, and
(c) a distance to be agreed on a case-by-case basis and before the submission of the Plan under sub-paragraph (1) is submitted where the diameter of the pipe exceeds 400 millimetres.

Groundwater abstraction points and source protection zones (1 and 2)

AWS have noted a significant number of surface water receptors throughout the preferred options boundaries including Main Rivers, ordinary watercourses and field drainage channels associated with the River Yox, River Blyth, River Fromus, Minsmere River, River Alde, Walpole River, River Dove, and River Waveney. As well as the Internal Drainage Board (IDB) maintained watercourses and ditches of East Suffolk and Waveney, Lower Yare and Lothingland IDB's.

A high-level review of defras mapping identifies the following areas situated within Source Protection Zones 1 and 2 or drinking water protected or safeguarded zones.

- Advanced Water Recycling Plant (AWRP)
  - Safeguarded Drinking Water Zone
- Western Service Reservoir (WSR)

- Drinking Water Safeguarded Zone
- AWRP to River Waveney Pipeline Corridor (3)
  - Drinking Water Protected area
  - SPZ 2
- Barsham Water Treatment Works to CSR Pipeline Corridor (5)
  - Drinking Water Protected Areas
  - SPZ1
  - SPZ2
- CSR to WSR Pipeline Corridor (7)
  - Drinking Water Safeguarded Zone
- CSR to Saxmundham Water Tower Pipeline Corridor (10+10A)
  - SPZ2

AWS would expect groundwater protection measures to be implemented to protect principal aquifers used for drinking water abstraction, particularly within SPZs 1 and 2, using hydrogeological risk assessments to ascertain the risk to controlled waters (groundwater) in these areas. AWS would request to be further consulted, ideally via stakeholder liaison meetings once route options and proposals are fully understood. It is not considered that risk to groundwater should be scoped out at this stage, given the proposed pipeline route option through SPZs 1 and 2.

Any proposed dewatering activities should be addressed through the Environment Agency's National Permitting Service, in terms of granting licenses, while ensuring sufficiency of groundwater resources for abstractors and the environment.

Ground Conditions and Land Contamination

There are Anglian Water groundwater abstraction points and their corresponding source protection zones (both 1 and 2) within close proximity to the preferred options boundary. We would therefore have concerns on any construction works or operation of the scheme that would adversely impact on these zones and water quality and would welcome further discussion on these matters.

AWS therefore would therefore expect impacts and mitigation measures to be identified and implemented within the Construction Environment Management Plan (CEMP) to ensure AWS assets are not adversely affected in terms of quality or structural integrity by the proposed development. This should include measures to mitigate effects from spills from the storage of fuel, chemicals and materials, and mobilisation of existing ground contamination. AWS would seek to ensure that appropriate measures are included to reduce risk of contamination that may impact abstraction for public water supply and minimise risk of damaging our water supply and sewerage assets which may present pollution risks to the local environment. We request further information regarding proposed groundworks, in particular deep excavations near AWS assets, for our review and that a meeting take place to discuss.

Subsequently, AWS may need to be a consultee set out in the Requirements of the DCO for the approval of detailed management plans covering these aspects.

Water Management

Anglian Water seeks clarification on the following matters:
- If water recycling/ sewerage services are required from Anglian Water (all stages).
- If a water supply is required (all stages).
- Whether the management of surface water will require a public sewer connection.

Anglian Water requests that these points are fully assessed and confirmed in the EIA. Further advice is provided below.

Water recycling/ sewerage services

AWS would seek to understand how wastewater from the project including during construction; testing; ongoing operation and de-commissioning are intended to be managed. As part of a drainage strategy, details of how wastewater is intended to be disposed of, such as a connection to an available public sewer, will need to be confirmed at all project stages within the EIA. There are currently no details in respect of a need for a permanent foul drainage solution for any of the proposed sites. As such, AWS also seek to understand the requirement of any site operations, options may include connecting to the nearest available public sewer or a self-contained independent non-mains domestic storage and/or treatment system.

We would suggest that this is confirmed at an early stage, or that a pre-application is made to request a connection through our InFlow | Development Services, so that connections can be appropriately planned for.

Water Resources and Water Supply

The project is located within the Hartismere Water Resource Zone (WRZ). The Anglian Water region is identified as 'seriously water stressed' in the Environment Agency's 2021 classification of water stressed areas. Whilst it is noted wastewater from Lowestoft WRC is to supply the core water for processing, AWS notes there are no details around requirements of water supply for the construction and operation of the project, in particular, in connection with potable water. One specific point for the Environmental Statement (ES) therefore and in view of the potential impacts on water resources, is that the applicant is advised to consider the published Water Resources East Regional Plan Regional Plan which sets out the collective water companies position in the East of England.

The Water Resource Management Plan (WRMP) for AWS is available on our website, and we would advise these documents are referenced in Bibliography/ References EIA as a data source listed.

As water will be used in the project, impacts of climate change in terms of water availability for the construction, operation and decommissioning stages are also of relevance.

There is a need to ensure that any development proposals do not have an adverse effect on any existing boreholes which are used to supply the public with drinking water. The EIA will need to consider water resources and water efficiency through the preparation of a Water Resources Assessment (WRA).

For applications under the 2008 Act, the WRA (or its summary) should form part of the EIA sufficient to enable regulators including the Environment Agency to advise the Examining Authority and the Secretary of State that the supply of water to the project is deliverable and sustainable. A WRA would include setting out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. Anglian Water recommends that the WRA is an integral part of the EIA.

The project should not assume that water will be available for construction and operation. If that water supply is not available from Anglian Water, then alternative supplies through local abstraction may cause environmental harm and so may not be consented by the Environment Agency. The construction of alternative water supplies may themselves generate Green House Gases (GHG).

Anglian Water has a statutory duty to supply water for domestic purposes. This means we are legally obliged to supply water to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets, and showers) of non-household properties. In many cases, domestic demand will be the only requirement for non-household properties (e.g., schools, hospitals, offices, shops, and hairdressers). Non-domestic demand refers to water use for industrial processes, (e.g., agri-food production or car washes), and there is no legal requirement for us to supply for this type of water usage where it might put at risk our ability to supply water for domestic purposes.

Although Anglian Water does not have a statutory obligation to supply for non-domestic purposes in these circumstances, we factor this into our WRMP and we do everything we can to support businesses in the region, with the help of the water retail market.

Anglian Water has adopted a Non-domestic demand June 2026' (copy attached) which states that requests over 20m3/day will be declined. However, for NSIPs that are requesting over 20m3/day of non-domestic water (as defined above) for a scheme, a Water Resources Assessment (WRA) form must be completed Water Resource Assessment (NSIPS and SDOs) - template Feb 2025 FINAL.docx. This is so we can better understand water demands, water efficiency measures and more effectively forecast water supply requirements. This will help enable us to support projects that help achieve national ambitions such as achieving net zero carbon and unlocking sustainable growth.

Our new position on non-household supply is due to our joint aim with the Environment Agency of reducing abstraction to protect sensitive environments. Anglian Water now advise that new non household water supply requests (construction and operational phases) may be declined as these could compromise our regulatory priority of supplying existing and planned domestic growth.

The flows needed to fill water storage tanks for example (if rainwater harvesting on site is not used to meet non-potable demand) will need to be assessed by Anglian Water to advise whether a supply is feasible, when assessed in terms of the potential to jeopardise domestic supply or at a significant financial or environmental cost.

Anglian Water recommends that new water supply connections are not sought during construction and that potable water supply for welfare facilities, for example, are served by tanker to reduce the embedded (capital) carbon from providing new connections. The Applicant should confirm that there will be no temporary concrete batching facilities with consequent water demands and would be offsite and so not require an on-site supply. Water requirements for firefighting measures and construction traffic (dust suppression/ wheel washing areas) should also be explained.

We would advise you to contact planningliaison@anglianwater.co.uk to discuss the need for water and wastewater connections. The team can take you through the Inflow registration InFlow | Development Services, the need to submit a pre-planning enquiry request and the requirement to complete a WRA form which will also need to be included in the EIA. This should set out a daily demand for each stage of the project and whether this is for domestic or non-domestic uses. A copy of our WRA template is attached.

Flooding and Surface Water Drainage

AWS is responsible for management of the risks of flooding from surface water which are directed to foul water or combined water sewer systems and would welcome the completion of a Flood Risk Assessment (FRA) and Water Framework Directive (WFD) Assessment, and a Surface Water Management Plan (SWMP) to inform the impacts in the Hydrology, Hydrogeology and Flood risk associated with the project.

Our advice on surface water management is available here: aws-surface-water-guide-sm.pdf Potential embedded design measures should include Sustainable Drainage Systems (SuDS) to be utilised at permanent above ground installations to manage rainfall run-off and achieve sufficient attenuation to avoid increases in flood risk, and compensation flood storage at temporary site compounds to manage flood risk at these locations.

AWS will not accommodate any surface water run-off into a foul sewer, and only to a combined sewer in exceptional circumstances. Our preference would be for surface water run-off from above ground permanent buildings and impermeable surfacing to be managed by SuDS with any outfall to a watercourse, in accordance with the drainage hierarchy.

The FRA should consider any increased risk of surface water and groundwater flood risks arising from the scheme that could exacerbate sewer flooding risks due to infiltration/ingress to our networks. The likelihood of more extreme weather events leading to higher-than-average rainfall and cumulative impacts of storm events, as recently experienced during Winter 2023/24, mean that infrastructure becomes increasingly vulnerable to flood risk. The project should aim to minimise any flood risks as far as possible by designing in measures to limit increased flood risks to utilities infrastructure.

Flooding from other sources should include reference to AWS infrastructure and further detail provided regarding potential temporary effects on flood risk from third party infrastructure works during construction of the project should be provided in the FRA, given the interfaces between the project and AWS assets. These interfaces will also be managed through the Protective Provisions and agreed construction practices.

Subject to confirmation that all surface water will be managed following the drainage hierarchy, including SuDS, AWS would want to clarify that the DCO as proposed will have no connection to the public sewer network for construction or for operations. This would then negate the need for the draft DCO Order to provide for any connection and so require consequent Protective Provisions and Requirements to ensure any connections did not compromise the wastewater services of existing customers.

We consider that SuDS and the potential for rainwater harvesting to serve any non-potable water requirements, should be used. Notwithstanding the lead roles of the Lead Local Flood Authority, the Environment Agency and the Internal Drainage Boards, AWS would welcome clarification on how consequent impacts on the local drainage/ sewerage network will be designed as part of the scheme. AWS will be a consultee set out in Requirements for the approval of drainage strategies and surface water management plans.

We would encourage any pre-planning enquiries are made through our InFlow platform to ascertain the most appropriate solution is taken forward.

Scope of Environmental Impacts and Effects

Whilst most of the land within the preferred option boundary is agricultural there are interfaces with some of our water and sewer pipes that operate under pressure. The EIA should identify sources of flooding in terms of fluvial flooding events, storm events, and damage to utilities, including from other sources such as sewer flooding.

These interfaces should be managed through the Bespoke Protective Provisions for Anglian Water and agreed construction practices in the CEMP. Horizontal direct drilling (HDD) will need to take account of rising mains (pressurised sewer) to avoid pollution risk to protected habitats.

Approach to Cumulative Effects

AWS would welcome a Cumulative Effects Assessment (CEA) as part of the EIA process to assess the inter relationships and cumulative effects of the project with other developments on the same single receptor or resource. AWS recognises that cumulative schemes are generally based on existing and/or approved development, given that the information is readily available from local authority planning registers or the Planning Inspectorate website. Consideration of our AMP8 projects would be welcomed.

Management Plans

AWS would welcomes the inclusion of an outline Construction Environmental Management Plan (CEMP) in the next stages of the application and should include mitigation measures required to safeguard and remove the risk of damage to AWS's assets, both below ground and above, from plant and machinery interference (compaction and vibration during the construction phase) including haul and access roads. The impact of traffic vibration on underground water/sewer mains must be sufficiently identified. This is mainly a risk where the depth of soil covering our assets has been reduced due to the construction of temporary construction compounds, bellmouths and haul roads used by construction traffic. We would seek appropriate mitigation measures to be addressed in the various construction, traffic, and noise/ vibration management plans to avoid any adverse impacts arising from construction traffic vibration on the operation of our assets.

Further advice on minimising and then relocating (where feasible) AWS existing assets can be obtained from: connections@anglianwater.co.uk

Major accidents and disasters:

AWS identifies that the site is crossed by several utilities, including easement and separation distances required to be maintained. AWS would welcome specific reference on how the interfaces with utility assets such as sewers and water supply within the final proposed Order Limits will be managed through the construction of haul roads, bellmouths etc. Whilst our bespoke Protective Provisions should address those interfaces with our assets, we would welcome further discussion with the applicant regarding such matters and their inclusion in the final versions of the DCO documents.

These documents should include steps to remove the risk of damage to our assets from plant and machinery (compaction and vibration during the construction phase) including any haul and access roads and crossings. AWS would seek to safeguard 24 hours /7-day access to our assets, and this is not compromised. We would, therefore, welcome further discussion with the applicant regarding such matters and their inclusion in the finalised documents. We consider that until the clash assessment has been undertaken by AWS then the likelihood and magnitude of impacts cannot be assessed and so it is not possible to scope out these impacts from the EIA.

Engagement and Next Steps

As a statutory consultee and the water and sewerage undertaker for the area AWS would welcome structured engagement with the Applicant throughout the forthcoming stages of the project to address and resolve issues prior to the submission of the DCO, including Bespoke Protective Provisions, in line with the requirements of the 2008 Planning Act and guidance.

Experience has shown that early engagement and then agreement is required between NSIP applicants and statutory undertakers during design and assessment and well before submission of the draft DCO for examination.

Consultation at the later stages would in our view be too late to inform design and may result in objections and delays to the project, including potential requests to change the project 's Order Limits, to ensure services to existing customers and future growth are not prejudiced. The preparation of a Statement of Common Ground (SoCG) should document key issues and the status of whether issues have been resolved or remain under discussion, which helps to reduce the Examining Authority questions for statutory undertakers and removes the possible need for changes to the project during Examination.

AWS will seek to engage further with the Applicant through the forthcoming phases to discuss, amongst other matters:

- Impact of the development on AWS water supply, treatment, and recycling assets.
- The design of the project to minimise interaction with AWS existing and planned assets/ critical infrastructure and specifically to avoid the need for mitigation works and diversions which have associated carbon costs.
- Requirement for potable and raw water supplies (if any) and the inclusion of the WRA in the EIA.
- Requirement for water recycling connections (if any).
- Confirmation on the appropriate design/ mitigation of proposed works in the vicinity of groundwater abstraction points and corresponding source protection zones (1 and 2).
- Draft Bespoke Protective Provisions and Requirements.
- The preparation of a draft SoCG prior to submission.

Please do not hesitate to contact me on these aspects so they can be progressed during the pre-application to decision stages of the project, or should you require clarification on the above response.

Yours sincerely,

[redacted]

Strategic and Spatial Planning Lead
Growth, Planning and Capacity

Planning – Place Directorate

Rishabh Rai/Claire Deery
Environmental Services
Infrastructure Decisions And Applications Service
Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Please ask for	: [redacted]
Direct line	: [redacted]
Your reference	: WA0210003
Our reference	: DC/26/03846
E-mail	: planningpink@baberghmidsuffolk.gov.uk

8th September 2026

Dear Rishabh Rai/Claire Deery

APPLICATION FOR SCOPING OPINION - DC/26/03846

Proposal: Consultation on EIA Scoping Opinion for the Suffolk Water Recycling Transfer and Storage NSIP

Location: Suffolk Water Recycling Transfer And Storage, , ,

Thank you for your request for a Scoping Opinion under the Town and Country Planning Environmental Impact Assessment Regulations 2017 received on 4th September 2026. I can confirm this has now been registered and we intend to respond to your request by 23rd Septemberber 2026.

In the meantime, should you have any questions or queries please contact the Officer named at the top of this letter.

Yours faithfully

[redacted]
Chief Planning Officer

Rishabh Rai

From: [redacted]@becclestowncouncil.gov.uk>
Sent: 24 September 2026 15:50
To: Suffolk WRTS
Subject: Essex and Suffolk Water Your Ref: WA0210003

You don't often get email from [redacted]

Good afternoon,

Following a meeting of Beccles Town Council's Planning and Highways Committee on Tuesday 22nd September, the proposed application by Essex & Suffolk Water was discussed.

The Committee decided to abstain from commenting, as members felt that their comments would not have any impact on the decision.

Kind regards,

[redacted]
Deputy Town Clerk, Beccles Town Council and Deputy Secretary, Beccles Fenland Charity Trust
Town Hall, The Walk, Beccles NR34 9AJ
[redacted] | [redacted]

Follow Beccles Town Council [redacted]

Beccles Soapbox Derby returns on Sunday 27th September from 11.30am.





More information can be found here: Beccles Soapbox Derby - Visit Beccles

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Benhall and Sternfield Parish Council:

Suffolk Water Recycling Transfer and Storage Project

Environmental Impact Assessment – Scoping Opinion Consultation Response

Introduction:

Benhall and Sternfield Parish Council (the PC) is grateful for the opportunity to respond to this scoping opinion consultation and because it is extremely concerned about the unprecedented number of Nationally Significant Infrastructure Projects (NSIPs) being developed in East Suffolk at the moment, is going to comment on the Suffolk Water Recycling Transfer and Storage (SWRTS) project in the context of East Suffolk's cumulative impacts problem.

Cumulative Impacts:

The following major infrastructure projects are already being developed or are due to be developed in East Suffolk:

- Sizewell C twin reactor nuclear power station
- The Scottish Power Renewable (SPR) EA1N and EA2 substations at the Kiln Lane substation site at Friston
- NGET's connection hub at the Kiln Lane site
- The South Saxmundham Garden Neighbourhood development of 800 houses and an industrial retail unit etc
- The 250MW Helios Solar Park
- The SWRTS project
- Additional Solar Parks – one of which is expected to have a capacity of 600MW

Even though construction at Sizewell C (SZC) is still only in the early stages, it has already been extremely disruptive and the scale of this disruption has taken everyone by surprise. It is inevitable that developing two nuclear reactors on an eroding coastline, at the end of a constrained rural road network, right next to a town with a population less than half of the construction workforce, without an adequate supply of water will generate considerable construction impacts and that additional impacts from other NSIPs being added on top of this will contribute to an increasing cumulative impact burden that the East Suffolk community will have to withstand over the next 10 to 15 years.

During the SPR EA1N and EA2 DCOs – (the first of the current cohort of East Suffolk's major electrical infrastructure projects to be examined) – the Examining Authority (ExA) expressed concerns that the effects of the cumulative delivery of the SPR projects were ***so substantially adverse*** that utmost care would be required were any further projects to be connected at Friston in the future. The ExA also recognised that the NGET connection point – which was consented as part of the SPR projects rather than in its own right – was in fact a strategic ***'de facto' connection hub*** at a place in which ***arguably such a facility should not***

be developed because its harms would outweigh its benefits (words in italicised bold letters taken from the EA1N and EA2 DCO documentation). Despite this caution, one electrical infrastructure project after another has been lined up to connect at the NGET connection hub at the Kiln Lane site and East Suffolk looks set to become an energy super-hub with 30% of the country's electricity supply being generated in or transmitted through it.

Lack of Coordinated Strategic Oversight:

With NSIP after NSIP being proposed for development in East Suffolk and with Developers looking at projects individually rather than cumulatively, it is very concerning that there appears to be a complete lack of strategic oversight of the concurrent development of all these major infrastructure projects in the same small geographical area.

An example of lack of oversight and poor coordination between projects was evident when the SWRTS project was first proposed and a water pipe between Saxmundham and SZC had mistakenly been positioned through the middle of the Saxmundham converter stations site.

Another example was seen when an inadequate water supply for construction and operation of SZC was cited as a reason that the project should not be recommended consent for development, but that when this recommendation was dismissed, a shortage of water supply at SZC ensued which created the need for the SWRTS project to provide 3 million litres of water per day to the SZC site. In other words, although the PC realises that there is a wider needs case for the SWRTS project, it also recognises the irony that the water requirements for construction of so many major infrastructure projects in East Suffolk is partly responsible for the needs case of the SWRTS project in the first place.

The PC would thus like to ensure that cumulative impact issues sit at the forefront of all aspects of the SWRTS project's Environmental Impact Assessment (EIA) and that effective strategic coordination exists between all the Developers of East Suffolk's multiple NSIPs.

Human Health and Wellbeing:

When human health is being considered from an EIA perspective, it seems that plenty of consideration is given to quantifiable factors such as working hours, but that a much more limited view is taken when addressing factors that are more difficult to quantify such as stress. However, since it is clear that stress is seen as the single most important factor that drives people towards the "wrong" end of the Mental Health Continuum, the PC is particularly worried that the effects of stress on the human beings stuck in the middle of so much construction are not being "seen" and that the increasing stress levels and feelings of anxiety and helplessness already being experienced are being overlooked.

If layer upon layer of major infrastructure development is allowed to continue, it could lead to an intolerable state of disproportionate infrastructure duress that goes way beyond mitigation or funding solutions and starts to erode the local community's human right to live

daily life without constant interference from the disruption of years of ongoing construction all around them. All the Developers of East Suffolk's multiple NSIPs, including the SWRTS project, should work together to ensure a coordinated approach to reviewing the local community's lived experience of stress and anxiety and should develop a pre-emptive plan of action ready to deal with any health and wellbeing issues that arise.

Socioeconomics and Adverse Impacts on Tourism:

East Suffolk is unique in terms of what it offers, from its National Landscapes and tranquillity to its thriving arts scene and much, much more. It is dependent on nature-based environmental tourism for its very economy and it is self-evident that the adverse impacts of construction of SZC, EA2 and the NGET connection hub are already having a profound negative effect on this. Construction of the SWRT project will further compound this adverse effect and this will have to be carefully monitored: if impact avoidance or minimisation cannot be achieved, mitigation and compensation will have to be provided.

Traffic, Access and Local Road Maintenance:

Construction related to SZC on East Suffolk's constrained rural road network has already been extremely impactful. Roadworks have become part of life, journey times are often extended and always unpredictable, road closures and diversions are commonplace with chaotic signage doing nothing to reduce disruption. Sideroads and verges have been damaged by inappropriate traffic flows, there are potholes everywhere, junctions that used to be manageable have become very tricky and so on and so forth. There is absolutely no doubt that SWRTS traffic and construction work taking place along the local road network will exacerbate these problems and great care will have to be taken to ensure that trenching for laying water pipes etc is properly coordinated with the roadworks of other projects. The PC would also like to see that roads, verges and landscapes that are disrupted during construction are fully returned to a pre-construction state when work is completed.

Workforce Accommodation:

The construction workforce for SZC will be in excess of 10,000 people and finding accommodation for this huge increase in numbers is extremely difficult. The housing market in East Suffolk has been skewed by this dramatic influx of people and many local tenants in the Leiston area have found themselves being forced out of their accommodation in order that higher paying SZC tenants can move in. The workforce of the SWRTS project will obviously be very small by comparison to that of SZC, but the important thing to recognise is that everything has to be considered in the light of the new baseline that SZC has brought about.

Local Council Workload:

The PC has been profoundly affected by the increase in workload that so many NSIPs being developed locally is creating. For example, the PC has had to increase the parish clerk's

hours from 4 hours to 5 hours per week (with the funding to cover this coming out of the council's budget rather than from the projects that are causing the increase in hours) and councillor workload has exploded with new-found roles including writing endless consultation responses, holding meetings to disseminate information to local residents, making representations at DCOs, attending multiple meetings, staying on top of writing emails to mention but a few. With so much going on, it is not uncommon to encounter diary clashes and competing deadlines and it is sometimes impossible to keep up with it all – which is what happened with the PC's response to the SWRTS project's pre-statutory consultation! This aspect of construction impacts needs to be added to the list of subjects being assessed by the EIA.

Conclusion:

It is imperative that all aspects of the SWRTS project are considered in the context of East Suffolk's increasing infrastructure burden. It is also critically important that Developers adopt a highly coordinated approach to all the projects cumulatively and that coordinated construction timelines are given the highest priority.

Neighbouring Authority Consultation Response

Application No.	PL/2026/1219/NAC
Site at:	Suffolk & Norfolk (Suffolk Water Recycling Transfer and Storage)
Description of proposed works:	Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)
Date:	10-09-2026

Breckland Council has considered the proposal and has **NO COMMENTS** to make at this stage.

Signed: [redacted]
Director of Planning & Building Control
Development Management
Breckland Council

BA/2026/0252/SCOCON

Application PINS ref: WA0210003

Proposal/Description: Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development) Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Detailed comments:

1. Landscape

1.1 As expected, a full Landscape and Visual Assessment has been scoped in to accompany the planning application to address potential significant landscape character and visual impacts on the landscape and to inform the scheme design and preservation and restoration of the landscape. The application is supported by an EIA Scoping Report (August 2026) prepared by Essex and Suffolk Water. Chapter 10 covers Landscape and Visual issues with supporting figures.

1.2 Currently no Zone of Theoretical Visibility (ZTV) has been prepared. Study areas of 3km radius for landscape and a 5km radius for views from the boundary of the EIA Scoping Area proposed, and at this preliminary stage are considered appropriate. The Figures showing the Landscape Character Areas (LCA) is incomplete within the scoping document due to time restrictions. For clarity, all affected and nearby neighbouring LCAs need to be scoped in.

1.3 In terms of Baseline data, this generally appears to be what we would expect to be scoped in. In addition, the following need to be scoped in:

- Design Guide and Code for the Broads Supplementary Planning Document:
- Landscape Character Assessment Supplementary Planning Document (SPD)

1.4 Significant Effects: We would expect to see proposed changes of topography to be included as a potentially significant landscape impact during the Construction Phase and the Operational Phase.

1.5 Night-time/Daytime and Assessment: We advise that we need to see residential receptors within 500m of above ground components where the daytime effects during operations and construction phases are likely to be significant needs to be both be scoped in.

1.6 Considering the intrinsic nocturnal character of the Broads, Adopted Local Plan Policy DM22 (Local-Plan-for-the-Broads.pdf), Local Plan Policy POSP7: Tranquillity in the Broads, we expect night-time assessment of likely significant visual effects within the Broads Authority Executive Area to be scoped into the ES.

1.7 Mitigation: Tertiary (Inexorable) Mitigation (Construction Phase): The inclusion of soils management needs to be in line with Defra soil handling guidance as provided via the Code of Practice for the Sustainable Use of Soils on Construction Sites and the updated Good Practice Guide for Handling Soils in Mineral Workings, which set out practical standards for stripping, storing, and restoring soils sustainably.

1.8 Assessment Methodology: The assessment methodology is broadly consistent with the principles set out in GLVIA3 and accords with established best practice. We welcome confirmation that the assessment of the Proposed Development's effects during the construction phase and in Year 1 following completion will adopt a precautionary worst-case approach, assuming winter conditions when existing vegetation is not in leaf. This approach is consistent with the Planning Inspectorate's NSIPs: Pre-Application Advice on Environmental Impact Assessment (July 2026).

2. Local Planning Policy

2.1 The list of Local Planning Policy documents appears relatively comprehensive; however, the Diss and District Neighbourhood Plan must be scoped in (adopted by South Norfolk Council and Mid-Suffolk District Council on 16 October 2023).

2.2 The proposals need to scope in the following policies from the Local Plan for the Broads 2015 – 2036 [among others]:

- Policy DM8: Green infrastructure
- Policy DM13: Natural Environment
- Policy SP7: Landscape character
- Policy DM16: Development and landscape
- Policy DM22: Light pollution and dark skies
- Policy SP11: Waterside sites
- Policy DM28: Development on waterside sites in employment or commercial use, including boatyards
- Policy SP13: Navigable water space
- Policy DM31: Access to the water
- Policy SP14: Mooring provision

- Policy DM33: Moorings, mooring basins and marinas
- Policy DM43: Design
- Policy DM46: Safety by the water

2.6. Landscape and Visual Impact Assessment (LVIA)

3. Ecology

3.1 The information submitted as the EIA Scoping Information appears comprehensive. However, a list of the protected species that the survey will be focusing on is required. It is assumed that this includes the invertebrates, for example the Fen Raft Spider *Dolomedes plantarius*, the Little Whirlpool Ramshorn Snail *Anisus vorticulus* and Desmoulin's whorl snail *Vertigo moulinsiana*, but we need to have this confirmed.

3.2 As part of the scheme progression, we still need to look at the core data and the solution as the pipeline crosses the marshes and side valleys. Useful discussion has taken place in terms of the HDD (Horizontal Directional Drilling) for the main Broads crossing but have not fully resolved the final crossing before the outflow which will be part of ongoing discussions.

4. Trees

4.1 The Environmental Statement for the proposed water recycling transfer and storage project needs to include sufficient arboricultural information to identify and assess the likely significant effects on trees, tree groups, hedgerows and woodlands, including those within or adjoining the Broads Authority. The information needs to meet the requirements of Regulations 10 and 11 and Schedule 4 of the EIA Regulations, while remaining proportionate to the current stage of the project. It needs to establish a reliable strategic baseline rather than duplicate the detailed tree-by-tree work that will be required once the design is sufficiently developed.

4.2 Arboricultural Baseline: Maps, plans or suitable spatial data needs to identify the presence, location and general distribution of trees, tree groups, hedgerows and woodlands within the project area and, where relevant, immediately adjoining it. The Broads Authority boundary needs to be clearly shown where the scoping area overlaps or approaches it. The baseline needs to indicate the principal species, approximate age or maturity, general condition and arboricultural or ecological value, with particular attention to important individual trees, linear features, field boundaries, roadside vegetation and areas where proposed infrastructure may interact with established vegetation. Targeted arboricultural and hedgerow survey work needs to therefore be undertaken to a level sufficient to characterise the existing resource, identify sensitive locations and inform route selection. A detailed survey of every individual tree is not

necessarily required at the Environmental Statement stage, provided the information is robust enough to identify likely significant effects and areas requiring further assessment.

4.3 Potential Effects: These include:

- Direct removal, severance or fragmentation of trees, hedgerows and woodlands during site clearance or construction.
- Damage to retained roots, stems or crowns from excavation, changes in ground levels, access arrangements, temporary compounds, storage or construction activity.
- Soil compaction, altered drainage, contamination, pollution, increased exposure and other changes to the growing environment.
- Effects where roads, working corridors, HGV routes, rights of way, cycleways, pipelines or other infrastructure cross or run adjacent to field boundaries, roadside verges or other linear vegetation.
- Loss of landscape, ecological, screening or connectivity functions associated with important trees and hedgerows.

4.4 The assessment needs to identify the likely scale, duration, reversibility and significance of these effects at an appropriate level. It needs to distinguish locations where impacts are unlikely to be material from those where route refinement, specialist construction methods or more detailed arboricultural assessment will be required.

4.5 Legal Protections and Constraints: The Environmental Statement needs to identify known statutory and planning protections affecting trees and woodland, including Tree Preservation Orders, conservation areas and other relevant designations or constraints. Ancient woodlands, veteran trees, important hedgerows and other features of particular arboricultural, ecological or landscape value needs to be clearly identified. The assessment needs to explain how these constraints have influenced route selection, design, construction methods and mitigation.

4.6 Detailed Design and Implementation: Once the detailed design is brought forward, fully detailed Arboricultural Impact Assessments needs to be commissioned in accordance with BS 5837:2012. These assessments need to examine the relationship between proposed works and retained trees, including root protection areas, access, excavation, service installation, drainage, changes in levels, construction methodology and tree protection measures. Project-specific arboricultural method statements need to be prepared where works are proposed within or close to sensitive rooting environments. This detailed stage needs to build on, rather than duplicate, the strategic information supplied with the Environmental Statement.

4.7 Omissions to address:

1. Clearly map the Broads Authority boundary together with trees, tree groups, hedgerows and woodland that could be affected.

2. Prepare a proportionate strategic arboricultural baseline covering distribution, principal species, maturity, condition, value and known protections.

3. Assess both direct and indirect effects and state their likely significance.

4. Demonstrate application of the mitigation hierarchy, supported by practical route, construction, protection, compensation and monitoring measures.

5. Undertake targeted hedgerow and arboricultural surveys where current information is insufficient.

6. Commission detailed Arboricultural Impact Assessments and method statements at the detailed design stage in accordance with BS 5837:2012.

7. Consult the Broads Authority and other relevant stakeholders as the assessment and design develop.

4.8 A comprehensive Environmental Statement cannot properly address trees and arboricultural matters without a sufficiently reliable baseline and a clear assessment of the likely significant effects. At this stage, that information may remain strategic and proportionate, but it needs to be specific enough to identify sensitive features, demonstrate that avoidance has been prioritised and show that remaining effects can be appropriately mitigated or compensated. Detailed assessment during design development will then be required to translate those commitments into workable route alignments, construction controls and long-term planting and monitoring proposals.

4.9 Section 10.6.1 of the Scoping Document with regard to ancient and veteran trees which states as follows:

"Landscape features such as ancient woodland, veteran trees and trees subject to tree preservation orders ('TPOs') located at distances of greater than 15m from the Order limits are proposed to be scoped out of the assessment in the ES, as it is unlikely that the root protection zones of these will be directly impacted by the Proposed Development's construction, operational or decommissioning activities."

Government advice on making planning decisions for ancient woodland, ancient trees and veteran trees states that for ancient woodland, a buffer zone of at least 15 metres needs to exist from the boundary of the woodland (it does not define boundary so I have always taken this as the edge of the canopy), whilst for ancient or veteran trees the buffer zone needs to be at least 15 times larger than the diameter of the tree. The point being with both these sets of advice is that these are just the minimum requirements. If an assessment shows that impacts from the development

are likely to extend beyond these standard distances, a larger buffer zone will be required. Moreover, with ancient and veteran trees, the buffer is not capped so a tree with a trunk diameter of 2 metres would require a 30 metre buffer zone. This size of tree is not at all unlikely for a veteran – a statistical analysis of Hayden's (the arboricultural consultants for the Broads Authority) tree inspections going back over 15 years shows (i) the largest veteran oak trees up to 2.39 metres in diameter – thus requiring a buffer zone of almost 36 metres – and (ii) an average stem diameter of 1.36 metres – requiring buffer zones in excess of 20 metres.

For this reason, it is advised that the proposed scoping out of ancient woodland and veteran trees at 15 metres provides inadequate protection, and instead the scoping out boundary needs to be increased to at least 30 metres.

5. Historic Environment

5.1 Section 11.3.1: The Broads Authority also have responsibilities relating to the historic environment as the Local Planning Authority for the Broads Authority Executive Area. The Broads Authority needs to be added to this list and will be engaged throughout the process as a stakeholder in the Historic Environment.

5.2 Please refer to Norfolk County Council's advice relating to the historic environment, including archaeology.

6. General and Detailed Observations

a) 'Broads National Park' –the term 'National Park' is used for marketing. In planning terms, the Broads is not a National Park. We are a member of the National Parks family or have status equivalent to a National Park. Using the 'The Broads' and when referring to our area 'Broads Authority Executive area' would be acceptable.
b) Figure 9 and Figures 11 Superficial Geology – the colours used are not easily distinguishable.
c) Figure 20-2 Agricultural Land Classification (ALC) August 2026 Sheet 4 of 14 and so on – I see there is a lot of predicted grade 3a. I cannot see in the document what data source of methodology they used for predicted ACL. Will they confirm the ACL through tests?
d) Figure 15-1 Air Quality Baseline Environment August 2026 Sheet 3 of 14 and 4 of 14 says the grey is LPA area – that is not the case as it does not segregate out the BA area. It might be Local Authority area – that might be what they mean.
e) Appendix 6.1 could reference the BA Peat Guide.
f) Appendix 8.1, 12.1 – are the East inshore and offshore Marine Plans of relevance?
g) Some maps (Figure 10-1 Landscape Character Areas August 2026 Sheet 9 of 14 and so on) show South Norfolk and Broadland Landscape Character Area but they do not show the Broads Landscape Character Assessment Area. Sheets 1, 2, 3, 4, 5 need to show this.

h) Noise and vibration: Species need to also be identified as receptors.
i) The transport section of the final ES (environmental Statement) needs to reflect the landscape impacts of the potential access trackways across the Broads that may be needed. Due regard needs to be had to the Broads Protected Landscape Status.
j) The climate change section of the Final ES needs to refer to adaptation to the effects of climate change? Resilience and mitigation, are referenced in the scoping but not but not adaptation and this needs to be scoped in.
k) Peat: Due regard needs to be had in the final ES to the importance of peat in respect of climate change and heritage – specifically the potential of the Broads for exceptional waterlogged archaeology as referenced by Historic England.
l) Navigational effects 17.1.5 and navigation impact assessment. The ES will require further detail on both. Any potential navigation impacts or impediments will need to be scoped into the Final ES. Where will navigation impacts potentially occur? The pipes are to go under the river.
m) Page 772 – reference to the Broads and tourism is required.
n) Chapter 17 – communication to businesses and people in the area will be key
o) Chapter 18 – should there be reference to the safety of the workers constructing the site included in this section?
p) Chapter 20 – peat soils – HDD will result in the removal of the soil that is displaced by the drilling and the pipes. The ES mitigation section will need to reinforce the need to maintaining the peat as wet and what will happen to peat spoil. It is unclear if excavated peat will be considered a waste. The Broads Authority's Peat Guide: Peat development guide (PDF) needs to be scoped into the ES.

Rishabh Rai

From: Town Clerk <clerk@bungaytowncouncil.gov.uk>
Sent: 18 September 2026 12:19
To: Suffolk WRTS
Subject: Suffolk WRTS project

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

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Good morning

I am writing to confirm that Bungay Town Council do not have any comments regarding the scoping at this point

Best wishes

[redacted]
Town Clerk,
Bungay Town Council

1a, Broad Street, Bungay NR35 1EE
01986[redacted]
[redacted]
clerk@bungaytowncouncil.gov.uk

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Date: 29 September 2026

Cadent Gas Limited
Pilot Way
Ansty
Coventry
CV7 9JU
cadentgas.com

Submitted via email to; suffolkwrts@planninginspectorate.gov.uk

Cadent
Your Gas Network

REF: WA0210003 Suffolk Water Recycling Storage and Transfer Project

PLANNING ACT 2008 CONSULTATION – EIA Scoping and Reg 10

I refer to your letter dated 9th September regarding the above proposed DCO. Cadent has reviewed the project plans provided and wishes to make the following comments:

Retained Assets:

In respect of existing Cadent infrastructure, Cadent will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus,

Cadent Infrastructure within or in close proximity to the development

Cadent has identified the following apparatus within the vicinity of the proposed works:

- High and Intermediate pressure (above 2 bar) gas pipelines and associated equipment.
- Low and Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated)

Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.

Diversions:

Where diversions of apparatus are required to facilitate the scheme, Cadent will require adequate notice and discussions should be started at the earliest opportunity. Please be aware that diversions for high pressure apparatus can take more than two years to plan and procure materials.

Cadent will require the party requesting the diversion works to obtain any necessary land rights, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any application is made. Cadent requires a minimum of C4/ Design study to have been carried out to establish an appropriate diversion route, temporary and permanent land take ahead of any application being made.

Where diversions sit outside the highway boundary the party requesting the diversion will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, in order to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses, and indemnity.

Protection/Protective Provisions:

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and

rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted without approval and will necessitate a Deed of Consent or Crossing Agreement being put in place. Any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions/Asset Protection Agreement and early discussions are advised.

Key Considerations:

- Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings/structures, change to existing ground levels or storage of materials etc within the easement strip.

- Please be aware that written permission is required before any works commence within the Cadent easement strip and a Crossing Agreement may be required if any apparatus needs to cross the Cadent easement strip

- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.

- Cadent will also need to ensure that our pipelines remain accessible throughout and after completion of the works.

- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of Cadent High-Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:

    - Demolition
    - Blasting
    - Piling and boring
    - Deep mining
    - Surface mineral extraction
    - Landfilling
    - Trenchless Techniques (e.g. HDD (Horizontal Directional Drilling), pipe splitting, tunnelling etc.)
    - Wind turbine installation
    - Solar farm installation
    - Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required

Yours Faithfully

[redacted]

Planning and Consents Manager

[redacted]

[redacted]

Guidance

To download a copy of the HSE Guidance HS(G)47, please use the following link:

http://www.hse.gov.uk/pubns/books/hsg47.htm

Essential Guidance document:

Digging Safely - Cadent Gas Ltd

SSW22 – Specification for Safe Working in the Vicinity of Cadent Assets:

SSW22_vMar23_Specification-for-Safe-Working-in-the-Vicinity-of-Cadent-Assets.pdf

Line Search Before You Dig (LSBUD) - LSBUD - Home

Rishabh Rai

From: NSIPs <nsips@cambridgeshire.gov.uk>
Sent: 14 September 2026 15:42
To: Suffolk WRTS
Cc: NSIPs
Subject: FW: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification
Attachments: WA0210003 Letter to stat cons_Scoping & Reg 11 Notification.pdf

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Good afternoon

Thank you for your email in relation to Suffolk Water Recycling Transfer and Storage.

As Cambridgeshire County Council is a neighbouring authority, we would appreciate being kept informed of the scheme's progress.

Please could you remove planningdc@cambridgeshire.gov.uk from the distribution list and add nsips@cambridgeshire.gov.uk.

At present, we do not wish to provide any comments.

Kind regards

[redacted]
Consents Coordinator
Place and Sustainability
Pronouns: she/her why have I put this here?
Cambridgeshire County Council | Facebook | X

Phone: 07442 [redacted]
PO Box 761, ALC2660, Huntingdon, Cambs PE29 9QR

Cambridgeshire County Council

From: Planning DC <PlanningDC@cambridgeshire.gov.uk>
Sent: 09 September 2026 11:13
To: NSIPs <nsips@cambridgeshire.gov.uk>
Cc: [redacted]@cambridgeshire.gov.uk>; Planning DC <PlanningDC@cambridgeshire.gov.uk>
Subject: FW: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

FYI

Thanks and kind regards.

Planning DC

01223 715518

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 09 September 2026 11:07
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Suffolk Water Recycling Storage and Transfer Project – Amendment to deadline for receipt of scoping request responses

With respect to the above consultation and our letter of the 2 September 2026, please note that the 28-day deadline was incorrectly stated on the correspondence.

The correct 28-day deadline for receipt of responses is the **2 October 2026.**

Regards

Planning Inspectorate

Claire Deery (She/Her)
Senior Environmental Advisor
Planning Inspectorate
www.gov.uk/pins

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From: Suffolk WRTS
Sent: 03 September 2026 20:07
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

FAO Head of Planning

Dear Sir/Madam

Please see attached correspondence on the proposed **Suffolk Water Recycling Transfer and Storage**.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the

Environmental Statement that will accompany its future application.

The Planning Inspectorate has identified you as a consultation body to inform the Scoping Opinion and is therefore inviting you to submit comments by **30 September 2026**. The deadline is a statutory requirement that cannot be extended.

Further information is included within the attached letter.

Kind regards

Planning Inspectorate

Rishabh Rai (He/Him)
Associate EIA Advisor
Planning Inspectorate

@PINSgov Planning Inspectorate planninginspectorate.gov.uk

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Rishabh Rai

From: clerk@carltoncolvilletowncouncil.gov.uk
Sent: 15 September 2026 10:29
To: Suffolk WRTS
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Response from Carlton Colville Town Council

Carlton Colville Town Council considers that the Environmental Statement must properly assess the potential effects of the project on Carlton Colville and the surrounding south Lowestoft communities, particularly given the proposed A-W4 pipeline corridor running south from the Lowestoft Water Recycling Centre towards the A146.

The Environmental Statement to specifically consider:

1. Traffic and construction disruption

This is particularly important given the existing pressure on roads around Carlton Colville and Lowestoft. The assessment should include construction traffic, HGV movements, road closures, temporary traffic management and cumulative effects with other major developments.

Suffolk County Council itself has already expressed concern about routing through the middle of Lowestoft, describing it as highly undesirable because of traffic flows, amenity and conflicts with existing utilities.

2. Carlton Colville's planned and existing development

The assessment should take account of planned growth around Carlton Colville, including the existing Local Plan allocations and associated infrastructure. This is important because infrastructure corridors should not be considered in isolation from housing, roads, community facilities and other planned development.

3. Public rights of way and recreation

The ES should identify and assess all footpaths, bridleways and recreational routes affected by construction, including temporary closures and diversion arrangements.

SCC's response specifically says that affected PRoWs need proper surveys and a management plan, including consideration of different users such as cyclists and horse riders.

4. Ecology and biodiversity

The assessment should include impacts on hedgerows, trees, habitats, wildlife corridors, watercourses and protected species, including cumulative impacts with other infrastructure projects.

5. Flooding and drainage

Given the existing flood-management considerations around Carlton Colville and south Lowestoft, the ES should assess temporary and permanent effects on drainage, surface water and flood risk arising from pipeline construction.

6. Archaeology and heritage

This is particularly relevant locally. Carlton Colville has a significant archaeological record, and SCC is requiring geophysical surveys and targeted evaluation trenching for pipeline alignments and reservoir sites.

7. Cumulative impacts

Carlton Colville and south Lowestoft are already dealing with substantial development and infrastructure proposals. The ES should assess this project in combination with other major developments and infrastructure projects, rather than assessing the water scheme in isolation.

SCC's own policy position is that the harms of infrastructure projects should be assessed both individually and cumulatively/in combination with other projects.

8. Clear plans showing the relationship with Carlton Colville

Essex & Suffolk Water need to provide a sufficiently detailed plan showing the proposed pipeline corridor in relation to:

- Carlton Colville parish boundary
- existing residential areas
- Hall Road
- The Street
- Lowestoft Road
- Beccles Road/A146
- Carlton Colville Community Centre
- existing and allocated housing sites
- public rights of way
- important ecological and heritage assets.

Regards

[redacted]
Clerk/RFO to Carlton Colville Town Council
[redacted]

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 09 September 2026 11:07
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Rishabh Rai

From: Corton Parish Council <clerk@cortonparishcouncil.gov.uk>
Sent: 29 September 2026 11:59
To: Suffolk WRTS
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification
Attachments: clerk.vcf

Follow Up Flag: Follow up
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Categories: EST

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Good morning

There were no objections to adopting the Scoping opinions for the above mentioned consultation.

--

Kind regards

[redacted]

[redacted]
Corton Parish Clerk

[redacted]
Tel No: [redacted]

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Rishabh Rai

From: clerk@dennington-pc.gov.uk
Sent: 15 September 2026 07:20
To: Suffolk WRTS
Subject: Re: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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We have received no comments or objections on this project. We have no comments re the scoping document.

Best wishes,

Dennington Parish Council

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: Wednesday, September 9, 2026 11:07 AM
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Suffolk Water Recycling Storage and Transfer Project – Amendment to deadline for receipt of scoping request responses

With respect to the above consultation and our letter of the 2 September 2026, please note that the 28-day deadline was incorrectly stated on the correspondence.

The correct 28-day deadline for receipt of responses is the **2 October 2026.**

Regards

Planning Inspectorate

Claire Deery (She/Her)
Senior Environmental Advisor
Planning Inspectorate
www.gov.uk/pins

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From: Suffolk WRTS
Sent: 03 September 2026 20:19
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/Madam

East of England Ambulance Service NHS Trust

Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

East of England Ambulance Service NHS Trust
Whiting Way
Melbourn
Cambridgeshire
SG8 6NA

By email to: suffolkwrts@planninginspectorate.gov.uk
Your reference: WA0210003

24 September 2026

Re: Suffolk Water Recycling, Transfer and Storage Project. Environmental Statement Scoping Consultation

Dear Ms Deery,

Thank you for consulting the East of England Ambulance Service NHS Trust (EEAST) on the proposed scope of the Environmental Statement for the Suffolk Water Recycling, Transfer and Storage Project.

EEAST considers that the Environmental Statement should address the following matters.

Traffic, Transport and Emergency Access
The assessment should consider how construction traffic, road closures, diversions, pipeline works, abnormal loads and temporary traffic management could affect ambulance response times, patient conveyance routes and access to healthcare facilities.

Emergency vehicle access should be maintained to permanent sites and temporary construction areas, including remote pipeline sections. EEAST should receive advance notice of planned disruptions affecting key routes.

Construction Phasing and Cumulative Effects
The Environmental Statement should explain the anticipated phasing of construction and whether works may take place concurrently across different sites and pipeline sections.

It should assess the combined effects of this project and other major infrastructure schemes in Suffolk, particularly where overlapping construction activity could affect

road capacity, emergency response routes, healthcare access and multi-agency resilience.

Major Incidents and Emergency Preparedness
The Environmental Statement should assess relevant construction and operational risks associated with the water recycling plant, pumping infrastructure, reservoirs and pipelines. This should include fire, flooding, loss of containment, confined-space incidents and incidents at remote or difficult-to-access locations. Where relevant, EEAST would welcome early multi-agency engagement consistent with JESIP principles

Mitigation and Monitoring
Where potential impacts on ambulance operations are identified, the Environmental Statement should set out appropriate mitigation. This should include advance notification, direct liaison with EEAST, maintenance of emergency access and arrangements for managing unplanned disruption.

Relevant commitments should be secured through appropriate management plans or Development Consent Order requirements.

Continued Engagement
EEAST would welcome continued engagement and the opportunity to review relevant documents, including the Traffic and Transport Assessment, Construction Traffic Management Plan, Major Incident and Disasters Assessment and emergency preparedness arrangements.

These comments relate specifically to the scope of the Environmental Statement and should not be interpreted as either support for or objection to the proposed development.

Yours sincerely,

[redacted]

[redacted]
System Partnerships and Integration Lead

FAO: Claire Deery
Environmental Services
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN
suffolkWRTS@planninginspectorate.gov.uk

East Suffolk Council
East Suffolk House
Station Road
Melton
Woodbridge
IP12 1RT

By email to:
suffolkwrts@planninginspectorate.gov.uk

Dear Ms Deery,

Consultation response on EIA Scoping Report relating to the proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development) (PINS reference: WA0210003)

Introduction

This response is submitted on behalf of East Suffolk Council (the Council) in response to the EIA Scoping consultation issued by the Planning Inspectorate (PINS) for the Suffolk Water Recycling Transfer and Storage (SWRTS) Development Consent Order (DCO). As the consultation was issued later than originally anticipated, PINS has confirmed that the deadline for responses is 2 October 2026.

EIA Scoping Report

The applicant commissioned an Environmental Impact Assessment (EIA) Scoping Report, dated August 2026, in accordance with Regulations 10 and 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.

Having reviewed the Scoping Report, this letter comprises the Council's response under Section 43(1) of the Planning Act 2008, with detailed comments provided in Table 1 of Appendix A of this letter.

The Council broadly supports the proposed scope of the Environmental Statement and welcomes the applicant's decision to scope in a comprehensive range of environmental topics. The Council considers the proposed assessment framework to provide an appropriate basis for the continued development of the EIA, subject to the detailed comments and recommendations set out in Appendix A.

Notably, the SWRTS project is one of a number of major infrastructure projects currently proposed, or recently consented but not yet completed, within East Suffolk. The Council therefore considers it essential that the cumulative effects of the SWRTS project, both individually and in combination with other existing and forthcoming projects, are robustly assessed throughout the EIA process and that appropriate measures are identified to avoid, minimise, and mitigate any significant adverse effects.

The response has been prepared on the basis of the information currently available and without prejudice to the Council's future consideration of the proposed development. The Council reserves the right to provide further comments on the scope and adequacy of the EIA as the project evolves and additional information becomes available. This includes circumstances where information submitted at later stages identifies environmental effects, cumulative effects, or assessment requirements that are not currently evident from the Scoping Report, or where the assumptions underpinning the Scoping Report materially change.

Yours faithfully,



[redacted] MRTPI | Head of Energy Planning and Coastal Management
East Suffolk Council

Appendices
Appendix A: Detailed Comments in Response in Response to the EIA Scoping Report for the Suffolk Water Recycling, Transfer and Storage Project

Appendix A: Detailed Comments in Response in Response to the EIA Scoping Report for the Suffolk Water Recycling, Transfer and Storage Project

Table 1 – East Suffolk Council's Detailed Comments on the EIA Scoping Report

ID	Section of report	Description	Comments	'Scoped out' assessment items to be Scoped In
Introduction				
EIA Scoping Report Volume I: Main Report				
IN.1	1.1 to 1.13	Introduction	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
IN.2	Chapter 1: Introduction	Figures 1-1 to 1-3	Noted – no comment.	N/A
The Proposed Development				
EIA Scoping Report Volume I: Main Report				
PD.1	2.3.8 to 2.3.10	Principal Components of the Proposed Development	The Long Sea Outfall (LSO) is the least developed aspect of the project, with three options still under review, making it difficult to fully assess the potential impacts and effects. It has previously been explained by the applicant that the total volume of water received by the AWRP would otherwise be discharged to the North Sea via the existing Anglian Water LSO at Ness Point. On that basis, the proposed development would not necessarily result in a net increase in discharges to the North Sea and could potentially lead to an overall net reduction when compared with the existing baseline. However, this outcome appears to depend on whether the diversion of flows to the AWRP would create additional capacity within Anglian Water's permitted discharge regime. If the diverted flows effectively create headroom that could subsequently be utilised by Anglian Water, the project may not result in a corresponding reduction in LSO discharges and there could	N/A

			remain the potential for a net increase in discharge volumes, together with cumulative and downstream environmental effects.	
PD.2	2.3.5 to 2.3.7; 2.3.11 to 2.3.14	Principal Components of the Proposed Development	The role of the Barsham Water Treatment Works (WTW) in the project is ambiguous. It is acknowledged that the Barsham WTW upgrades are approaching completion, but it is unclear whether there would be an increase in its operational requirements as a result of the Suffolk Water Recycling Transfer and Storage project. The Scoping Report notes that the proposed abstraction from the River Waveney would fall within existing licenses and permits, but this does not necessarily mean that there will be no additional implications for its operation, including energy consumption, among other matters, which may have implications for assessments in the ES. It is also noted that the Barsham WTW would provide additional water volumes, beyond those extracted from the Waveney, to be transferred across the district and wider region. It is difficult to view the Barsham WTW and the proposed project in isolation, there appears to be a degree of functional interdependence.	N/A
EIA Methodology				
EIA Scoping Report Volume I: Main Report				
EM.1	3.3.20	EIA Methodology	Whilst it is broadly agreed that many of the listed pre-construction activities associated with the development can be scoped out, it should be recognised that certain activities, including the establishment of contractor compounds, diversion of apparatus, contamination remediation works, and the installation of pre-site drainage infrastructure, have the potential to result in environmental effects depending on their scale, location, and method of implementation. A precautionary approach should be taken, with these activities Scoped In, unless the applicant can clearly justify and evidence that these activities will not give rise to significant effects, either individually or collectively.	In the absence of further information in relation to the nature of the activities, the following pre-construction activities should be Scoped In: • Above ground site preparation for temporary facilities for the use of

				contractors. • Diversion and laying of apparatus. • Remedial work in respect of any contamination or other adverse ground conditions. • Installation of pre-site drainage, including pipework and outfalls.
EM.2	3.3.28	EIA Methodology	Whilst it is agreed that minor and negligible effects are unlikely to be significant in isolation, it should be acknowledged that minor and negligible effects can still result in significant effects when combined with inter-project and intra-project effects.	N/A
Topics to be Scoped Out				
EIA Scoping Report Volume I: Main Report				
EM.3	4.1 to 4.2	Topics to be Scoped Out	It is agreed that Heat and Radiation should be Scoped Out.	N/A
Topics to be Scoped In				
EIA Scoping Report Volume I: Main Report				
SI.1	5	Topics to be Scoped In	The Council welcomes the thorough approach taken with a broad range of 17 topics Scoped In for further consideration in the Environmental Statement (ES).	N/A
SI.2	5.1.3	Topics to be Scoped In	Whilst lighting is considered under various topics, it is not Scoped In as a standalone effect. This is not objectionable; however, construction task lighting and operation lighting have the potential to cause nuisance, albeit these issues are often relatively easy to avoid or resolve. The applicant should ensure that they produce a Lighting Management Plan (LMP) to cover both construction and operational lighting. This LMP should consider and address potential nuisance and include a complaint	N/A

			procedure to ensure that substantiated complaints of nuisance lighting are resolved.	
Environmental Assessment Topic: Terrestrial Biodiversity				
EIA Scoping Report Volume I: Main Report				
TB.1	6.1 to 6.9	Terrestrial Biodiversity Chapter	The principle of the scope of the proposed terrestrial biodiversity assessment is agreed, subject to the detailed points below being addressed.	N/A
TB.2	Table 6-3	Summary of International Sites within 10km of each EIA Scoping Area Section	Proposed LSO - The Benacre to Easton Bavents Special Protection Area (SPA) is missing from the list of designated sites scope in for assessment. This site should be included.	N/A
TB.3	Table 6-4	Summary of Nationally and Locally Designated Sites within 2km of each EIA Scoping Area Section	Local Natural Reserve (LNR) sites are missing from the sites list in this table, despite Table 6-1 recognising that they need to be considered in the assessment.	N/A
TB.4	Table 6-5	Summary of Priority and Irreplaceable Habitats within 500m of each EIA Scoping Area Section	It should be ensured that for Suffolk the Ancient Woodland Inventory, Second Edition (October 2025) mapping is being used to screen for probable ancient woodland in the assessment area.	N/A
EIA Scoping Report Volume II: Appendices				
TB.5	Appendix 6.1	Terrestrial Biodiversity Legislation, Policy and Guidance	Noted – no comment.	N/A
TB.6	Appendix 6.2	Biodiversity Data Collection Strategy	Consideration should be given to extending surveys for breeding birds into 2027, so that two years of data is available to inform the assessment. This is particularly important for species associated with the designated sites, including Woodlark and Nightjar. It should also be confirmed whether Advanced Bat Survey Techniques are going to be implemented as part of the survey techniques for the project.	N/A
TB.7	Appendix 6.3	Wintering Bird Survey Scope 2025/2026 Report	It is understood that the scope of the wintering bird surveys has already been agreed between the applicant and Natural England, so no further comment.	N/A

EIA Scoping Report Volume III: Figures				
TB.8	Chapter 6: Terrestrial Biodiversity	Figures 6-1 to 6-3	Noted – no comment.	N/A
Environmental Assessment Topic: Freshwater Biodiversity				
EIA Scoping Report Volume I: Main Report				
FB.1	7.1 to 7.9	Freshwater Biodiversity Chapter	No comment. Matters in relation to the Water Framework Directive (WFD) considerations are deferred to the Environment Agency.	N/A
EIA Scoping Report Volume II: Appendices				
FB.2	Appendix 7.1	Freshwater Biodiversity Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
FB.3	Chapter 7: Freshwater Biodiversity	Figures 7-1 to 7-3	Noted – no comment.	N/A
Environmental Assessment Topic: Marine Biodiversity				
EIA Scoping Report Volume I: Main Report				
MB.1	8.1 to 8.9	Marine Biodiversity Chapter	No comment. Matters in relation to marine biodiversity are deferred to Natural England and the Marine Management Organisation (MMO).	N/A
EIA Scoping Report Volume II: Appendices				
MB.2	Appendix 8.1	Marine Biodiversity Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
MB.3	Chapter 8: Freshwater Biodiversity	Figures 8-1 to 8-3	Noted – no comment.	N/A
Environmental Assessment Topic: Water Environment				
EIA Scoping Report Volume I: Main Report				
WE.1	9.1 to 9.10	Water Environment Chapter	Matters in relation to the water environment considerations are primarily deferred to the Environment Agency, Natural England, Internal Drainage	N/A

			Boards, and the Lead Local Flood Authority.	
WE.2	9.4.3	Baseline Data Sources	Acknowledged that several information sources, including information on Private Water Supplies (PWS), have not been obtained for the preparation of the Scoping Report. The applicant should ensure that they consider the risk to PWS in the vicinity of their construction or operational activities, so as to prevent or mitigate impacts to those supplies arising from such activities.	N/A
EIA Scoping Report Volume II: Appendices				
WE.3	Appendix 9.1	Water Environment Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
WE.4	Chapter 9: Water Environment	Figures 9-9 to 9-11	Noted – no comment.	N/A
Environmental Assessment Topic: Landscape and Visual				
EIA Scoping Report Volume I: Main Report				
LV.1	10.2.1 to 10.2.7	Study Area	In the absence of a Zone of Theoretical Visibility (ZTV) having been prepared at this stage, the study areas identified should be viewed as entirely preliminary and subject to refinement as the assessment progresses. A similar approach to that adopted for Terrestrial Heritage is considered appropriate. In that regard, whilst the Scoping Report outlines an initial study area for terrestrial heritage assets, it expressly acknowledges at paragraph 11.2.4: "*Therefore, when a zone of theoretical visibility ('ZTV') and noise model/s are proposed, they will be reviewed and any heritage assets (comprising archaeological remains, built heritage and historic landscape) within these considered likely to receive a significant effect resulting from the Proposed Development will be assessed within the ES*."	N/A
LV.2	Table 10-1	Sources of Baseline Data	Table 10-1 refers to the Suffolk Coastal Landscape Character Assessment,	N/A

			which was renamed as the East Suffolk Landscape Character Assessment in 2025. The table should also include Locally Listed Parks and Gardens within the administrative area of East Suffolk Council.	
LV.3	Table 10-2	Landscape and Visual Receptors for each EIA Scoping Area Section	Table 10-2 must identify District Level Landscape Character Assessments as key receptors.	N/A
LV.4	10.6.3	Impacts Scoped Out of the Assessment	Referring back to the Council's earlier comment, see LV.1, the conclusion reached at paragraph 10.6.3 that visual receptors at distances of greater than 2km from the development's above ground components should be Scoped Out for the operational phase, together with the main/satellite compounds during the construction and decommissioning phases, is not adequately justified and evidenced in the absence of a ZTV. The AWRP and construction compounds could introduce relatively substantial built forms and sources of visual activity within the receiving landscape, and it cannot therefore be concluded at this stage that visual effects beyond 2km would be insignificant or incapable of giving rise to significant effects.	Visual receptors at distances of greater than 2km from the development's above ground components, in addition to the main/satellite compounds during the construction and decommissioning phases, should be Scoped In.
LV.5	10.6.1.	Impacts Scoped Out of the Assessment	Paragraph 10.6.1. must be considered as provisional subject to the contents of the new updated version of *BS:5837 Trees in Relation to Design, Demolition and Construction*. In the draft version of the new British Standard, uncapped root protection areas were proposed for Ancient, Veteran and Category A trees. Impacts beyond 15 metres from the Order Limits may need to be Scoped In.	Depending on the final contents of *BS:5837 Trees in relation to Design, Demolition and Construction*, impacts on Ancient, Veteran and Category A trees beyond 15 metres from the Order Limits should be Scoped In.
LV.6	10.7.2	Proposed Approach to Mitigation	Bunds are referred to as a source of mitigation, on the basis that they provide screening. It should be acknowledged that bunds are capable of	N/A

			generating visual effects in their own right, depending on their location and scale, and are not a neutral feature in the landscape. The same applies to the use of hoarding, which can be incompatible with a rural landscape.	
EIA Scoping Report Volume II: Appendices				
LV.7	Appendix 10.1	Landscape and Visual Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
LV.8	Chapter 10: Landscape and Visual	Figures 10-1 to 10-3	Noted – no comment.	N/A
Environmental Assessment Topic: Terrestrial Historic Environment				
EIA Scoping Report Volume I: Main Report				
THE.1	11.1.6	Introduction	The authorship of the terrestrial historic environment chapter should include reference to the relevant experience, qualifications, and professional membership in relation to built heritage, not just archaeology.	N/A
THE.2	11.4.3 to 11.4.4	Baseline Environment	With regards to built heritage non-designated heritage assets (NDHAs), the Council does not have a local list. Instead, the Council has published criteria for the identification of NDHAs (Non-designated heritage assets | East Suffolk Council), with NDHAs identified through the planning process or Neighbourhood Plans. Conservation Area Appraisals also identify buildings that make a positive contribution to the character of their respective Conservation Areas. The relevant Neighbourhood Plans and Conservation Area Appraisals should be added to the source list for the Historic Environment Desk-Based Assessment (HEBDA).	N/A
THE.3	11.4.31 to 11.4.32; 11.4.68;	Baseline Environment	It is acknowledged that, as set out under paragraphs 11.2.1 to 11.27, the Study Area is not fixed, and is dependent on the preparation of the ZTV mapping. In respect of Heveningham Hall (NHLE 1183040), a full setting	N/A

	11.4.81; 11.4.94; 11.4.97		assessment will be required regardless of its location just outside of the current Study Area, as it has an extensive parkland setting that is sensitive to change.	
EIA Scoping Report Volume II: Appendices				
THE.4	Appendix 11.1	Terrestrial Historic Environment Legislation, Policy and Guidance	Noted – no comment.	N/A
THE.5	Appendix 11.2	Designated Heritage Assets	Noted – no comment.	N/A
THE.6	Appendix 11.3	Non-Designated Heritage Assets	Noted – no comment.	N/A
THE.7	Appendix 11.4	Historic Environment Record Previous Events Data	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
THE.8	Chapter 11: Terrestrial Historic Environment	Figures 11-1 to 11-5	Noted – no comment.	N/A
Environmental Assessment Topic: Marine Historic Environment				
EIA Scoping Report Volume I: Main Report				
MHE.1	12.1 to 12.9	Marine Historic Environment Chapter	No comment. Matters in relation to the marine historic environment are deferred to Historic England.	N/A
EIA Scoping Report Volume II: Appendices				
MHE.2	Appendix 12.1	Marine Heritage Environment Legislation, Policy and Guidance.	Noted – no comment.	N/A
MHE.3	Appendix 12.2	Marine Historic Environment Gazetteer	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
MHE.4	Chapter 12: Marine	Figure 12-1	Noted – no comment.	N/A

	Historic Environment			
Environmental Assessment Topic: Traffic and Access				
EIA Scoping Report Volume I: Main Report				
TA.1	13.1 to 13.9	Traffic and Access Chapter	It is acknowledged that a range of construction, operation, and decommission effects have been Scoped In. Matters in relation to traffic and transport are deferred to the Local Highway Authority and National Highways. Any comments provided by the Council in respect of this matter are high-level observations.	N/A
TA.2	13.2.2	Study Area	Notwithstanding the caveat provided in the Scoping Report that the highways listed are not expected to be exhaustive, the A146 is a key east to west movement corridor within the north of the district and so should be included.	N/A
TA.3	13.4.22	Baseline Environment	The Scoping Report states: "Additional local and recommended cycle routes also provide connections. These are shown in Figure 13-5." The key to Figure 13-5 only refers to National Cycle Network (NCN) routes. There is no reference to, or consideration of, local cycle routes or recommended cycle routes. The Council has adopted a Walking and Cycling Strategy (October 2022) (Cycling and Walking Strategy.pdf) which, among other matters, identifies important local cycle routes and opportunities to create new and improved cycle infrastructure. The applicant should given consideration to the local routes identified in the Walking and Cycling Strategy, in addition to the recommended improvements, as there may be opportunities for the project to contribute towards the enhancement of the local and national network. There is an interactive version of the Walking and Cycling Strategy, including arcGIS maps of Recommendations, Key Corridors, Community Recommendations, and Leisure Routes, which can be viewed here: East Suffolk Cycling and Walking Strategy	N/A

EIA Scoping Report Volume II: Appendices				
TA.4	Appendix 13.1	Traffic and Access Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
TA.5	Chapter 13: Traffic and Access	Figures 13-1 to 13-5	With regards to Figure 13-5, see above comment at TA.3 in relation to the absence of reference, or consideration of, local cycle routes and local cycle route recommendations.	N/A
Environmental Assessment Topic: Noise and Vibration				
EIA Scoping Report Volume I: Main Report				
NV.1	14.2.1 to 14.4.32	Study Area and Baseline Environment	The Baseline Study Areas are broadly acceptable, however, there are a number of elements associated with this project, and these are situated in areas of variable background sound levels dependent on location. All assessments must be undertaken with some degree of flexibility taking account of any location specific issues if they are found to ensure the assessments are representative. If significant impacts are predicted at the outer boundaries of these areas, they should be extended to ensure that the assessment captures all relevant Noise Sensitive Receptors. Whilst the study areas are accepted, this will not prejudice complaints from Noise Sensitive Receptors from further afield, in the event that the project is consented and implemented, should they be received. Further detail of the Study Areas within East Suffolk to be considered should be agreed with the Council prior to undertaking the assessments. The scoping process relies on DEFRA noise mapping. This should be used as an informative source of information at this stage only and should not be relied upon at the expense of adequate and appropriate assessment. The applicant has stated its use is for indicative purposes, and this is accepted until such a time as adequate specific data is available.	N/A
NV.2	14.5.1 to	Likely Significant Effects	The Scoping Report indicates the potential for significant adverse impacts	N/A

	14.5.6		to occur across the project in a number of locations. How these impacts are to be avoided should be carefully considered and addressed in accordance with guidance and policy. Furthermore, through the project the applicant must identify, consider and address adverse impacts, demonstrating how they are mitigating and minimizing those adverse impacts in line with guidance and policy. The applicant must robustly justify how they are ensuring that all significant adverse impacts are being avoided and that all adverse impacts are being mitigated and minimised in order to show that noise and vibration resulting from the construction, operation and decommissioning of the development is as low as can be reasonably achieved as required by relevant guidance, standards, policy and legislation.	
NV.3	14.6.1 to 14.6.3	Impacts Scoped Out of the Assessment	The Scoping Report indicates that some elements of operational noise and vibration are to be scoped out as they are unlikely to result in significant adverse effects. The Council disagrees with these conclusions in the absence of evidence to support the position. All elements of operational noise and vibration should be assessed to demonstrate where there are, and are not, significant adverse effects. Furthermore, as stated above, it is not sufficient to simply consider significant adverse effects, the applicant must also consider the mitigation and minimisation of adverse effects, and to do so all elements of operational noise and vibration should remain within the scope of the EIA. Adequate assessment is essential not only in avoiding significant adverse impacts, but also for informing project design, in terms of the location of development, in addition to ensuring that mitigation is identified at an early stage, so that all impacts are as low as they reasonably can be.	Operational phase noise and vibration should be Scoped In.

			Unless it is very clear that there will be no impact, the assessment should be carried out to identify where impacts will occur, as well as how these impacts will be addressed, in addition to demonstrating and justifying where impacts are not predicted to occur. It is easier to identify a solution to a problem at an early stage than it is to reverse engineer a solution, this opportunity should not be missed by scoping these areas out.	
NV.4	14.7.2	Proposed Approach to Mitigation	It is fundamental that the applicant understands that it is not just significant adverse effects that they need to control, they must also actively demonstrate that they are mitigating and minimising adverse effects, as well as reducing any effect identified to the lowest reasonable level. The project must establish in detail what its impacts are and incorporate necessary measures to mitigate against them, including, but not limited to, the location and layout of development; the use of equipment and methodologies during the construction and operation phases; and any other specific mitigation in terms of engineering and management solutions.	N/A
NV.5	14.8.1 to 14.8.16	Proposed Approach to the ES Assessment Methodology	In terms of construction noise and vibration, the project has committed to the controls within BS5228-1 and 2 which is welcomed and accepted. The Council would request that any assessment is carried out to the 'ABC' Methodology in line with other NSIP projects in the District. The Council also welcomes the commitment to Best Practicable Means principles and request that this underpins a Construction Noise and Vibration Management Plan detailing construction noise and vibration controls. The applicant should consider the use of a Control of Pollution Act 1974, Section 61 "prior consent" application to continuously demonstrate its compliance with the commitment to Best Practicable Means principles. The Scoping Report contains Table E.1 from Annex E.3.2 of BS5228-1 (the	N/A

			'ABC' Methodology) so it is assumed the intention is to use this part of the standard, however, this should be made clear in subsequent documents. In terms of vibration, the Council accepts the use of the relevant standards, however, it is requested that the applicant selects an appropriate level to base its controls on. The Council would propose 1mms ppv in alignment with the relevant standard in terms of nuisance and the approach taken with other NSIPS in the District. The applicant should outline how it intends to ensure compliance with this approach considering all options for vibration control contained in BS5228-2 and other relevant standards. In terms of construction traffic on the highway network, the Council defers to the relevant Highway Authority. The applicant has proposed BS4142:2014+A1:2019 methods for rating and assessing industrial and commercial sound (BS 4142) in respect of the operational noise assessment and this is accepted. The Council's current stance on noise for developments of this nature is captured in the following condition used in relation to Town and Country Planning Act applications, but is equally relevant here and has been stated for other DCO projects within the District: *Noise from fixed plant or machinery (e.g. heat pumps, compressors, extractor systems, fans, pumps, air conditioning plant or refrigeration plant) can be annoying and disruptive. This is particularly the case when noise is impulsive or has tonal characteristics. A noise assessment should therefore be submitted to include all plant and machinery and be based on BS4142:2014. A rating level (LAeq) of at least 5dB below the typical background (LA90) should be achieved. Where the rating level cannot be*	

			achieved, the noise mitigation measures considered should be explained and the achievable noise level should be identified and justified. Due to the site of this project, the 5dB below background level is an aspirational target and one we would ask the applicant to consider as the appropriate limit. Deviation from this level will require robust justification and the aim in such circumstances, as with all cases, should be to achieve the lowest possible reasonable noise level, which will also require robust justification. The applicant is reminded of the overarching objective of relevant noise and vibration policy, particularly the requirement to mitigate and minimize noise impacts. The overall expectation in respect of operation noise is that a robust assessment will be undertaken in accordance with BS4142. An appropriate rating level should be established by reference to a representative background sound level and should inform the design and mitigation strategy, with the objective of reducing noise impacts to the lowest practicable level. This is expected to necessitate a requirement within the DCO. Depending on the rating level ultimately proposed, a further requirement may also be necessary to secure additional reductions should opportunities arise during the detailed design and implementation stages. The importance of minimising operational noise impacts cannot be overstated, and robust justification will be required before agreement can be reached on any proposed noise limits.	
EIA Scoping Report Volume II: Appendices				
NV.6	Appendix 14.1	Noise and Vibration Legislation, Policy and Guidance	Noted – no comment.	N/A
Environmental Assessment Topic: Air Quality and Odour				
EIA Scoping Report Volume I: Main Report				
AQO.1	15.1 to 15.9	Air Quality and Odour Chapter	The Scoping Report currently scopes all matters to do with Air Quality, Dust and Odour into the assessments for the Environmental Statement	N/A

			and this is welcomed by the Council. The applicant should ensure that the assessments consider the cumulative impacts and effects with other major projects in the area. There should also be an overarching aim to reduce individual and cumulative emissions/impacts on local air quality wherever possible, regardless of the outcome of any assessments undertaken or compliance with regulatory and guidance levels. A Dust Management Plan should be provided in respect to the control of construction dust, and, in the currently unlikely event odour is assessed to be a concern, an Odour Management Plan should also be provided.	
EIA Scoping Report Volume II: Appendices				
AQO.2	Appendix 15.1	Air Quality Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
AQO.3	Chapter 15: Air Quality and Odour	Figures 15-1 to 15-2	Noted – no comment.	N/A
Environmental Assessment Topic: Climate Change				
EIA Scoping Report Volume I: Main Report				
CC.1	16.4.9	Baseline Environment	The Scoping Report acknowledges that there are existing agricultural practices within the EIA Scoping Area that will be expected to produce GHG emissions. However, the applicant has not considered agricultural developments in the long list of cumulative sites. Existing and foreseeable agricultural developments should be identified to inform the assessment of local GHG emissions.	N/A
CC.2	16.5.8	Likely Significant Effects	The Scoping Report identifies heatwaves and flooding events as potential climate-related risks. However, consideration should also be given to the increasing risk of wildfires. The summer of 2026 saw a notable rise in wildfire incidents both nationally and locally, including a significant wildfire at Dunwich Heath in August, which was declared a major	N/A

			incident.	
CC.3	16.6	Impacts Scoped Out of the Assessment	It is acknowledged that there are uncertainties regarding the scale, nature, and timing of development that may ultimately be enabled by the project. However, in light of the current moratorium on new non-domestic water connections in the Hartismere Water Resource Zone, there appears to be a reasonably clear relationship between the proposed development and the unlocking of development that is currently prohibited from proceeding. For instance, Objective 1 of the development, as stated at paragraph 1.2.2 of the Scoping Report, is: *"To meet the urgent need to increase the supply of potable water to Hartismere Water Resource Zone ('WRZ')"* To that extent, it is considered that the potential for indirect emissions associated with such development may warrant further consideration. The adequacy of the proposed approach to indirect emissions is therefore a matter on which the Planning Inspectorate may wish to provide further direction through the scoping opinion.	N/A
EIA Scoping Report Volume II: Appendices				
CC.4	Appendix 16.1	Climate Change Legislation, Policy and Guidance	Noted – no comment.	N/A
Environmental Assessment Topic: Socio-economics				
EIA Scoping Report Volume I: Main Report				
SE.1	17.1.3	Introduction	The Council recognises the requirement to draw on the National Policy Statement for Water Resources Infrastructure (NPSWRI) to guide the scope of the proposed socio-economic assessment, but notes that the latest version is dated July 2025, not 2023. It should also be recognised that the identified scope of potential impacts taken from the NPSWRI and listed at 17.1.3 provides guidance only, it is	N/A

			not an exhaustive list. Additional, perhaps unforeseen, potential impacts may need to be Scoped In during development of the ES.	
SE.2	17.1.4	Introduction	The potential impact on housing availability should also be considered. Demand for accommodation is expected to be greatest during the construction phase and, where insufficient housing is available to meet workforce needs, increased pressure may be placed on tourist accommodation. The presence of other NSIPs within the district has already contributed to short-term accommodation pressures, reducing the availability of tourist accommodation, and this situation could be further exacerbated by the proposed development.	N/A
SE.3	17.1.5	Introduction	In addition to the direct impacts attributed to visual, traffic, noise, and navigational effects, indirect or intangible effects including 'visitor perception' and resultant impacts caused by non-home-based workers on the availability of visitor accommodation (hotels, guest houses, etc.) should be included.	N/A
SE.4	17.1.6	Introduction	The Council welcomes the development of an Outline Skills and Employment Plan (OSEP) for inclusion within the ES. However, the Council would welcome the opportunity to work with the Applicant to shape the OSEP and ensure that it provides additionality to existing skills and employment strategies and programming across the Study Area.	N/A
SE.5	17.2	Study Area	The Council is broadly supportive of the approach to Study Area design. The use of multiple study areas is logical given the complexity, the multiple components of the proposed development and a large physical geography that extends across multiple local planning authorities. Baseline data sources are appropriate, but the Council would like the approach to reflect that in 3.3.4 to 3.3.7.	N/A
SE.6	17.4.8	Baseline Environment	The applicant should ensure that the annual Gross Value Added (GVA) generated during both the construction and operational phases is included within the ES.	N/A
SE.7	17.4.15 to 17.4.22	Baseline Environment	In relation to tourist accommodation stock, the Council maintains its own database providing information on current visitor numbers, related	N/A

			employment, and accommodation stock within the district and its surrounds. Project and non-home based worker effects on accommodation availability and the wider visitor economy is of great concern to the Council and it is strongly encouraged that the Applicant arranges to meet with the East Suffolk Economic Development Team (Tourism) to discuss further.	
SE.8	17.4.23 to 17.4.42	Baseline Environment	With regards to the Local Study Area and Hyper Local Study Area, the Council is broadly in agreement with the datasets used within the socio-economics chapter of the Scoping Report. However, within the time available to respond, it has not been possible to fully review data sources, the accuracy of the data used, and the analysis presented within the Scoping Report.	N/A
SE.9	17.5.4 to 17.5.6	Likely Significant Effects	The employment opportunities supported by the proposed project need to be fully understood, and the means by which these opportunities are accessible to a local workforce needs to be embedded within the planned OSEP.	N/A
SE.10	17.5.7 to 17.5.10	Likely Significant Effects	The Council will look for comprehensive mitigation strategies for businesses adversely affected, whether temporarily or permanently, by the project. Positive Effects on businesses such as supply chain opportunities during the construction and operational phase need to be clearly understood and the mechanisms to realise these opportunities should be appropriately articulated. The Council considers it important to understand how local businesses and the economy will benefit from the improved water supply following construction and during the Operational phase.	N/A
SE.11	17.5.12	Likely Significant Effects	Potential adverse effects on visitor accommodation caused by non-home-based workers are very concerning, particularly if the construction phase	N/A

			overlaps with other significant NSIP construction activities locally.	
SE.12	17.5.13	Likely Significant Effects	New businesses and business growth is currently constrained in certain areas due to enforced water restrictions. The benefits for business resulting from the proposed project should be thoroughly articulated and 'Scoped In' to the assessment.	The operational phase benefits for businesses should be Scoped In.
SE.13	17.6	Impacts Scoped Out of the Assessment	With the exception of the Council's recommendation that operation phase benefits for businesses be Scoped In (see SE.12), the Council broadly agrees with the impacts scoped out of the assessment during the Operational phase of the proposed project. It is disappointing that the proposed development, despite its scale, will not provide opportunities in support of education or visitor facilities locally.	N/A
SE.14	17.7	Proposed Approach to Mitigation	The Council is reassured that the approach to mitigation is aligned with relevant guidance and standards.	N/A
SE.15	17.7.3 to 17.7.4	Proposed Approach to Mitigation	The OSEP statement and intended aim of maximising public benefit resulting from the proposed development is welcome. The Council's Economic Development Team would welcome further consultation opportunities to discuss any further secondary mitigation measures identified during the preparation of the socio-economics chapter of the ES.	N/A
SE.16	17.8	Proposed Approach to ES	The Council is broadly supportive of the methodology proposed in Table 17.22.	N/A
EIA Scoping Report Volume II: Appendices				
SE.17	Appendix 17.1	Socio-Economics Legislation, Policy and Guidance	Noted – no comment.	N/A
Environmental Assessment Topic: Human Health				
EIA Scoping Report Volume I: Main Report				
HH.1	18.1 to 18.8	Human Health Chapter	There is an existing and growing concern in local communities about the individual and cumulative impact of infrastructure projects in the District	N/A

			on health and wellbeing. The Council is sympathetic to these concerns and agrees with the applicant that Human Health should be Scoped In. It is welcomed that the applicant recognises the impact that major infrastructure projects can have on mental health and wellbeing through changes in community resilience, perceived control and ability to influence decision-making. Similarly, due to the sustained exposure of communities in the area to multiple NSIPs, the applicant also recognises that the proposed development could "contribute to ongoing experiences of change of and uncertainty and may reinforce perceptions of reduced influence over aspects of the local environment and future community conditions." The overall commitment to qualitatively assess the health and wellbeing effects of the development on local communities, including the interproject effects with other major developments, is supported. Whilst it has been produced to supplement Suffolk County Council's Energy, Water, Commercial, Transport and Climate Adaptive Infrastructure Policy, the Community Engagement and Wellbeing Supplementary Guidance Document (Energy projects and the wellbeing of communities - Suffolk County Council) is a useful resource that the applicant should take into account when establishing their approach to meaningful engagement with local communities. Additionally, Mind Suffolk has produced a report, in collaboration with East Suffolk Council, to understand the mental wellbeing of the communities living in Aldeburgh, Leiston, and Saxmundham, given the concentration of multiples NSIPs in the locality. This can be viewed here: Wellbeing in Aldeburgh, Leiston & Saxmundham 2025	
EIA Scoping Report Volume II: Appendices				

HH.2	Appendix 18.1	Human Health Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
HH.3	Chapter 18: Human Health	Figures 18-2 to 18-7	Noted – no comment.	N/A
Environmental Assessment Topic: Ground Conditions				
EIA Scoping Report Volume I: Main Report				
GC.1	19.1 to 19.9	Ground Conditions Chapter	An assessment of ground conditions to locate, identify and resolve any potential land contamination should be undertaken to relevant standards and in accordance with relevant guidance such as Land Contamination Risk Management. The Applicant has engaged with the Council on this matter. They should be confident that they have adequately assessed the risk of contamination within the area of the project prior to commencement, and that any contamination that is known is appropriately addressed. That said there remains the potential for unexpected contamination to arise during the course of development and the applicant should ensure that the Code of Construction Practice, and any relevant management plans that sit under it (such as the Soil Management Plan), contain a robust discovery strategy to cover that event. The Council's standard planning condition for unexpected contamination covers the necessary requirements and should form the basis of this discovery strategy: *"Unexpected Contamination* *In the event that contamination which has not already been identified to the Local Planning Authority (LPA) is found or suspected on the site it must be reported in writing immediately to the Local Planning Authority. Unless agreed in writing by the LPA no further development (including any construction, demolition, site clearance, removal of underground tanks*	N/A

			and relic structures) shall take place until this condition has been complied with in its entirety. *An investigation and risk assessment must be completed in accordance with a scheme which is subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons (see Annex 2 of the National Planning Policy Framework) and conform with prevailing guidance (including BS8485:2015+A1:2019, BS 10175:2011+A2:2017 and Land Contamination Risk Management) and a written report of the findings must be produced. The written report is subject to the review and confirmation in writing by the Local Planning Authority that likely risks have been identified and will be investigated accordingly.* *Where remediation is necessary a detailed Remediation Strategy (RS) must be prepared, and is subject to the review and confirmation in writing by the Local Planning Authority as likely to address the risks identified. The RS must include detailed methodologies for all works to be undertaken, site management procedures, proposed remediation objectives and remediation criteria. The RS must be carried out in its entirety and the Local Planning Authority must be given two weeks written notification prior to the commencement of the remedial works. Following completion of the remediation strategy a verification report that demonstrates the effectiveness of the remediation must be submitted to, reviewed by and confirmed in writing by the LPA as likely to have addressed the risks identified."* The Scoping Report concludes that further assessment in relation to ground conditions and that this will be undertaken and presented in the submitted Environmental Statement which is accepted. Should land contamination be identified through subsequent site investigations, or should any unexpected contamination be encountered at a later stage,	

			the applicant shall inform and consult the Council and the Environment Agency to agree appropriate remediation measures before development continues in the affected area.	
EIA Scoping Report Volume II: Appendices				
GC.2	Appendix 19.1	Ground Conditions Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
GC.3	Chapter 19: Ground Conditions	Figures 19-1 to 19-3	Noted – no comment.	N/A
Environmental Assessment Topic: Agricultural Land and Soils				
EIA Scoping Report Volume I: Main Report				
ALS.1	20.1 to 20.11	Agricultural Land and Soils Chapter	It is acknowledged that the construction and decommission effects on agricultural land and soil have been Scoped In, with the operation phase effects Scoped Out. It is welcomed that the applicant has committed to implementing measures to reduce disruption to ongoing agricultural and forestry operations during construction, with the detail to be defined as the as design of the development evolves. The Council expects the applicant to work closely with landowners and the farming community to ensure that any such measures are appropriate and robust.	N/A
EIA Scoping Report Volume II: Appendices				
ALS.2	Appendix 20.1	Agricultural Land and Soils Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume III: Figures				
ALS.3	Chapter 20: Agricultural Land and Soils	Figures 20-1 to 20-2	Noted – no comment.	N/A

Environmental Assessment Topic: Materials and Waste				
EIA Scoping Report Volume I: Main Report				
MW.1	21.1 to 21.9	Materials and Waste Chapter	Noted – no comment.	N/A
EIA Scoping Report Volume II: Appendices				
MW.2	Appendix 21.1	Materials and Waste Legislation, Policy and Guidance	Noted – no comment.	N/A
EIA Scoping Report Volume II: Figures				
MW.3	Chapter 21: Materials and Waste	Figure 21-1	Noted – no comment.	N/A
Environmental Assessment Topic: Major Accidents and Disasters				
EIA Scoping Report Volume I: Main Report				
MAD.1	22.1 to 22.9	Major Accidents and Disasters Chapter	Noted – no comment.	N/A
EIA Scoping Report Volume II: Appendices				
MAD.2	Appendix 22.1	Major Accidents and Disasters Legislation, Policy and Guidance	Noted – no comment.	N/A
Environmental Assessment Topic: Cumulative Effects Assessment				
EIA Scoping Report Volume I: Main Report				
CE.1	23.1 to 23.4	Cumulative Effects Assessment Chapter	The Council welcomes the consideration of both inter-project and intra-project cumulative effects and agrees that this will be of particular importance given the number of major infrastructure projects being progressed within the District and wider area. The Council is broadly supportive of the cumulative effects assessment, subject to the further comments provided below, and the proposed zones of influence. However, the robustness of the assessment methodology will depend on the analysis and interpretation of the findings.	N/A

			The Council encourages ongoing engagement with stakeholders and the promoters of other major projects throughout the EIA and DCO process, both to identify and assess cumulative effects and, where practicable, to realise opportunities for coordination and mitigation that could reduce cumulative impacts.	
CE.2	Table 23-2	Cumulative Assessment Methodology	Table 23-2 refers to various proposed Zones of Influence (ZoI) beyond 5km. However, the long list of other existing and or approved developments, do not extend beyond the 5km ZoI. It is queried whether other existing and or approved developments beyond 5km from the Order limits area have been adequately assessed in relation to effects that have a greater spatial scope.	N/A
CE.3	23.4.4 to 23.4.6	Cumulative Assessment Methodology	Paragraph 23.4.4 outlines the parameters applied to the identification of developments for the long list. The criteria applied relate to applications within the 5km ZoI for developments of more than 50 units or 10,000m^2 of commercial floorspace. The long list presented in Appendix 23.1 also includes solar schemes. Paragraph 23.4.6 notes that the long list has not been restricted to development of the same type as the Proposed Development. As the project falls primarily within rural parts of the District, consideration should also be given to the inclusion of agricultural development within the cumulative effects assessment. For example, intensive livestock developments are capable, depending on their scale, nature, and location, of giving rise to significant environmental effects in their own right, including impacts related to traffic generation, air quality, odour, designated sites, and greenhouse gas emissions, amongst other considerations.	N/A
EIA Scoping Report Volume II: Appendices				
CE.4	Appendix	Cumulative Effects	Table 23-1-1 provides a long list of developments identified by the	N/A

	23.1	Assessment – Long List of Developments	applicant for inclusion within the cumulative effects assessment. The Council is committed to working collaboratively with the applicant to ensure that the list remains comprehensive and up to date as the project progresses. Based on an initial review of Figures 23-1 to 23-2 against the Council's Public Access records, a number of applications have been identified within the 5km ZoI that do not appear to have been captured within the current long list. These are as follows: • DC/25/4801/SCO - Land North And South of Walpole Road, Halesworth: Request for Scoping Opinion for up to 640 dwellings, access, public open space and associated infrastructure. • DC/25/2109/FUL - Redisham Hall Farm, School Road, Ringsfield, Beccles: Construction of solar photovoltaic farm of up to 42MW and associated ancillary infrastructure including; new access tracks, transformers, control room, DNO building, customer building, perimeter fencing with CCTV cameras and access gates, landscaping and associated site works. • DC/26/2881/SCO - Land North of Beccles Road, Carlton Colville: EIA Screening Opinion - Outline planning application for up to 500 dwellings on land to the north of Beccles Road, Carlton Colville • DC/26/2769/EIA - Land Off Ringsfield Road, Beccles: EIA Screening Opinion - Residential development of up to 270 dwellings, together with public open space, suitable alternative natural greenspace (SANG) and associated infrastructure. • DC/26/1543/FUL - Land South East of The Street, Barnby: The erection of 50 residential dwellings, public open space, infrastructure and associated works.	

			• DC/21/0671/FUL - Land West of London Road - Hybrid planning application: (i) full planning application - residential development of 150 dwellings (including affordable) together with public open space, roads, accesses, parking, garages, drainage and associated infrastructure; and (ii) outline planning application for a phased development - six serviced self-build plots with associated access and infrastructure. Application is a partial re-design of existing planning permission DC/18/4312/FUL. • DC/23/1259/SCO - Shipmeadow Solar Farm, The Hill, Shipmeadow - Proposed solar farm development. • DC/25/1433/EIA - Land At Abbey Road, Bungay: EIA Screening Opinion - Proposed development for a Solar Farm and Battery Energy Storage System (BESS) • DC/22/3313/FUL - Land To The North Of Gray's Lane, Wisset: Temporary ground mounted solar photovoltaic (PV) farm with battery energy storage; along with continued agricultural use, ancillary infrastructure, security fencing, landscaping provision, ecological enhancements and associated works. • DC/25/4914/OUT - Land West Of Norwich Road, Halesworth: Outline Application (with all matters of reserved) (except for the means of vehicular access from Norwich Road) for a phased development of up to 105 residential properties, including all associated open space, servicing, parking, infrastructure, utilities, and landscaping. The Council is currently undertaking a more comprehensive review of planning applications that may warrant inclusion within the long list. However, given the substantial number of applications submitted and	

			determined within the ZoI within the last five years, and the time-intensive nature of this exercise, the list of additional applications identified above should not be regarded as exhaustive. Further applications may be identified through ongoing review and engagement with the applicant, and the Council therefore reserves the right to provide additional comments on the completion of the cumulative effects assessment long list as the EIA process progresses.	
EIA Scoping Report Volume III: Figures				
CE.5	Chapter 23: Cumulative Effects Assessment		No additional comments – see comments at CE.4 above.	N/A

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Dear Ms Deery,

Thank you for consulting EcoPower Suffolk, as per your letters dated 2 September and 9 September 2026, in relation to the EIA Scoping Consultation for the Suffolk Water Recycling Transfer and Storage Project (SWRTS).

We have undertaken a high-level review of the project documentation comprising the EIA Scoping Report and wish to note the interactions and overlaps of SWRTS with the draft Order Limits of EcoPower Suffolk, as well as confirming details of engagement between the two projects to date.

EcoPower Suffolk Solar

EcoPower Suffolk comprises the construction, operation, maintenance and decommissioning of a new solar farm with a generating capacity over 100 megawatts, Battery Energy Storage System and Associated Development, along with underground cabling and grid connection infrastructure to connect to a new National Grid Substation at Yaxley.

The project is located in Mid Suffolk and is made up of five areas of land south and east of Stuston, north and east of Eye, north of Gislingham, north of Occold, and between Thrandeston and Mellis. EcoPower Suffolk will also include underground cabling to connect the five areas to one another, as well as the point of connection at the new National Grid Substation at Yaxley.

EcoPower Suffolk is intending on submitting its DCO Application to the Planning Inspectorate in March 2027.

Relationship with SWRTS

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EC2V 6HR

As set out within Appendix 23.1 of SWRTS' EIA Scoping Report, EcoPower Suffolk has been identified as a cumulative scheme within the long list of developments and there is a partial overlap of the EIA scoping area and EcoPower Suffolk draft Order Limits to the west of the A140 near Thrandeston, Mellis and north of Yaxley, as well as west of the A140 near Brome.

As a result of this intersect, EcoPower Suffolk and SWRTS have been engaging to understand how the cross over between the two projects can be managed. Discussions to date have been focused on SWRTS avoiding EcoPower Suffolks proposed solar development area. EcoPower Suffolk expect that this approach would be continued in future engagement.

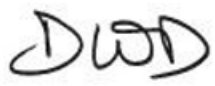
Paragraph 2.4.2 of SWRTS' EIA Scoping Report indicates that construction of SWRTS is expected to commence in 2029 and span approximately 3 years. Construction of the main project components, including the proposed western service reservoir is anticipated to commence in Q4 2030 and be completed by 2031, with the distribution main and pipelines due to be constructed between Q4 2029 and Q3 2031. As set out within Section 2.5 of EcoPower Suffolks Preliminary Environmental Findings report, construction of its project is expected to take approximately 30 months, commencing at the earliest towards the end of 2028 and completing by early to mid-2031.

SWRTS' proposed Outline Construction Traffic Management Plan and Outline Construction Environmental Management Plan should take into account the expected construction strategy and phasing of EcoPower Suffolk. EcoPower Suffolk would welcome further engagement with the project team to ensure aspects such as construction phasing and construction traffic routing are aligned between the projects to minimise disruption to the local highway network and nearby receptors.

We would request that EcoPower Suffolk are kept full informed of the progress of the Application and are included in any further engagement.

Should you have any queries, please do not hesitate to contact Laura Tinker (laura.tinker@dwd-ltd.co.uk).

Yours Faithfully,



DWD – on behalf of EcoPower Suffolk

creating a better place
for people and wildlife

Environment Agency

Planning Inspectorate

Sent via email
SuffolkWRTS@planninginspectorate.gov.uk

Reference: OR-0011515/01
Customer reference: WA0210003

02 October 2026

EIA SCOPING OPINION: application by Essex and Suffolk Water (the applicant) for an order granting consent for Suffolk Water Recycling, Transfer and Storage.

Dear Sir/Madam,

Thank you for Consulting the Environment Agency (EA) on the Environmental impact Assessment (EIA) Scoping Opinion for the proposed development. We have reviewed the Environmental Impact Assessment (EIA) Scoping Report insofar as it relates to our remit.

We broadly agree with the topics proposed to be scoped into the Environmental Impact Assessment. However, we do not agree that sufficient information has been provided to support all aspects of the proposed scope, and further assessment is required in several areas. We also do not agree that heat should be scoped out at this stage, as insufficient information has been provided regarding discharge temperatures and the potential impacts on receiving waterbodies and associated aquatic receptors.

In particular, we consider that further assessment is required regarding:

- Flood risk, including reservoir breach, emergency drawdown and infrastructure resilience;
- Water quality, fisheries and Water Framework Directive impacts associated with the proposed River Waveney discharge and downstream abstraction system;
- Marine, coastal and transitional waterbody impacts associated with the Long Sea Outfall;
- Groundwater, contamination and dewatering impacts; and
- Climate change and temperature-related effects on aquatic receptors.

Key points are summarised below, and detailed comments are provided in Appendix 1. Informatives and advice for the applicant are provided in Appendix 2.

1. **Flood Risk**

Key potential impacts that have not been considered are:

- impact of flooding on the operation, functionality and resilience of the proposed infrastructure.
- impacts of the Proposed Development on existing flood risk management assets
- impacts from reservoir breach or failure
- impacts from emergency drawdown of Service Reservoirs

2. **Biodiversity –**

- Lack of clarity regarding the assessment of intertidal species and habitats.
- Assessment of aquatic invasive non-native species
- Lack of clarity regarding the requirements for WFD assessment/ mitigations in addition to those required for EIA.
- The risk of wildfires has been scoped out
- Potential impacts from drilling fluid breakout in intertidal zone have not been identified.

3. **Fisheries –**

Key potential impacts that have not been adequately considered are:

- Potential impacts from the River Waveney abstraction need further consideration
- The 2km zone of influence may be insufficient for some fish species
- Assessment of certain in-combination effects needs further consideration
- Impact of noise on freshwater fish has not been assessed.
- Potential impacts from the LSO and AWRP need further consideration.

4. **Hydromorphology**

- The potential impact on hydromorpholoy of a drilling fluid breakout has not been considered.

5. **Water Resources-**

- Methodologies for key scoped-in assessments has not been outlined.
- Consumptive water demands have not been evaluated

6. **Groundwater and Contaminated Land**

Key potential impacts that have not been considered are:

- Effects of dewatering and drainage on peat soils during the operational phase

- Impacts from decommissioning activities on contamination arising from operational activities.
- Insufficient search radius for ground conditions

7. **Water Quality and Permitting:**
    - The scoping report does not adequately refer to the modelling, monitoring and permitting requirements for water quality. Close consultation with the Environment Agency should continue to support the progress of the application through the RAPID gated process. If the need for modelling is missed, then data may not be available or timeframes for assessment may be significantly limited.

Please note this response does not represent our final view in relation to any future Development Consent Order (DCO), or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

We look forward to continuing to work with you as the detailed proposals continue to develop, and to review and provide advice on relevant supporting documents as these are generated.

Yours faithfully

[redacted]
Planning Specialist – National Infrastructure Team

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Appendix 1 – Detailed comments on the EIA scope

1. Flood Risk

FR01: Impact of flooding on development operation and resilience

Document Reference(s): Chapter 9	
Issue	The EIA Scoping Report does not explicitly scope in or out an assessment of how flooding could affect the operation, functionality and resilience of the proposed infrastructure.
Impact	Flood events may compromise the safe operation, accessibility, integrity and resilience of infrastructure throughout its operational life. Failure to assess this risk could result in unacceptable operational disruption, service interruptions, increased maintenance requirements, or damage to critical assets during flood events.
Solution	The EIA should scope in an assessment of the impacts of flooding on the proposed development, including consideration of the vulnerability and resilience of all key infrastructure components to all sources of flood risk (including residual risk). Appropriate mitigation and adaptation measures should be identified where necessary.
Additional narrative/ explanation The assessment should demonstrate that the development can remain operational and resilient throughout its design life under current and future climate change scenarios and should be consistent with the findings of the Flood Risk Assessment (FRA).	

FR02: Impacts on Existing Flood Defences and Coastal Protection Infrastructure

Document Reference(s): Chapter 9	
Issue	The EIA does not adequately consider the potential impacts of the Proposed Development on existing flood risk management assets, coastal defences and protection infrastructure. Paragraph 9.4.64 identifies the presence of sea defences including revetments, rock armour and groynes throughout the study area, but their potential interaction with the proposals has not been assessed.
Impact	Construction, operation and decommissioning of the development could affect the integrity, performance, maintenance requirements or future adaptation of existing flood defences. In addition, vibration generated during construction activities may adversely affect Environment Agency flood assets and compromise their function. Any deterioration in the performance of these assets could increase flood and coastal erosion risk to surrounding communities and infrastructure.

Solution	The EIA should scope in assessment of potential direct and indirect effects on all existing flood defence and coastal protection assets. This should include assessment of construction, operational and decommissioning impacts, restrictions on future maintenance and adaptation, and a detailed vibration assessment where works are located near flood assets. Appropriate stand-off distances, vibration thresholds, monitoring requirements and mitigation measures should be identified. Flood defence assets should be treated as sensitive receptors within Chapter 14 (Noise and Vibration). Real-time monitoring should be implemented where works have the potential to generate vibration levels capable of affecting flood risk infrastructure.
Additional narrative/ explanation (if necessary) Given the sensitivity of the coastal environment, close engagement with East Suffolk Council, as the responsible coastal management authority for the area in question, is required.	

FR03: Reservoir breach or failure

Document Reference(s): Chapter 9	
Issue	The EIA Scoping Report does not fully scope in or assess reservoir breach and failure risks associated with the proposed Central Service Reservoir (CSR) and Water Service Reservoir (WSR). While dam failure is referenced within the Major Accident and Disaster chapter, sufficient consideration has not been given to flood extents, hazards, receptors or residual risks.
Impact	Failure of either reservoir could result in significant downstream flooding, environmental damage and impacts on sensitive receptors, including residential properties, businesses, transport infrastructure, utilities, COMAH sies and environmental designations.
Solution	A comprehensive reservoir breach and dam failure assessment should be scoped into the assessment. The assessment should model a range of credible and worst-case failure scenarios, including multiple potential breach locations and failure mechanisms for both reservoirs. It should identify flood extents hazard classifications, affected receptors, environmental impacts and mitigation measures. The assessment should be undertaken using a worst-case Rochdale Envelope approach where final embankment designs remain uncertain.
Additional narrative/ explanation (if necessary) The current proposal to rely on Environment Agency flood mapping and professional judgement for defining zones of influence appears insufficient given the acknowledged downstream flood risk. Residual risks, breach modelling outputs, emergency planning measures, hazard mapping and receptor impact assessments	

must be provided as a level of detail appropriate to support the DCO application and demonstrate that significant effects have been properly assessed.

FR04: Emergency Drawdown of Service Reservoirs

Document Reference(s): Chapter 9	
Issue	Emergency drawdown arrangements for the proposed CSR and WSR have not been discussed in sufficient detail and are not currently scoped into the EIA. Whilst overflow pipe arrangements are described, there is insufficient consideration of the flood risk implications associated with emergency drawdown operations or testing scenarios.
Impact	Emergency drawdown could result in increased downstream flows, flooding and environmental impacts, particularly during extreme weather conditions or coincident flood events. Without assessment, the risks to downstream receptors, infrastructure and environmental sites are unknown. Failure to understand these risks could result in unacceptable residual flood risk and inadequate emergency planning.
Solution	Emergency drawdown should be scoped into the assessment. Hydraulic modelling should be undertaken to assess a range of emergency breakdown scenarios, including operation during agreed flood events and emergency conditions. The assessment should identify downstream flood consequences, receptor impacts, operational constraints and mitigation measures required t prevent increases in flood risk elsewhere.
Additional narrative/ explanation (if necessary) Emergency drawdown should also be assessed within the Major Accident and Disaster chapter of the Environmental Statement. The assessment should consider the full range of potentially affected receptors and demonstrate that drawdown systems can operate safely and effectively under emergency and flood conditions. Failure to provide a robust assessment within the FRA may result in the FRA being considered unacceptable.	

2. Biodiversity

Bio01: Assessment of intertidal and coastal WFD receptors

Document Reference(s): Main report, Chapter 6 Terrestrial biodiversity 6.3.2 and table 6_1 and 2	
Issue	Coastal and intertidal receptors are considered across multiple chapters. Whilst this chapter identifies relevant terrestrial and coastal habitats, it is unclear how intertidal and coastal WFD biological quality elements will be considered. The scoping approach does not refer to the receptor screening requirements set out in the Environment Agency's Clearing the

	Waters for All guidance, including the need to consider higher sensitivity habitats within relevant distances of the proposed activity footprint. e.g.higher sensitivity habitats are to be scoped in if the footprint of the activity is within 500m of these habitats.
Impact	There is a risk that intertidal and coastal WFD receptors are not consistently identified and assessed across the EIA and WFD compliance assessment. This could result in potentially affected receptors being screened out prematurely and may reduce confidence that the assessment will fully address WFD requirements.
Solution	The WFD Compliance Assessment should clearly set out the scoping methodology used for WFD receptors and demonstrate alignment with the Environment Agency's Clearing the Waters for All guidance. This should include explicit consideration of coastal and intertidal biological quality elements, higher sensitivity habitats and any relevant screening distances or criteria used to determine receptor inclusion.
Additional narrative/ explanation https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters	

Bio02: Assessment of aquatic invasive non-native species

Document Reference(s): Chapter 7 Freshwater Biodiversity **Chapter 9 Water Environment** **Biodiversity Data Collection Strategy, Appendix 6.2**	
Issue	The Scoping Report does not clearly identify the methodology that will be used to assess aquatic invasive non-native species risks associated with the proposed recycled water discharge to the River Waveney and downstream abstraction system
Impact	Potential transfer and spread pathways may affect: river habitats, ditch systems, wetland habitats, designated sites
Solution	Include:aquatic INNS risk assessment methodology, screening process, pathway assessment, mitigation hierarchy, monitoring proposals, SAI-RAT (Strategic Resource Option Aquatic Invasive Non-Native Species Risk Assessment Tool).
Additional narrative/ explanation Given the proposed linkage between wastewater treatment infrastructure, the River Waveney, associated wetlands and downstream abstraction infrastructure, a clearly defined methodology is recommended. Whilst the overall risk may ultimately be low, the assessment should demonstrate how this conclusion has been reached.	

Bio03: Floating Pennywort

Document Reference(s): Chapter 7 Freshwater Biodiversity/7.4 Baseline Environment/7.4.1 INNS	
Issue	The current Floating Pennywort infestation on the R. Waveney between Scole and Brockdish falls just outside of the 2km buffer distance from crossing locations. Therefore Floating pennywort has not been identified in screening.
Impact	As the extent of the floating pennywort is extremely dynamic year to year, in subsequent years this invasive may be within the 2km buffer & hence could have implications for the proposal.
Solution	The presence of Floating Pennywort in close proximity to the proposal should be scoped in. The potential for its distribution to extend into the works area should be considered, with appropriate measures to prevent its spread during construction and operational phases.
Additional narrative/ explanation The extent of floating pennywort on the R.Waveney has dramatically increased in 2025/2026. All efforts in 2026 have now focussed on containing its U/S & D/S spread.	

Bio04: Impacts of heat

Document Reference(s): 4.2.2	
Issue	Disagree that heat should be scoped out.
Impact	Many species rely on subtle water temperature cues for breeding/migratory behaviours. Discharged water that alters the ambient temperature of a river system may negatively impact freshwater biodiversity, with subsequent effects on terrestrial biodiversity.
Solution	Provide further justification and evidence to support the decision to scope out heat impacts.

Bio05: WFD compliant mitigation

Document Reference(s): Main Report, Freshwater Biodiversity. Freshwater marine interface 7.13	
Issue	There is no detail regarding the likely mitigation measures referred to as 'WFD compliant design and operation'.
Impact	Risk that mitigation is poorly understood or inadequate.
Solution	Provide greater clarity on what is meant by 'WFD compliant design and operation'. mitigation proposed

Bio06: Risk of wildfire

Document Reference(s): Chapter 22 Major Accidents and Disasters. Chapter 16 Climate Change	
Issue	Wildfire risk is proposed to be scoped out of the assessment.

	Parts of the study area occur in proximity to habitats that may be sensitive to wildfire events, including heathland, reedbed, wetland and grazing marsh, together with designated ecological sites and habitat networks. Construction and operational activities may introduce potential ignition sources, particularly during periods of prolonged dry weather. Impacts of climate change may increase this risk.
Impact	The likelihood of wildfire may be low but potential impacts could be significant. are present. Potential impacts could include: damage to designated sites, habitat loss or degradation, impacts on protected and notable species / species assemblages.
Solution	Provide a proportionate assessment demonstrating likelihood of significant effects from wildfire. The assessment should: identify habitats and designated sites that could be vulnerable to wildfire, consider whether construction and operational activities could introduce ignition sources, assess the likelihood and consequence of wildfire events, consider cumulative effects in combination with projected climate change, drought and increased vegetation dryness, identify appropriate prevention, management and emergency response measures, determine whether significant effects could occur and whether mitigation would reduce those effects to an acceptable level.

Bio07: Risk of frac-out in intertidal zone

Document Reference(s): Chapter 8. Marine biodiversity. 8.2.8	
Issue	The risk of frac-out occurring in the intertidal zone is not recognised in the relevant chapters. 8.2.8 States "The terrestrial components of the Proposed Development are not deemed to have a marine impact..". However, Chapter 6 Terrestrial Biodiversity includes the intertidal zone.
Impact	The risk of bentonite frac out is something that could occur in the intertidal, so without evidence to the contrary, I would expect there could be an impact.
Solution	Frac out needs to be considered in the risks associated with the LSO as it passes below the intertidal zone. This means it needs to be considered in one or other of the chapters for Marine biodiversity or Terrestrial biodiversity and the related WFD assessment

Bio08: Impacts on benthic communities

Document Reference(s): Chapter 8. Marine biodiversity 8.5.7	
Issue	The impacts on water column are presented, but impacts on the benthic communities are not considered. If the discharge is denser than the surrounding water then impacts on the benthic commnuties are relevant.
Impact	Risk of unmitigated impacts on benthic communities.
Solution	Provide information on plume behaviour and ensure the impacts on benthic communities and those species that rely on substrate for their lifecycle is recognised in the risk assessment.

Bio09: Definition of marine Zone of Influence

Document Reference(s): Chapter 8. Marine biodiversity, 8.2 4 Study area	
Issue	The scoping report identifies an anticipated marine Zone of Influence of approximately 6 km associated with the discharge of concentrated residual water. No evidence is provided to justify this.
Impact	Without a clearly defined worst-case discharge envelope and transparent justification for study area extents, there is uncertainty as to whether the EIA will fully assess all likely significant effects on marine ecology, WFD receptors, protected sites and water quality. There is a risk that conclusions of no significant effect could become dependent on future permitting decisions or future design refinement, rather than being demonstrated through the environmental assessment itself. .
Solution	The ES should explain the basis for this extent and demonstrate, through modelling or other evidence, that the selected study areas (which includes any linked estuaries) adequately encompass the likely maximum extent of environmental effects.

3. Fisheries

Fish01: Scope in River Waveney abstraction point

Document Reference(s): VOLUME I: MAIN REPORT Chapter 2, paragraph 2.2.3	
Issue	Disagree that the existing abstraction point on the River Waveney is excluded from the EIA Scoping Area.
Impact	Changes in flow patterns around the intake, changes in approach velocity to the intake and changes in abstraction quantity could lead to entrainment/impingement of fish and European eel.
Solution	The existing structure should be scoped in to be able to assess any change in flow properties around the intake and to assess the level of risk posed to fish and European eel as a result of entrainment and impingement at the intake. The Eels (England and Wales) Regulations 2009 state that 17 (1) requires that any diversion structure capable of abstracting at least 20 cubic metres of water through any one point in any 24-hour period must be screened appropriately or exempted.

Fish02: Potential amendments to existing abstraction rates

Document Reference(s): VOLUME I: MAIN REPORT Chapter 2, paragraph 2.3.7	
Issue	No amendments are proposed to the existing abstraction infrastructure or permitted abstraction rate.
Impact	If the abstraction operation was required to be raised above the current permit limit this could lead to increased entrainment risk and potentially greater loss of juvenile fish.

Solution	Provide a review of abstraction requirements compared with current permit limits and compliance of the intake with the EA's Eel regulations guidance.

Fish03: Impact of heat

Document Reference(s): VOLUME I: MAIN REPORT Chapter 4, paragraph 4.2.2	
Issue	Disagree that heat should be scoped out. There could be temperature change to the River Waveney as a result of discharged water from the Advanced Water Recycling Plant.
Impact	Behavioural impacts to fish, physiological stress from high temperatures and attractant leading to increased exposure to predation and unfavourable water quality.
Solution	Provide further justification as to why the heat topic is scoped out.

Fish04: Zone of influence for fish species

Document Reference(s): VOLUME I: MAIN REPORT Chapter 7, section 7.2	
Issue	Zone Of Influence for all fish species is limited to 2km which is not adequate considering known fish behaviour
Impact	The potential impact to coarse and diadromous fish species that are able to migrate freely through connected water bodies is likely to exceed 2km
Solution	In determining the zone of influence for fish barriers to migration, the lifecycle and behaviour of species should be used to determine the Zone of influence of the scheme.

Fish05: Barriers to fish from AWRP discharge

Document Reference(s): VOLUME I: MAIN REPORT Chapter 7, paragraph 7.5.2	
Issue	Disagree that barriers or disturbance affecting fish movement or spawning behaviour will be temporary.
Impact	This could be permanent impact barrier or disturbance given the proposed discharge to the River Waveney which has a sweetening flow for the operation of the Advanced Water Recycling Plant.
Solution	Provide evidence to support the statement that disturbance or barriers to fish will be temporary from the AWRP discharge to the River Waveney. The EIA must include thermal modelling of the discharge plume and details on the water quality characteristics of the plume.

Fish06: In-combination effects on diadromous fish species

Document Reference(s): VOLUME I: MAIN REPORT Chapter 7, paragraph 7.8.21 p.169 In-combination effects.

Issue	We welcome the inclusion of "Barriers to fish movement combined with downstream habitat degradation" being considered, however the interaction with the marine environment is not transparent.
Impact	Impacts to marine and freshwater life stages of diadromous fish species could be impacted.
Solution	Consider the in-combination effect of all elements of the scheme on all life stages of the diadromous fish species that could be impacted.

Fish07: LSO impacts to fish and shellfish

Document Reference(s): VOLUME I: MAIN REPORT Chapter 8, section 8.10, Table 8-10 (Operational Phase)	
Issue	Given that options for the LSO location are still being considered we disagree that it can be concluded that the magnitude of impact to all marine fish and shellfish (including migratory and commercial species) is necessarily low.
Impact	Risk that impacts may be inadequately assessed.
Solution	Carry out an assessment that considers the receptors in the marine environment such as spawning grounds for marine fish and provide evidence to give confidence in the magnitude of impact determination. A medium impact may be more appropriate before this can be fully established.

Fish08: Potential in-combination effects for water environment

Document Reference(s): VOLUME I: MAIN REPORT Chapter 9, paragraph 9.8.18	
Issue	Potential impacts on aquatic habitats and ecosystems (as raised in chapter 7 freshwater biodiversity of this Scoping Report) may not be fully covered by the in combination assessment.
Impact	Risk that physio chemical parameters impacts on aquatic life from in combination effects are not considered..
Solution	The effect of changes to physio chemical parameters should be scoped in such as temperature, pH and dissolved oxygen.

Fish10: In-combination effects

Document Reference(s): VOLUME I: MAIN REPORT Chapter 16, paragraph 16.5.11	
Issue	It has been indicated that climate change scenarios that lead to in-combination climate impacts (ICCIs) will be assessed within each topic chapter scoped into the ES. Will this include potential impacts to both the marine and freshwater discharges?

Impact	This maybe the intention but without transparency we have concern that the potential impact to both the freshwater and marine environments may not be considered.
Solution	Provide clarity that ICCIs arising from discharges in both the marine and freshwater environment will be scoped in.

Fish11: Impacts of noise on freshwater fish

Document Reference(s): VOLUME I: MAIN REPORT General/ Summary of impacts and effects	
Issue	Potential impacts of noise on freshwater fish and aquatic life is not included in the assessment
Impact	Potential noise impacts especially to sensitive life stages could be overlooked.
Solution	Conduct a noise assessment for freshwater fish as has been suggested for marine fish (in sect 8.10)

4. Hydromorphology

Geo01: Impact of drilling fluid breakout

Document Reference(s): Table 9-37: Summary of Water Environment Scope	
Issue	Drilling fluid breakout is not mentioned in Water environment scope. This is despite the intention to use trenchless crossings for fluvial watercourses.
Impact	Risk of hydromorphological impacts to the watercourse caused by release of fine clays.
Solution	Ensure the risk to the freshwater environment from drilling fluid breakout has been scoped in, and that the risks to all potential receptors, including hydromorphology, groundwaters and surface waters, as well as the marine environment, are included and cross-referenced.
Additional narrative/ explanation (if necessary) We note that in Table 19-8: Summary of Ground Conditions Scope, the Introduction of new contamination is considered and scoped in for Controlled Waters receptors for all phases. We note that in Table 22-9 Summary of Major Accidents and Disasters Scope the major uncontrolled release of drilling fluids is included for Coastal waters.	

5. Water Resources

WR01: Unspecified assessment methodologies

Document Reference(s): Chapter 9

Issue	The methodology for the following scoped-in assessments has not been outlined in the Scoping Report.: • Changes arising from the new proposed discharge into the River Waveney and any proposed alterations to the abstraction volumes/rates of the existing Barsham WTW abstraction point near Shipmeadow. • Climate Change Risk Assessment using UKCP18 climate projections to assess the resilience of the Proposed Development to future climate change.
Impact	Without early agreement on the assessment methodology, there is a risk that: • Hydrological modelling to assess flow augmentation and re-abstraction under climate change and drought scenarios may not fully demonstrate the range of plausible impacts on aquatic ecosystems and any existing abstractors. • Key assumptions regarding climate change scenarios, drought sequences or operational rules may not align with EA's expectations. • Methodological issues may only become apparent at a late stage in the EIA process, potentially requiring additional assessment work or revisions.
Solution	Early engagement with the EA before the ES is finalised, on the proposed methodology), including: • Hydrological modelling approach to assess impacts on aquatic ecosystems and abstractors. • Climate change scenarios to be used including UKCP18 projections, timelines and proposed uncertainty analysis. • Drought period assessments. • Representation of flows and losses. • Consideration of potential sustained net increased abstraction from Barsham (within licence).

WR02: Assessment of consumptive water demands

Document Reference(s): Chapter 9	
Issue	Consumptive water demands have not been evaluated in the Water Environment chapter. The Environment agency seeks confidence that a sustainable and practical water supply has been evaluated by the applicant to meet consumptive water demands particularly during construction. These can include (but are not limited to: • Potable supply to welfare stations;

	• Dust suppression; • Wheel/concrete wash; • Concrete batching; • Drilling fluids for Horizontal directional drilling methods.
Impact	Sources of water supply available to the project can not be appraised without estimating potential demands: • Non-domestic water company supply is not guaranteed in this supply zone (see also WR informative below). Rural locations can also be hard to supply; • 3rd party tankering should be factored into the evaluation of vehicle numbers which is referenced in chapter 13 Traffic and Transport; • Surface water or Groundwater abstraction will mean that the project will be subject to the licensing restrictions relevant to the policy for the catchment;
Solution	The Water Environment chapter should provide a strategy for water supply which includes estimates of water demands, an options appraisal of sources of supply and demonstrate awareness of the limitations and potential obstacles and possible mitigations associated with each.

Additional narrative/ explanation (if necessary)

NPS EN-1 (Energy infrastructure) section 5.16.7 states:

The Environmental statement should in particular describe existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance.

Most water related construction activities, including dewatering and dust suppression are licensable activities if they abstract more than 20 m3 a day and as such, early consideration should be given to where the water can be sourced from if the water company is not the provider. New consumptive groundwater licences are not available and surface water is restricted to high flows only. The Environment agency wishes to avoid projects underestimating water availability posing problems with viability.

Where the project is in proximity to SSSIs or other designations whose operations requiring consent include abstraction or changes to surface water an groundwater levels. Any proposed abstraction or impundment may require a Habitats Risk

Assessment (HRA) to be undertaken as part of the determination of the licence required.

6. Groundwater and Contaminated Land

GWCL01: impacts on peat during Operational phase

Document Reference(s): Chapter 20, 20.6.6	
Issue	Effects of dewatering and drainage on peat soils has been scoped out at the operational phase
Impact	Pollutant release to controlled waters, loss of soils, subsidence as well as carbon emissions.
Solution	Scope in dewatering and drainage impacts on Peat at all stages.
Additional narrative/ explanation (if necessary) The presence of peaty soils in a number of development order areas has been highlighted in the groundwater sections of the hydrology chapter. As acknowledged the drainage of peaty soils can lead to oxidation, soil loss, subsidence, and carbon release. The operational impact on peaty soils is currently scoped out (20.6.6) but this does not acknowledge the potential for longer term changes in groundwater, currently scoped in as an operational concern for other receptors in table 9-37, that may lead to oxidation and loss of the peaty soils. However, this would not apply to peaty soils already drained for agricultural use as the development would not be the cause.	

GWCL02: Decommissioning scoped out

Document Reference(s): Chapter 19, 19.6.2	
Issue	Decommissioning impacts have not been scoped in
Impact	Unexpected Contamination as a result of operational activities that will have to be taken into account at decommissioning may be mobilised by decommissioning activities
Solution	Scope in decommissioning for unexpected contamination
Additional narrative/ explanation During the lifespan of the project it is foreseeable that standards for contamination will change. As such activities not considered contaminative now may be considered such at the time of decommissioning. By scoping this in, under unexpected contamination at decommissioning, the applicant can ensure robust	

procedures are in place to protect the environment and controlled waters from potential impacts at this stage while allowing for uncertainty.

GWCL03: Insufficient search radius

Document Reference(s): Chapter 19, 19.2.1	
Issue	A 250m search radius has been utilised for ground conditions.
Impact	Contamination sources that may affect the development may not be identified increasing risks to controlled surface water and groundwater
Solution	Increase search radius to 500m
Additional narrative/ explanation Due to the presence of secondary and principal aquifers there is potential for contaminations sources to have mobilised from greater distances than may be allowed for by the 250m search radius requested for ground conditions. This also does not take into account the 3 dimensional nature of geological and hydrogeological interactions where a principal aquifer bedrock geology may underlie other geology and be put at risk by activities.	

7. Water Quality

WQ01: Standby mode of AWRP

Document Reference(s: 2.3.6, 2.5.1	
Issue	The environmental impacts of the AWRP operating in standby mode have not been considered in addition to the operational discharge.
Impact	Risk of potential pollution of coastal, TRAC or surface water bodies depending.
Solution	Expand this section to acknowledge the impact and requirement for a water discharge activity permit for both standby and operational modes. Any discharge will require remineralisation as per the operational pipeline transfer water and will require a water discharge activity permit.
Additional narrative/ explanation: Note that the standby mode discharge water will require pre-app assessment during the gated process and discussion with the EA and NE.	

WQ02: Impact from Barsham WTW discharge

Document Reference(s): MAIN DOCUMENT 2.3.12	
Issue	Increase in wastewater discharge from Barsham WTW and its potential to increase its polluting load on the receiving waterbody has not been

	considered. The current water activity permit may not have adequate daily volume or concentration limits.
Impact	Risk of unmitigated impact on the receiving waterbody.
Solution	Ensure that any impacts on Barsham WTW and Walpole WTW water activity permit limits are considered.

WQ3: Reservoir overflows and drawdown discharges

Document Reference(s): MAIN DOCUMENT 2.3.15, Table 9-30	
Issue	The impact of new reservoir overflows and maintenance drawdown discharges have not been considered.
Impact	Routine planned and emergency discharges of any stored water can cause water quality pollution and impact the ecological features of a waterbody through scouring and sediment deposition.
Solution	Provide further detail to indicate that water discharge activity permits may be required for overflows, and for planned or emergency discharges to any waterbody.

WQ4: Assessment of all Long Sea Outfall options

Document Reference(s): MAIN DOCUMENT Table 2-1, 8.4.5	
Issue	The assessment and permitting of all 3 Long Sea Outfalls should be scoped in, not just Option 1.
Impact	The use of an existing LSO can still result in potential new impacts Potential for polluting matter with coastal waters, TRAC and terrestrial waterbodies.
Solution	Scope in all 3 LSO options so they are risk assessed and modelled and and the requirement for water discharge activity permit(s) is considered.
Additional narrative/ explanation: Increased discharge volumes from an existing LSO will require a variation or new water discharge activity permit. The EIA should clarify the water quality baseline data being collected following and conversations with EA to ensure monitoring is suitable to allow risk assessments to be undertaken for WFD and HRA compliance.	

WQ5: Impact on River Waveney

Document Reference(s): MAIN DOCUMENT 3.3.17	
Issue	We disagree with the statement Fig 1-3 sheet 4 of 14 "there is no impact on the River Waveney and it should be scoped out". There is a section of the River Waveney that will be impacted by the AWRP discharge and this should be scoped in.
Impact	There will be an impact on the flows between the proposed discharge point and the existing abstraction point, and also potentially on upstream and downstream water quality/WFD, not just 500m downstream. Physical modifications to the river bank from the construction of the outfall.
Solution	Monitoring and modelling of the River Waveney should be scoped in to assess the impact.

Additional narrative/ explanation (if necessary) A water discharge activity permit is required for the discharge from the AWRP pipeline into the river Waveney. Note section 9.2.2 states 500m downstream of the abstraction point on the River Waveney is being scoped in but only for potential changes, not for WQ changes.

WQ06: Impact of Heat

Document Reference(s): MAIN DOCUMENT 4.2.2, 9.6.1	
Issue	Disagree that HEAT is scoped out. Sewage discharges can be warm and temperature will be considered as part of the discharge permit. The statement in Para9.6.1 that 'No water environment impacts during the construction, operational and decommissioning phase have been proposed to be scoped out…' is wrong.
Impact	Risk of environmental impacts from increased temperature of treated water being discharged into the water environment. Potential impacts on dissolved oxygen, and potential compounding of impacts during low flows.
Solution	Temperature/Heat to be scoped in and all necessary assessments and monitoring undertaken. Ensure all chapters cross-reference accurately.
Additional narrative/ explanation (if necessary) River Waveney WFD classification 2022 temperature is good GB105034045903 Temperature (heat) is a WFD element and no change of more than 2 degrees and compliance with the WFD classification is required. Temperature impacts from discharge of water from advanced water treatment works have been considered in detail for other SRO's.	

WQ07: TRAC Waterbody

Document Reference(s): MAIN DOCUMENT 9.4.56, Table 9-3	
Issue	Waterbody GB510503410700 Bure/Yare/Waveney TRACis not scoped in as a surface water receptor for the LSO. The report references coastal water bodies and the River Waveney estuary, however the relationship between these assessments and the transitional water body is unclear Discharge permits for this waterbody have not been identified in Table 9-3.
Impact	It is difficult to determine whether all hydrologically connected WFD receptors have been appropriately considered and whether transitional water quality elements, ecological quality elements and fish receptors have been fully captured within the proposed assessment framework.
Solution	Ensure all relevant waterbodies are considered. The ES and WFD assessment should clearly identify whether the Bure, Waveney, Yare and Lothing water body is scoped in or scoped out, provide the rationale for that decision, and explain how transitional and coastal water body assessments have been delineated across the freshwater and marine chapters Amend list of permits to ensure all relevant WFD waterbodies are included.

WQ08: Impact of flocculants

Document Reference(s): MAIN DOCUMENT Table 9.32	
Issue	The impact of flocculants used for treating settled water has not been considered.
Impact	Chemicals used in the treatment of water can impact water quality and ecology if used incorrectly.
Solution	Further details of flocculant use, including type and dosage, should be integrated in the main body of the CEMP and included in the SWMP.
Additional narrative/ explanation: Note that any possible temporary water discharge activity permits will be needed before any discharge is made.	

WQ09: Lack of clarity regarding assessment of LSO WQ impacts

Document Reference(s): MAIN DOCUMENT Chapter 9, including 9.8.10	
Issue	Chapter 9 (Water Environment) identifies potential water environment effects from the Proposed Development but directs readers to Chapter 8 (Marine Biodiversity) for offshore LSO impacts. However, Chapter 8 is primarily ecology-focused and it is unclear where the principal assessment of LSO water quality and WFD effects will be undertaken.
Impact	The assessment pathway for offshore discharge impacts is unclear, making it difficult to determine whether all water quality, WFD and ecological effects have been consistently assessed. This is further confused by the fact that Section 9.8.10 states the "WFD Compliance Assessment that will be submitted as part of the water environment chapter of the ES."
Solution	Scope in LSO assessments for WFD. Clearly identify which chapter provides the lead assessment for LSO water quality impacts and explain how Chapters 8 and 9 interact to avoid gaps or duplication, for example the exclusion of the Bure, Waveney, Yare and Lothing transitional waterbody.

WQ10: Risks to the water environment during operation

Document Reference(s): MAIN DOCUMENT 2.4.6 / 2.6.5. Table 9-32	
Issue	Table 9-32 does not mention the implementation of an Outline Operational Environment Management Plan (OOEMP).
Impact	Risk of inadequate mitigation against impacts to the environment arising from operational activities including maintenance and vehicle movements.
Solution	Consider the need, and then agree with the Environment Agency the scope, for an OEMP to secure mitigation measures during operation phase.
Additional narrative/ explanation: Table 9-30 LSE during the Operational phase does include spills or leaks of fuels or other chemicals used during maintenance works but this is not carried through into any secondary mitigation.	

WQ11: Impacts on Bathing Waters

Document Reference(s): MAIN DOCUMENT 9.4.68 / Table 9-34	
Issue	It is unclear that the risk to bathing waters, as identified in 9.4.68, is adequately scoped in
Impact	There could be human health impacts if water quality of bathing waters is deteriorated.
Solution	Provide clarity that bathing waters are scoped in as a surface water receptor
Additional narrative/ explanation (if necessary)	

WQ12: Assessment of turbidity

Document Reference(s): MAIN DOCUMENT Tables 9-6 / 9-10 / 9-13/ 9-16 / 9-19 /9-21 / 9-24 / 9-27	
Issue	Tables summarise the WFD Physico-chemical Data for the WFD Catchments, but does not mention turbidity.
Impact	High turbidity levels can indicate poor water quality and may have negative impacts on aquatic ecosystems.
Solution	Applicant should consider if turbidity data is available for assessment of water quality baseline.
Additional narrative/ explanation: The Water Framework Directive (WFD) does not specify a specific limit for freshwater turbidity. However, it emphasizes the importance of monitoring and assessing water quality to ensure that freshwater bodies remain in good condition.	

WQ13: Watercourse buffers

Document Reference(s): MAIN DOCUMENT Tables 9-31 and 9-32	
Issue	Watercourse buffers are not included as a Primary or Secondary mitigation measure.
Impact	Without suitable watercourse buffers, sediment and other contaminants can more easily enter watercourses and reduce water quality.
Solution	Include the use of watercourse buffers as a mitigation measure, to be secured in environmental management plans.
Additional narrative/ explanation (if necessary) There should be a watercourse buffer of at least 10 m measured from the top of bank or water's edge for all phases.	

WQ14: Management of foul water

Document Reference(s): MAIN DOCUMENT Table 9-29	
Issue	Potential impacts on the water environment from foul drainage from welfare facilities is not identified.
Impact	Foul water could pose a risk to the water environment receptors during all phases and will deteriorate water quality unless it is managed and contained.
Solution	Foul drainage should be scoped in for all phases until containment and disposal method is finalised.

WQ15: Impact of dense brine discharge

Document Reference(s): MAIN DOCUMENT 8.5.6 - 8.5.8	
Issue	Higher brine water quality effect from the Long Sea Outfalls for any of the phases of the scheme has been scoped out
Impact	Higher density salinity water from the Long Sea Outfall could have negative effects on water quality and marine ecology in the vicinity, especially benthic creatures that will be unable to move away.
Solution	Chapter 8 should scope in risks of higher salinity discharges
Additional narrative/ explanation (if necessary)	

Appendix 2 – Informatives / Advice for Applicant

1. Flood Risk

1.1. Study Area

The flood risk study area should be sufficiently extensive to capture all potential impacts associated with service reservoir emergency drawdown and reservoir breach/failure scenarios, including the full extent of any downstream zones of influence.

1.2. Sequential Test and Exception Test

As essential infrastructure located within Flood Zone 3, the proposal must satisfy the Sequential and Exception Tests in accordance with the NPPF. The Flood Risk Assessment should clearly demonstrate compliance and show that the development will remain safe and operational during flood events, result in no net loss of floodplain storage, not impede flood flows, and not increase flood risk elsewhere. Opportunities to reduce flood risk overall should also be explored and documented.

1.3. Sequential Approach for all phases of the development

A sequential, risk-based approach should be applied throughout both the construction and operation in accordance with NPS for Water Resources Infrastructure and the NPPF. Infrastructure, compounds, stockpiles, plant and sensitive development components should be located in areas of lowest flood risk wherever practicable. Identification of Flood Zone 3b should form part of the Flood Risk Assessment and modelling work undertaken where existing information is not available within the Strategic Flood Risk Assessment.

1.4. Vulnerability Classification of the Development

The vulnerability classification of the development should be confirmed through the examination process. Pending confirmation, the Environment Agency considers the proposals to constitute essential infrastructure as defined by the NPPF Annex F, and the FRA should assess the scheme on that basis.

1.5. Assessment of future flood risk

The Flood Risk Assessment should demonstrate how flood risk will be managed over the full 80-year design life of the scheme and through decommissioning. As essential infrastructure, the applicant should assess current and future flood risk from all sources using appropriate climate change allowances and, where relevant, the Credible Maximum Scenario. Climate change considerations should be clearly incorporated into the FRA. Further guidance is available at https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances.

1.6. Flood storage compensation and flood mitigation

Development proposals that result in a floodplain loss, obstruction of flood flows, or increased flood risk elsewhere will require appropriate mitigation and, where necessary, flood storage compensation. Compensation should be provided on a level-for-level and volume-for-volume basis, located within the same hydrological catchment, and be operational before any floodplain loss occurs. The applicant

should demonstrate that permanent and temporary works, including access roads, compounds and lagoon ponds, do not impede flood flows or increase flood risk. Hydraulic modelling may support the assessment but cannot be relied upon alone to justify floodplain losses.

1.7. Flood Risk Activity Permits (FRAPs)

The applicant should identify at an early stage whether any works require a Flood Risk Activity Permit (FRAP) and advise the Environment Agency if any permit disapplication is sought through the DCO process. The project includes numerous watercourse crossings and works near Main Rivers where permitting requirements are likely to apply. A DCO does not guarantee subsequent permit approval. Further guidance is available at: Flood risk activities: environmental permits.

1.8. Crossings and Works in Watercourses

All watercourse crossings, culverts, diversions, cofferdams and in-channel works should be discussed with the relevant consenting authority at the earliest opportunity. For Statutory Main Rivers and Environment Agency assets, early engagement and FRAP requirements should be addressed before submission. Any intention to disapply Environmental Permitting Regulations should be communicated during the pre-application process.

1.9. Design Manual for Roads and Bridges (DMRB)

The applicant should note that the Environment Agency does not support the DMRB significance thresholds where they imply that increases in flood levels can be considered negligible or acceptable. The NPPF, planning practice guidance and relevant NPS requirements seek to ensure that there is no increase in flood risk elsewhere. Any increase in flood levels, groundwater impacts, surface water runoff or flood risk to receptors should be assessed against planning policy requirements rather than DMRB significance categories alone.

1.10. Flood Modelling and Data

The FRA should include robust flood modelling where required to demonstrate that the development will not increase flood risk or adversely affect flood flows, storage or conveyance. Particular consideration should be given to impacts on the River Waveney and the proposed discharge arrangements. Applicants should verify that any Environment Agency model data is fit for purpose, up to date and compliant with current standards. Early agreement of modelling methodologies, parameters and scenarios is strongly recommended. Relevant guidance includes:

- Using modelling for flood risk assessments
- River modelling standards: who they're for and how to use them
- River modelling technical standards and assessment

The applicant should also consider potential impacts form access routes, bunding and other infrastructure on flood flow routes, provide appropriate terrain modelling, and commit to update flood modelling where design changes alter flood risk. Where floodplain changes occur, evidence may be required post-construction to support updates to published flood maps.

2. Biodiversity

2.1. Bio Advice: Management of Risks from Horizontal Directional Drilling

Document Reference(s): Chapter 7 Freshwater Biodiversity/ Proposed Approach to Mitigation / 7.7.3 6.7.3 Primary (Inherent) Mitigation Marine: 8.7.4 and 8.5.6	
Issue	The use of Horizontal Directional drilling as a trenchless crossing technique to avoid sensitive habitats can still present a significant environmental risk.
Impact	Risk of direct ecological impacts on habitats and species from the release of drilling fluids within aquatic and riparian and intertidal habitats. Risk of secondary impacts associated with any subsequent clean up operation.
Solution	HDD in sensitive areas should be informed by a site-specific risk assessment and mitigation. This should include: • consideration of the location of entry and exit pits, • appropriate drilling depth to the geology/ground conditions, • robust drilling fluid management and frac-out prevention and response measures. Submit Outline HDD management plan as part of the DCO submission. Ensure EA is named consultee for subsequent detailed management plans.
Additional narrative/ explanation (if necessary) A number of high profile, ecologically damaging incidents have occured in East Anglia Area in recent years during HDD works. EA Norfolk Area team has worked closely with operators to develop their frac out plans, which has been highly beneficial.	

2.2. Bio Advice: Incomplete Water Framework classification summaries

Document Reference(s): Main Report. Freshwater Biodiversity. Table 7_6, pg 141	
Issue	The biological elements are limited to just invertebrates and fish for the TraC Bure & Waveney & Yare & Lothing waterbody. There are 2025 data and classifications available for other elements which are not included e.g. saltmarsh (which for WFD receptors includes reedbeds)
Impact	No reference to saltmarsh (which for WFD receptors includes reedbeds) in the review of classification results which risks those elements being excluded from the rest of the assessment including the WFD compliance assessment.
Solution	See Catchment data explorer for all elements assessed. Data searches need to go beyond just the fish and ecology data explorer. This does not

	hold all of the biological element data available for our more geospatial data assessments.
Additional narrative/ explanation We acknowledge the way this is written on the Water Hub makes it seem this is the place for all ecology data , we are working to get this corrected. Our saltmarsh, and macroalgae data are available as open data.	

2.3. Bio Advice: Monitoring locations

Document Reference(s): Main Report. Freshwater biodiversity Section 7.4.2.2 and Table 7_8, pg 147	
Issue	Refers only to the use of Ecology and Fish data explorer to provide monitoring locations. This may be appropriate for freshwater biodiversity monitoring locations, but not for all intertidal and marine ecological monitoring.
Impact	Risks monitoring data not being used in the rest of the assessment including evidence provided for the WFD compliance assessment
Solution	Data searches need to go beyond just the fish and ecology data explorer. This does not hold all of the biological element data available for our more geospatial data assessments
Additional narrative/ explanation We acknowledge the way this is written on the Water Hub makes it seem this is the place for all ecology data , we are working to get this text improved. Our saltmarsh, and macroalgae data are available as open data. Some of this data may be rolled over from older assessments.	

2.4. Bio Advice: Adaptive management arrangements

Document Reference(s): Chapter 7 Freshwater Biodiversity **Appendix 6.2 Biodiversity Data Collection Strategy** **Table 1.1 Summary of Proposed Data Collection** **Chapter 9 Water Environment.**	
Issue	A comprehensive programme of ecological baseline surveys and monitoring is proposed; however, the scoping report does not explain how monitoring outcomes will be used to inform operational decision-making if ecological responses differ from those predicted within the assessment.
Impact	Without clearly defined adaptive management arrangements it may be difficult to demonstrate that mitigation measures remain effective throughout operation of the scheme. Where monitoring identifies unexpected ecological effects, there may be uncertainty regarding: thresholds for intervention, corrective measures, operational responses, responsibilities for implementation

Solution	Describe: proposed ecological monitoring objectives, key receptors to be monitored, trigger thresholds or performance criteria, actions that will be taken if monitoring identifies adverse trends, adaptive management procedures and governance arrangements, and how monitoring results will be reviewed and reported.
Additional narrative/ explanation Ecological responses to changes in flow and habitat conditions may evolve over operational life-time and may not be fully predictable at the assessment stage. Will be beneficial to explain how monitoring results will be used to review assumptions and implement additional mitigation where necessary.	

2.5. Bio Advice: Limited baseline data sources

Document Reference(s): Chapter 8, Table 8.2	
Issue	Baseline data is limited. In particular only using the data published for classificaiton on CDE, may limit the potential for additional Agency data to be used
Impact	Lack of data to inform assessment of impacts
Solution	It should include Onebenthic (Cefas dataset), Emodnet MAGIC and the Agency open data beynd that simply avaialble currently on CDE. Some of Agency can be obtained from Ecology and Fish Data explorer, DPS open data (and MAGIC).
Additional narrative/ explanation Look for Benthic invertebrate data in ONEbenthic, habitats data for high and lower sensitivity habitats for WFD assessment in MAGIC, Agency open data for saltmarsh and seagrass habitats; estuarine fish and benthic invertebrate and phytoplankton from Ecology and Fish data explorer.	

2.6. Bio Advice: Scoping for EIA and WFD assessment

Document Reference(s): chap 8, Marine biodiversity 8.6.2	
Issue	The applicant should be aware of the difference in scoping approaches required for EIA and WFD assessment. WFD compliance assessment would require higher sensitivity habitats to be scoped in if the footprint of the activity is within 500m of these habitats
Impact	Risk that WFD scoping is inadequate if aligned with EIA scoping.
Solution	Provide clarity to ensure the requirements of WFD scoping are adequately considered. Ensure that the buffers used at this stage in the EIA do not automatically exclude the needs of the WFD compliance assessment - in terms of baseline data collection and the correct scoping for the WFD assessment. See Clearing the Water for All guidance for the requirements of this assessment.

2.7. Bio Advice: Limitations to fish spawning data

Document Reference(s): Chapter 8, Marine biodiversity, 8.4.30

Issue	Cefas areas are a definitive marine spawning reference to use, but some species such as migratory and estuarine species may not be well represented in this data set
Impact	Migratory and estuarine fish e.g. flounder and seabass may not be well represented in the Cefas spawning data [40]
Solution	We recommend using the spawning and nursery ground data provided by Cefas as the baseline and add any IFCA, Cefas , species specific reports and ICES specific data to this. In particular any fish egg data.
Additional narrative/ explanation (if necessary) We see additional datasets have been sought from data collected for other infrastructure projects which is supported.	

2.8. Bio Advice: Limitations in WFD scope for transitional and coastal waters

Document Reference(s): Vol. 2: Appendix 6-2, section 1.2.1, final bullet	
Issue	Not all Biological Quality Elemenets (BQE) for transitional and coastal waters have been included in this statement. It states 'Aquatic habitat survey data will be used to support interpretation of WFD Biological Quality Elements (fish, macroinvertebrates, macrophytes and phytobenthos) and to inform both the Ecological Impact Assessment and WFD compliance assessment.' Phytoplankton, macroalgae and angiosperms are not included..
Impact	Risk that scope of the WFD compliance assessment will not include all BQE.
Solution	Include these missing BQE

2.9. Bio Advice: Consideration of intertidal habitats

Document Reference(s): Chapter 7. Table 7.13 Vol.2: Appendix 6-2, Table 1_1	
Issue	It is not clear where the main focus is for the consideration of intertidal impacts. Table 7.13 states that the Marine biodiversity chapter will include all receptors and sites from MHWS. This overlaps with the other terrestrial chapter which also includes intertidal sites. Appendix 6-2, Table 1-1 separates baseline data collection into "Freshwater" and "Marine" categories, with no clear consideration of transitional waters. No specific methods are described for collection of transitional water baseline data, and estuarine environments are not clearly referenced within the freshwater methodology
Impact	This creates uncertainty as to whether transitional waters and associated WFD receptors have been appropriately scoped into the assessment. Transitional systems require different baseline datasets, assessment methods and receptor considerations from freshwater and coastal systems. There is therefore a risk that relevant biological quality elements and supporting habitat data are overlooked, potentially affecting the robustness of the WFD Compliance Assessment

Solution	The ES must maintain clear cross-references between Chapters 6, 8 and 9 to ensure complete consideration of intertidal habitats. The ES and WFD Compliance Assessment should clearly explain how transitional waters, including the Bure, Waveney, Yare and Lothing water body, have been considered within baseline data collection and receptor identification. Data searches should align with the requirements of the Environment Agency's Clearing the Waters for All guidance and should not rely solely on the Ecology and Fish Data Explorer. Relevant datasets for saltmarsh, seagrass, macroalgae and other WFD biological quality elements should also be obtained from appropriate sources, including EA Open Data and MAGIC where relevant. The methodology should clearly confirm that upper estuarine and transitional environments are included within baseline assessment where hydrological connections exist.
Additional narrative/ explanation We acknowledge the way this is written on the Water Hub makes it seem this is the place for all ecology data , we are working to get this corrected. Our saltmarsh, and macroalgae data are available as open data.	

3. Fisheries

3.1. Fish Advice: Impacts on fish during low flow conditions

Document Reference(s): VOLUME I: MAIN REPORT Chapter 9, Table 9-32 Hydromorphology during construction	
Issue	The potential impacts to fish of in-channel working under low flow conditions should be recognised.
Impact	Exacerbated impact of sediment load and reduced oxygen under low flow conditions could increase potential for physiological stress to fish and likelihood of fish kill events.
Solution	Consider secondary measures to protect fish from construction impacts under low flow conditions such as monitoring for dissolved oxygen and temperature and set safety thresholds for cessation of works.
Additional narrative/ explanation (if necessary):	

3.2. Fish Advice: Fisheries monitoring programme

Document Reference(s): VOLUME II: APPENDICES. BIODIVERSITY DATA COLLECTION STRATEGY, p.13/14 Freshwater Aquatic species	
Issue	It is indicated that the fisheries surveys are to be "accepted by the Environment Agency prior to commencement 2026/2026 and if required, will be undertaken between July and September. " The NAU technical team have not yet received detail of the monitoring programme.

Impact	The potential impacts affecting all species may not be fully considered. Potential shortcomings in timing and delivery of surveys to meet EIA needs.
Solution	Extend the range of data used to inform the fish community makeup including use of angler catch data, complimentary EA data and targeted surveys e.g. eDNA sampling. We note from the updated Biodiversity strategy sent 06/08/2026 that fish surveys are intended by the applicant and welcome further dialogue on the planned programme for these
Additional narrative/ explanation (if necessary):	

3.3. Fish Advice: Attractant flows from discharges

Document Reference(s): Appendix 7.1, paragraph 1.5.1, Fish	
Issue	Potential impacts from discharge velocity has not been described
Impact	Risk of potential impacts from discharges causing attraction flows
Solution	Set discharge velocities from discharges no greater than half that of the receiving water
Additional narrative/ explanation (if necessary): Guidance should also include the IFM Fish Pass Manual which is available here https://ifm.org.uk/wp-content/uploads/2020/09/Fish-Pass-Manual.-GoodVersion-pdf.pdf This is in relation to competing flows from the outfall discharge. The velocity from the discharge when compared to the ambient river velocity, should not be the main attractant velocity for fish. This could lead to shoaling of fish and lead to increased predatory exposure, unfavourable WQ and increased water temperatures.	

3.4. Fish Advice: Effects on fish communities

Document Reference(s): VOLUME I: MAIN REPORT Chapter 7, section 7.9 Table 7-13 p 177	
Issue	The description of the potential effects are correct but are too vague to capture the specific concerns that we have engaged with the applicant over.
Impact	Potential for monitoring and risk assessment to not include all relevant parameters.
Solution	Include detail on all aspects of monitoring that could impact resident and migratory fish including olfactory signatures, olfactory disrupting chemicals, thermal discharge and velocity influences from the discharges.
Additional narrative/ explanation: Further detailed advice has been provided from the EA by email "Water Quality monitoring requirements for consents RE: Lowestoft reuse data " sent 04/02/2026.	

4. Hydromorphology

4.1. General considerations for watercourse crossings and landfall

The following are general guiding principles to consider when designing watercourse crossings / coastal landfall to avoid negatively affecting geomorphology and natural processes:

• Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as Horizontal Directional Drilling (HDD) to minimise the likelihood of cables entering the water environment.

• Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.

• Ensure coastal landfall infrastructure is located outside of areas expected to be impacted by coastal change over the duration of the project.

• Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.

• Consider opportunities to deliver Water Framework Directive (WFD) mitigation measures/ Biodiversity Net Gain (BNG) uplift as part of the design.

• Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.

ii. Small watercourses and WFD - watercourses with a catchment less than 10km/2 connected to a downstream WFD waterbody take the classification of that waterbody.

iii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.
[BNG guidance is mentioned here because our usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of banktop to be encroaching on the watercourse.]

• Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to our satisfaction.

• Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
• Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook (Flood Estimation Handbook (FEH) | UK Centre for Ecology & Hydrology (ceh.ac.uk). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
• If river crossings (bridges, culverts, and buried cables) are required as part of the development, we would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.
Further guidance in regard to river crossings can be found in the following document: SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

4.2. Watercourse sensitivity

• Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
• WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

5. Water Resources

5.1. WR Advice: Water supply

The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification (https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). Developments have the potential to increase demand for water and

result in increased abstraction from groundwater sources. All growth from new developments must be able to be supplied with water from sustainable abstractions and water companies may need to put new strategic plans in place to accommodate further growth.

Both Anglian Water Services (AWS) and Essex Suffolk Water (ESW), who supply regions of this development, are subject to licence reductions (caps) on its groundwater licences to manage the risk of deterioration of the associated water bodies, according to the principles set out in the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WFD Regulations). The company's 2024 water resources management plan (WRMP24) has set out that it will be reliant on seeking to defer some licence reductions until new strategic supplies such as this development can be developed.

The development lies within Water Resource Zones (WRZs), within which Regulation 19 applications have been received to defer licence changes and risk deterioration. We recommend that the utilities statements explicitly consider the difference between ability to physically supply and whether that supply can be made using sustainable sources of water. ESW's and AWS's WRMP sets out that the company may not be able to supply all new non-domestic demands until new supplies are developed.

5.2. WR Advice: Abstraction licencing

Document Reference(s): General	
Issue	If dewatering is required, it will require an abstraction licence if it doesn't meet the criteria for exemption in *The Water Abstraction and Impounding (Exemptions) Regulations 2017 Section 5: Small scale dewatering in the course of building or engineering works*. It may also require a discharge permit if it falls outside of the *regulatory position statement for de-watering discharges*.
Impact	Consumptive abstraction from Groundwater is generally not available from the aquifers in this region, more details can be found in the Abstraction Licensing Strategy for the catchment.
Solution	Table 9-33: Potential Tertiary (Inexorable) Mitigation Measures states that if impacts occur from abstracting groundwater, then abstracted water is to recharge to groundwater. If the dewatering activity can be demonstrated to be discharged to the same source of supply without intervening use (i.e. non-consumptive), this will increase the likelihood of a licence being granted.

6. Groundwater and Contaminated Land

6.1. GWCL Advice: Disturbance of peat

Document Reference(s): Chapter 20	
Issue	The project will disturb peat
Impact	Pollutant release to controlled waters, loss of soils, subsidence as well as carbon emissions.
Solution	Appropriate management plans should be utilised to manage and mitigate risks
Additional narrative/ explanation We recommend that the soil management plan should contain specific provisions for the identification, handling, protection, storage, and reinstatement of peat soils if its disturbance cannot be avoided through project design. If peat excavation is likely to become a significant part of the project, we recommend that a standalone peat management plan be considered. We welcome the applicants approach to identifying peaty soils at the screening stage. The England Peat Map is known to be less accurate in lowland areas [NERR149 England Peat Map Final Report] so the inclusion of the NATMAP national soil map in the screening to inform site soil surveying is a robust approach.	

6.2. GWCL Advice - Permitting requirements

Document Reference(s): Chapter 2, 2.3.8, Chapter 9, Chapter 19	
Issue	Some aspects of the development may require permits or licences during all construction, operational and decommissioning phases.
Impact	Detailed design may be affected by permit requirements
Solution	Engage with National permitting Service at the Environment Agency at the earliest opportunity to identify potential constraints
Additional narrative/ explanation Dewatering activities, water discharges and waste activities may require permits or licences that may affect the detailed design of the project. This development will require a permit under the Environmental Permitting (England and Wales) Regulations 2016. We do not have enough information to know if the proposed development can meet our requirements to prevent, minimise and/or control pollution.	

To reduce the risks to people and the environment and obtain a permit:

- the suitability of the location with respect to the protection of groundwater will need to be considered.
- the design and/or layout of the buildings may need to change.
- the design may need to include abatement technology to reduce the impact of the development beyond Best Available Techniques (BAT). In particular, mitigation is likely to be required to control the risks of discharge to the environment.

We will not be able to determine a permit application until this information has been provided.

We recommend that the developer considers parallel tracking the planning and permit applications as this can help identify and resolve any issues at the earliest opportunity. We would welcome a joint discussion with the applicant and the LPA to discuss this further.

6.3. GWCL Advice : Maximum depths of infrastructure

Document Reference(s): Chapter 2, 2.4.13	
Issue	Maximum depths have not yet been established for several features except for trenches
Impact	Maximum impacts into the geological and hydrogeological regimes cannot be established
Solution	Supply maximum expected depths for all features.
Additional narrative/ explanation We recognise that detailed design information will not be present at this stage of the project. However to be able to determine the extent of possible impacts we recommend the applicant supplies maximum reasonably expected depths for all features interacting with the sub surface.	

6.4. GWCL Advice: Use of best available guidance

Document Reference(s): Chapter 19, 19.8.2	
Issue	Important guidance has not been noted.
Impact	Compliance with best available practice may not be used increasing risk.

Solution	Refer to and follow all relevant guidance and legislation in further assessments and plans.

Additional narrative/ explanation

The report either does not include or does not consistently include:

- A new perspective on Land and Soil in Environmental Impact Assessment, IEMA, February 2022
- Environment Agency's Approach to Groundwater Protection, February 2018.
- CIRIA C532 Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors (2001)
- EA Pollution Prevention Guidelines (esp. PPG1, PPG5, PPG6, PPG21)

6.5. GWCL Advice: Management of fuel storage and electrical infrastructure

Document Reference(s): Chapter 2, 2.4.7	
Issue	The development includes fuel storage, generators and electrical infrastructure.
Impact	The development may increase risks of pollution to controlled waters if not adequately mitigated.
Solution	Details of mitigations should be included in surface water management plans, oOEMP and fire risk management plans as well as being assessed in the ES.

Additional narrative/ explanation

Due to the presence of generators, related fuel infrastructure, and electrical infrastructure that carry higher potential for contamination, information should be supplied such on hard standing and bunding should be supplied along with appropriate mitigations and control measures, including whether or not hard standing will be utilised. This is to insure risk to controlled waters in minimised. This is in line with the Environment Agencies published groundwater position statements section D, The Environment Agency's approach to groundwater protection.

6.6. GWCL Advice: decommissioing of sub-surface infrastructure

Document Reference(s): Chapter 2, 2.6.2	
Issue	The applicant proposes to leave sub surface infrastructure in-situ at decommissioning

Impact	Infrastructure left in situ can become a source of contamination as it degrades, and act as preferential pathway, that allows the rapid migration of contamination. These can result in impacts to groundwater quality.
Solution	If removal is not adopted at the decommissioning phase, the Applicant should demonstrate that infrastructure left in-situ indefinitely would not pose a potentially significant source of contamination to controlled waters. The Decommissioning Strategy should specify how cables and pipelines retained in-situ would be cut and sealed. Underground cabling should have a design lifespan at least commensurate with the operational phase of the Proposed Development.

Additional narrative/ explanation

The applicant has proposed that some or all infrastructure may be left in situ indefinitely at decommissioning. We do not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that cables and pipelines are removed entirely at the end of the project's functional lifespan. Further, we ask the applicant to consider the potential effects of infrastructure being left in situ, such as deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater.

The applicant should refer to regulatory guidance and general best practice at the time of decommissioning. Whilst the current intention may be for these to be left in the ground, we strongly recommend that the applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it be later deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved.

It is important to consider that use of plastic ducting to facilitate easy removal of cables may have its own impacts. This ducting could degrade over time in a similar manner to plastic cable housing, with some residual risk to sensitive receptors.

If infrastructure is retained within ploughing depth these may damage agricultural equipment and release contaminants into the soil. If cables are proposed to be retained these should be cut and sealed in a manner to minimise the rate of degradation and potential contaminant release.

6.7. GWCL Advice: Management of HDD

Document Reference(s): Chapter 2, 2.4.8	
Issue	The applicant is proposing to utilise HDD drilling.
Impact	HDD drilling has an associated risk with hydraulic fluid break outs during operation, this could impact groundwater quality.
Solution	The applicant should produce a hydraulic fluid breakout plan (also called a frac-out plan) that identifies risks to receptors and how they will be mitigated along with monitoring and controlled methods to be utilised.
Additional narrative/ explanation In addition to a hydraulic fluid break out plan, the applicant should consider at an early stage what additives are to be utilised. These may require a permit or groundwater exclusion, due to their potential to cause pollution, which could impact on project timelines and will require consultation with the Environment Agency. Any lubricants or slurries utilised during these methods should also avoid the use of PFAS group chemicals.	

6.8. GWCL Advice: Licenced abstractors

Document Reference(s): Chapter 9, 9.4.391	
Issue	The applicant may have missed some licenced abstractors
Impact	Impacts to a groundwater receptor may be missed resulting in deterioration due to inadequate mitigations being imposed.
Solution	Applicant should contact EA and Local Authority to ensure all groundwater abstractors have been noted.

6.9. GWCL Advice: Source protection zones

Document Reference(s): Chapter 9, Table 9-31	
Issue	The table has not referenced Source Protection Zones 1 as a key receptor to be avoided.
Impact	Risk that impacts to the key receptor would be missed resulting in impacts to a controlled water receptor

Solution	Avoid works in SPZ1 or introduce sufficient mitigation measures to prevent deterioration of groundwater quality. Recognise some area's may not be suitable for direct SUDs usage without the use of penstocks in the event of a pollution incident. These should be detailed within surface water management plans.
Additional narrative/ explanation Any Surface water management plan, and risk assessment utilised in such, should reference CIRIA SUDs Manual C753 and National standards for sustainable drainage systems (SuDS) - GOV.UK**.** Note should also be taken of position statements G1 and G9-13 of The Environment Agency's approach to groundwater protection as to what is likely to be considered acceptable by the Environment Agency, if discharge to ground is being utilised.	

6.10. GWCL Advice: Impact of sub-surface infrastructure

Document Reference(s): Chapter 9, Table 9-30	
Issue	Permanent sub surface infrastructure could block, disrupt or increase groundwater flow or act as a rapid pathway for contaminants.
Impact	Increased level of impacts of any pollution incidents and impacts on groundwater flow.
Solution	Ensure inclusion as both as a receptor and pathway in assessing impacts
Additional narrative/ explanation Preferential pathways can allow for the rapid and less predictable spread of any pollutants that reach them. This can lead to higher risk of receptors at greater distances being affected, or of pollutants reaching receptors faster than would be expected. As such we believe all preferential pathways identified should be included in any assessments of risk and hazard. Design phase should assess methods such as Clay Stanks, other barriers, or methods to limit the migration of potential contaminants.	

Informative	Lifespan of Infrastructure The Applicant should ensure that all below ground infrastructure is suitable for the operational lifespan of the project to minimise the risk of further preventable disturbance during this period.

Informative	Waste on site

	A soil management plan should be in place before any works commence, to ensure that clean and suitable soils are not unnecessarily classified as waste. Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. The Environment Agency recommends that developers should refer to: • CL:AIRE Definition of Waste: Code of Practice • EA Regulatory Position Statement 215: Treating small volumes of contaminated soil and groundwater

Informative	Waste to be taken off site Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes: • Duty of Care Regulations 1991 • Hazardous Waste (England and Wales) Regulations 2005 • Environmental Permitting (England and Wales) Regulations 2010 • The Waste (England and Wales) Regulations 2011 Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

	If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to our website for more information.

Informative	Sustainable drainage systems The Government's expectation is that sustainable drainage systems (SuDS) will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation. Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should: • be suitably designed • meet Governments non-statutory technical standards for sustainable drainage systems – these standards should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance • use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply, they should also remain shallower than 2m with a minimum of 1.2m of unsaturated zone. See the Environment Agency's approach to groundwater protection, position statement G13: Groundwater protection position statements.

Informative	Land contamination assessment We expect land contamination assessments to follow the tiered approach laid out in our Land Contamination Risk Management (LCRM) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial conceptual site model (CSM) describing possible pollutant linkages for controlled waters, and identification of potentially

	unacceptable risks. Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with BS 5930: Code of practice for ground investigations and BS 10175: Investigation of potentially contaminated sites – code of practice. Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground. CL:AIRE has guidance on what historic usages are more likely to cause what pollutive impacts, this is available at Industry Profiles.

Informative	PFAS The applicant should where possible avoid the use of PFAS-containing products in buried cabling, conduits and other subsurface infrastructure. The applicant should ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.

7. Water Quality

7.1. WQ Advice: WFD Data

The WFD data presented in this report include the 2029 and 2022 results and classifications. The Applicant should be aware that the next comprehensive update of classifications in all water bodies, as required in the WFD Regulations, is the 2025 classifications. Draft 2025 classification results have been finalised and can now be shared externally with stakeholders on demand via FOI request. A draft WFD assessment is submitted at each Gateway, and these should include the most recently available data.

7.2. WQ Advice: Maintenance of SUDS

Table 9-37 includes the use of SUDS as a likely mitigation measure during all phases of development. The Surface water management strategy must be suitably designed to manage the risks from sediment, hydrocarbons, and other hazardous substances which could impact water quality. The Applicant must commit to producing a SuDS maintenance schedule, based on the CIRIA SuDS Manual, which should be applied to SuDS for all development phases.

7.3. WQ Advice: Emergency Response Plan

An Emergency Response Plan (ERP) should be developed in consultation with the relevant local planning authority, wmergency services and the Environment Agency in relation to responding to flood and pollution events. The EPRP should identify the importance of notifying any downstream river/groundwater abstractors in the event a pollution incident should impacts to surface water and/or groundwater occur.

7.4. WQ Advice: Sensitivity of water environment receptors criteria

Waterbodies not classified under WFD are ranked as 'Medium' sensitivity. There are water quality concerns to downstream receptors if sensitivity methodology is not correct. Impacts in smaller streams are still a non-compliance to WFD and protection should be secured. The applicant should increase sensitivities of surface watercourses that are tributaries into WFD designated watercourses.

7.5. WQ Advice: WQ Monitoring Plan

Document Reference(s): MAIN DOCUMENT 3.3.20 / Table 9-32 / Table 9-37	
Issue	There is no mention of the need for a monitoring plan for prior to, during or post construction. Section 3.3.20 only states "Environmental surveys and monitoring". Table 9-32 includes Regular water quality monitoring" for the operational phase, but not for the construction phase.
Impact	If a monitoring plan is not suitably designed then it may not be able to detect relevant trends, if any, on water quality across all phases of the development.
Solution	Secure a commitment to a WQ monitoring plan with outline plan submitted with the environment management plans. Further details of frequency, quantity, location and method of monitoring must be agreed with the EA post-consent.
Additional narrative/ explanation The locations should include monitoring upstream and downstream of any proposed surface water outfalls and water crossings. Methods should include visual observations, in-situ hand held devices, and samples sent off to the UKAS accredited laboratories.	

7.6. WQ Advice: Secondary mitigation for protection of the water environment

Document Reference(s): MAIN DOCUMENT 2.4.6 2.4.7 / 2.4.21 / 2.5.7 / Table 9-32, 9-37	
Issue	Table 9-32 lists potential secondary mitigation measures and includes implementation of an OCEMP and ODEMP. The scope for this document must be agreed with the Environment Agency prior to submission of the ES. Risks from hazardous substances, concrete, and from HDD have not been considered.
Impact	There is a risk of inadequate mitigation against impacts to water quality from during construction and operation.
Solution	Agree the scope of the environment management plans with the Environment Agency prior to submission of the ES. The CEMP should

	include mitigation measures against potential impacts from spills of hazardous substances; mitigation measures for use of concrete, and a bentonite break-out management plan.

7.7. WQ Advice: Sediment management at temporary commissioning lagoons

Document Reference(s): MAIN DOCUMENT 2.5.17	
Issue	It is unclear what sediment management is proposed at the temporary commissioning lagoons. Lagoons should provide settlement of sediment but any further treatment or sediment management is unknown.
Impact	Water quality could be at risk from suspended solids and other contaminants in surface runoff
Solution	Applicant should include in the CEMP suitable sediment management methods, and be clear that they understand a permit may be required is lagoon water is of a compromised quality
Additional narrative/ explanation: A water discharge activity permit may be required	

8. Permitting

The Applicant should consider the timing of non-planning permit, licence, and consent applications for both operational and construction activities to avoid delay to their project. Planning and Permitting are closely linked when assessing the viability of a project but the Permitting process is distinct from Planning. Further information on the interface between Planning and Permitting can be found here: Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process - Annex D: Environment Agency - GOV.UK.
Permit and licence applications relating to Strategic Resource Options are automatically incorporated into the Environment Agency's Permitting Priority Tracked Service, with a coordinator assigned to oversee all Permitting matters. The applicant should commence Permitting pre-application discussions well in advance of the DCO submission, identifying what permits and licences are fundamental to the operation of the site and therefore most closely linked to Planning considerations. The applicant should also consider what permits and licences are required to support construction, and which, if any, can be wrapped up into the DCO.

Essex County Council

County Planning
County Hall
Chelmsford
Essex
CM1 1QH

Environmental Services
Infrastructure Decisions and
Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough, SL1 4PN
SuffolkWRTS@planninginspectorate.gov

Ref: WA0210003
Date: 15 September 2026

Dear Sir/Madam

re: WA0210003

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)

Thank you for identifying Essex County Council as a consultation body. We have reviewed the EIA Scoping Report Volumes 1 – 3, dated August 2026 and confirm that we **do not have any comments** at this time.

We would be grateful if you continue to keep us informed of the progress of this project.

Yours faithfully,

[redacted], **NSIP Manager**

E: [redacted]@essex.gov.uk / [redacted]@essex.gov.uk

W: www.essex.gov.uk

EYE TOWN COUNCIL

Eye Town Council (ETC) is pleased that the Essex and Suffolk Water (ESW) project is being developed. We are a water scarce area and have water heavy use farming and other industries in the Hartismere Water Resource Zone (HWRZ). We are happy that ESW is working to resolve the serious water shortage issues in HWRZ. According to ESW, the Western Service Reservoir will act as an end storage point of the water supply network before the water goes into the distribution network of HWRZ. Eye is a designated growth area and this reservoir will hopefully support future housing development as well as Eye Airfield Industrial Park.

ETC has some concerns.

- In order to fully understand these plans and the implications for Eye, we request ESW produce maps that show the proposals in detail as local reference points are not clearly visible.

- The proposed pipeline 7 runs through an already sensitive environmental and residential cluster area on and just off of Brome Avenue. The area is due to be developed as a major section of a solar farm. Brome Avenue is a private track and footpath and is unsuitable for any heavy goods vehicles. It is lined with an avenue of 90-year-old oaks with extensive roots. There are also many old trees and two households in the indicative path. It is recommended that ESW meet with ETC members and Brome Ave residents to discuss concerns particularly as they will be under another intensive construction project at that time. We understand EcoPower and ESW are in communication. However, direct communication is imperative with these already stressed and overburdened residents.

- ETC also has concerns on construction traffic management of other parts of pipeline 7. Currently, Eye has approximately 11,000 vehicle movements per weekday through the Magdalen St junction where the B1077 and B1117 meet. There are natural pinch points on these roads of 4.4 m to 4.9m. HGVs meeting head on traffic often have to reverse around corners and vehicles regularly mount the pavements. There have been many building, wall and vehicle strikes even on the wider parts of these roads due to the lack of sight lines and congestion. Construction traffic for pipeline 7 to the east of Eye will only add to this as traffic continues to naturally increase and EcoPower Suffolk starts its solar farm construction to the south. There is a primary school on this route, and it is a residential area with narrow or no pavements. ETC urges ESW to devise a traffic management plan which ensures very little traffic for construction to the east of Eye comes through Eye. Resident and visitor safety is already severely impaired.

- Site 9 is very visible from the road and next to homes. ETC expects proper landscaping to screen the reservoir and expects ESW works with Public Rights of Way to provide a path to cross the zone.

ETC is aware that Cranswick Foods has permission to expand by 50%. In a water scarce area and with more dry seasons in the future, ETC is extremely concerned about the amount of water that may be required by existing and future industry (e.g., data centres) as well as growing domestic use. The current use of clean water at Cranswick alone is 0.95 million litres per day and will rise to over 2 million per day on full expansion. This does not take into account the hatchling factories being built and the rapid expansion of existing chicken farms in the HWRZ; all extremely water intensive.

We would ask the inspectorate to investigate the following:

1. What is the predicted residual water-resource headroom in the HWRZ in 2032, after accounting for existing demand, new housing, Cranswick expansion and other committed/foreseeable non-domestic development such as data centres. The current headroom is just 270,000 litres per day.

2. Has the capacity assessment been tested against predicted climate-change scenarios involving reduced summer rainfall, increased temperatures and prolonged drought, rather than relying primarily upon historic climate conditions. The River Waveney must be protected from overuse in times of drought.

This project is necessary and welcome but must be done in a way that ensures, but also balances, the future of HWRZ water availability.

Rishabh Rai

From: [redacted]@forestrycommission.gov.uk>
Sent: 30 September 2026 15:16
To: Suffolk WRTS
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Follow Up Flag: Follow up
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Thank you for consulting the Forestry Commission on this proposal.

As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland.

The project area contains several areas of Ancient Woodland including Infilled Ancient Wood Pasture either directly adjacent to the area of in close proximity to it.

The report states that ancient woodland, or ancient and veteran trees at distances greater than 15m from the order limits will be scoped out of the assessment in the Environmental Statement.

Ancient Woodland and Ancient & Veteran Trees:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed.

We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England.

The Standing Advice states that proposals should have a buffer zone of **at least** 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland.

A 15m buffer is a **minimum** starting point designed for tree root impacts. There are other impacts that need to be considered before direct and indirect effects of irreplaceable habitat, and deterioration of condition can be considered avoided.

The Joint NE/FC Standing Advice also states that both the direct and indirect effects of development should be considered for both the construction and operational phases of any proposed development. Not just including the potential for actual construction to impact on soils, trees and tree roots. But also the potential for effects when any development is in use and operational.

If ancient woodlands or ancient and veteran trees at a greater distance than 15m are scoped out, any direct or indirect impacts may not be fully assessed and therefore loss or deterioration could occur.

Other impacts to ancient woodlands, can include but are not limited to:

- reducing the resilience of the woodland and making it more vulnerable to change.
- increasing the amount of dust, light, air, soil and water pollution.
- increasing disturbance to wildlife.
- trampling of plants, erosion of soil or compaction of soil.
- changing the water table or drainage.
- damaging functional habitat connections, such as open habitats between trees in wood pasture and parkland.
- noise pollution and disturbance from additional people and traffic.

We note that the potential for waste water pollution in particular has been highlighted in the report.

Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage.

We would expect to see a detailed assessment of any impacts to the ancient woodlands, including details of measures to be taken to reduce and mitigate any effect.

It is essential that fuels, chemicals or water materials such as topsoil, minerals or hardcore are not stored on Ancient woodland soils or under the woodland canopy.

Mixed deciduous woodland – Priority Habitat:

Mixed Deciduous woodlands are on the National Forest Inventory and the Priority Habitat Inventory (England).

They were recognized under the UK Biodiversity Action Plan as being the most threatened, requiring conservation action. The UK Biodiversity Action Plan has now been superseded but this priority status remains under the Natural Environment & Rural Communities Act 2006. (NERC) Sect 40 "Duty to conserve and enhance biodiversity" and Sect 41 – "List of habitats and species of principle importance in England".

Fragmentation is one of the greatest threats to mixed deciduous woodland. Woodlands can suffer loss or deterioration from nearby development through loss of connectivity, damage to soils, roots and vegetation and changes to drainage and air pollution from an increase in traffic or dust, particularly during the construction phase of a development. Loss of habitat connectivity is a particular concern.

For any woodland within the development boundary, land required for temporary use or land where rights are required for the diversion of utilities, the Root Protection Zone must be taken into consideration. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy.

Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals) and fencing off these areas to prevent unintended incursions into the root protection zone as well as dust prevention measures to reduce any potential impact of dust pollution.

Net Deforestation and Tree Planting:

It is expected that there will be thorough assessment of all trees within the project boundary to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.

A scheme that bisects any woodland, will not only result in a significant loss of woodland cover, but will also reduce the ecological value and natural heritage impacts due to habitat fragmentation which will have a negative impact on it's ability to respond to the impacts of climate change.

Hedgerows, individual trees and woodlands within a development site should also be considered in terms of their overall connectivity between woodlands affected by the development.

Where woodland loss is unavoidable, we would expect to see significant compensation and the use of buffer zones to enhance the resilience of neighbouring woodlands. These zones should include further tree planting or a mosaic of semi-natural habitats. Perhaps with the creation of some larger woodland blocks and hedgerow/hedgerow trees between existing woodland blocks, to link them and ensure maximum gains to increase habitat connectivity, making woodlands more resilient and to benefit biodiversity across the whole site.

With the Government aspiration to increase tree and canopy cover to 16.5% of land area in England by 2050, The Forestry Commission is seeking to ensure that tree planting is a consideration in every development not just as compensation for loss. However, there are a number of issues that need to be considered when proposing significant planting schemes:

The species and provenance of new trees and woodland needs to be considered to ensure a resilient treescape which can cope with the full implications of a changing climate. The biosecurity of all planting stock also needs to be considered to avoid the introduction of pests and diseases, particularly in areas near ancient woodlands.

Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience.

The Climate Matching Tool - Forest Research also provides a visualisation of regions with a similar climate to the climate projection for any location in Europe. It gives an indication of the climate that trees are likely to experience in the future. This can help practitioners to consider the selection of better suited material from environments that England may experience in the future.

Plans should also be in place to ensure the long term management and maintenance of new and existing woodland.

Avoiding impacts and good landscape design

To meet planning policy and Government guidance, we advise that the EIA scoping and future environmental assessments for this project should include the following:

- Robust adherence to the Standing Advice to rule out loss and deterioration of ancient woodland, ancient trees and veteran trees as far as possible. For example, this may include the need for a larger buffer area than the 15m buffer. The Assessment Guide in the Standing Advice can help the applicant to establish what further assessments may be needed as part of the EIA process to avoid unexpected problems later on in the design process.

- A thorough assessment of all trees within the project boundary to identify any ancient or veteran trees in line with good arboricultural practice (BS 5837), to assess any net loss of trees and the development of mitigation measures to minimise any risk of net deforestation because of the scheme.
- Hedgerows, individual trees and woodlands within a development site should be considered in terms of their overall connectivity between woodlands affected by the development.
- Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges.
- Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area.
- Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050.

We hope these comments have been useful to you. If you require any further information, particularly on buffer zones for ancient woodland or veteran trees, or tree planting and habitat connectivity, please don't hesitate to contact me.

Best wishes

Sandra

[redacted]

Local Partnership Advisor
East & East Midlands

Tel: [redacted]
[redacted]@forestrycommission.gov.uk



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Disclaimer

Rishabh Rai

From: Deputy Town Clerk <dtc@framlingham.com>
Sent: 18 September 2026 09:02
To: Suffolk WRTS
Subject: FW: Scoping Document

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Categories: EST

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Framlingham Town Council does not wish to have anything added to the scoping document thanks.

[redacted] BA Hons, ILCA)
Deputy Town Clerk

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Rishabh Rai

From: FPL - Conx Request <ConnectionRequest@fulcrum.co.uk>
Sent: 10 September 2026 15:22
To: Suffolk WRTS
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Good Afternoon

We can confirm Fulcrum Pipelines Limited do not have any existing pipes or equipment on or around the above site address.

Please note that other gas transporters may have plant in the area which could be affected by your proposed works.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455.

In case of an emergency please phone 0800 111 999.

Kind regards,

FULCRUM

FPL - Conx Request
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From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 09 September 2026 11:14
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Dear Sir/Madam,

Re: Suffolk Water Recycling, Transfer and Storage Project (WA0210003) - Environmental Impact Assessment Scoping Consultation Response

Thank you for consulting Great Yarmouth Borough Council on the Environmental Impact Assessment (EIA) Scoping Report for the proposed Suffolk Water Recycling, Transfer and Storage Project.

The Council has reviewed the Scoping Report and provides the following comments for consideration in preparing the Environmental Statement (ES).

The Council's Environmental Health officers have reviewed the Scoping Report and are satisfied that the proposed scope of assessment adequately addresses matters relating to noise and vibration, air quality, odour, and contaminated land. No further comments are offered on these topics at this stage.

Notwithstanding the above, the Council considers that the assessment of odour impacts should include consideration of any potential off-site effects associated with the handling, storage and transportation of sludge and other residual waste streams generated by the proposed development. Any Odour Management Plan should demonstrate how both on-site and off-site odour impacts would be managed and mitigated, having regard to nearby residential, tourism and other sensitive receptors.

Planning Policy Context

The Council notes that Table 1-3 of the Scoping Report identifies the Great Yarmouth Core Strategy (2015) and Local Plan Part 2 (2021) as the relevant development plan documents for Great Yarmouth Borough.

Both of these plans have now been superseded by the Great Yarmouth Local Plan (2024-2042), which was adopted by Full Council on 24 September 2026. The policies contained within the adopted Local Plan now partly comprise the statutory development plan for the Borough and should be used as the principal planning policy framework for the EIA and Environmental Statement.

Paragraph 1.13.2 of the Scoping Report notes that ongoing developments in planning policy will be monitored and considered as appropriate. The Council therefore expects the adopted Great Yarmouth Local Plan (2024-2042) to be reflected in the final Environmental Statement and any supporting assessments.

Existing and Planned Development

The Environmental Statement should take account of existing, committed and planned development within the vicinity of the proposed scheme, particularly where such development may act as a sensitive receptor to environmental effects arising from the project during construction and

operation, including nuisance and disturbance impacts on nearby sensitive receptors, subject to a decision on site location.

Consideration should be given to the following allocations within Hopton-on-Sea:

- Policy HOP1 - Land at Longfulans Lane, Hopton-on-Sea, allocated for approximately 50 sheltered housing units.
- Policy HOP2 - Land at Coast Road, Hopton-on-Sea, allocated for approximately 40 dwellings and 26 sheltered housing units.

The Council considers that these allocations should be incorporated into the future baseline and cumulative effects assessments where relevant.

The Environmental Statement should also consider existing and proposed tourism-related development in and around Hopton-on-Sea, including Potters Resorts and Hopton Holiday Village, both of which accommodate significant numbers of visitors and may represent sensitive receptors to both the Advanced Water Recycling Plant and Long Sea Outfall.

In addition, consideration should be given to approved planning permission 06/23/0378/F at Potters Resort for the installation of 51 additional holiday accommodation units, together with associated infrastructure works. The Council considers that this development should be reflected within the assessment baseline where appropriate.

Essex and Suffolk Water has previously been provided with information relating to local planning permissions and allocated sites, and these should be taken into account in siting decisions and within the Environmental Statement.

Landscape and Visual Impacts

The Council notes that potential site options for the proposed Advanced Water Recycling Plant are situated within, or may affect the setting of, the H1 Blundeston Tributary Valley Farmland landscape character area as identified in the Great Yarmouth Borough Landscape Character Assessment (2008).

The Environmental Statement should demonstrate how the siting, scale, height, massing, lighting and operational infrastructure associated with the proposed development has responded to the landscape sensitivities of the area. Particular regard should be given to the importance of wooded skylines, tributary valley landform, existing field boundary vegetation, rural landscape character and the open areas between settlements.

The assessment should consider potential visual effects from nearby settlements, public rights of way, tourism destinations and transport corridors. Particular regard should be had to views from and across the countryside between Hopton-on-Sea and Corton and the contribution of this area to the visual separation between settlements.

The Environmental Statement should identify any mitigation measures necessary to avoid or reduce adverse landscape and visual effects and demonstrate how the proposed development would be integrated into its landscape setting.

Historic Environment

Chapters 11 and 12 of the EIA scoping report outlines the applicant's proposed methodology for assessing the impact of the project on the significance of both designated and non-designated heritage assets, including both built and archaeological assets. This is split between the Terrestrial Historic Environment (Chapter 11) and Marine Historic Environment (Chapter 12). Comments on the methodology regarding the assessment of historic landscapes, archaeological assets and areas of archaeological potential should be sought from Norfolk County Council's historic environment service.

Section 11.4 outlines the Study Area for the applicant's ES document. The applicant suggests a Study Area for the assessment of built heritage assets which would range between 250-500m for linear sites and 1km for non-linear sites from the EIA Scoping Area. The Advanced Water Recycling Plant within the Great Yarmouth Borough is considered a non-linear development site, therefore a 1km Study Area has been used for any direct impacts. Indirect impacts will be scoped in with the same 1km boundary, however this is subject to the findings of the forthcoming Zones of Theoretical Influence (see paragraph 11.2.4) which will be used to inform the scoping of heritage assets, with only those identified as likely to experience a significant impact taken forward. A particular emphasis is placed on the potential for intervisibility between the project and heritage assets; however this Study Area is caveated in paragraph 11.2.6 which indicates that study areas will be reviewed as amended where necessary.

The scoping document highlights that the applicant will engage with the local authority and Historic England to discuss the potential effects of the development. A list of the sources they will use to inform their assessment has been provided at 11.4.3, within which there is no direct reference to local lists of non-designated heritage assets held by the local authorities, and I recommend that this is added to the list of sources. Note that Great Yarmouth Borough Council does not currently hold a local list, but non-designated heritage assets are identified within neighbourhood plans within the borough (none of which affect the AWRP or LSO proposals).

Paragraphs 11.4.6 – 11.4.15 are the most relevant to Great Yarmouth Borough Council, as these relate to the proposed Advanced Water Recycling Plant. Five listed buildings are identified as within the 1km Study Area for the EIA, four of which are within the Great Yarmouth Borough. These are:

- Hopton Hall (Grade II, NHLE: 1050971)
- Whitehouse Farm (Grade II, NHLE: 1152277)
- Church of St Margaret (Grade II, NHLE: 1050971)
- Old St Margarets Church (Grade II*, NHLE: 1050970)

The Borough Council's Conservation service agree that these assets should be scoped into the ES, and it is expected that any assessment should include a summary of their special interest, a description of their setting and the contribution it makes to their significance, as well as the contribution the proposed development area makes to this setting, if any. This should be in line with relevant best practice guidance, namely:

- Historic Environment Good Practice Advice in Planning 2 - Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic Environment Good Practice Advice in Planning 3 - The Setting of Heritage Assets (2nd Edition, 2017)
- Historic England Advice Note 12: Statements of Heritage Significance (2019).

Whitehouse Farm, The Church of St Margaret and Old Church of St Margaret are also scoped into the assessment of the Proposed Long Sea Outfall, outlined within paragraphs 11.4.20 and 11.4.21. The Borough Council's conservation officer agrees with the exclusion of Hopton Hall which will be located at some distance from the development.

As the other areas of the proposal are not within the Great Yarmouth borough, no comment is made on the assets identified in relation to the Proposed CSR, WSR, AWRP to River Waveney Pipeline, Proposed Barsham WTW to CSR Pipeline, Proposed CSR Pipeline to WSR Pipeline, Proposed CSR to Saxmundham Pipeline, Proposed Saxmundham to Sizewell C ('SZC') Pipeline, Proposed Eastern Distribution Mains and Proposed Western Distribution Mains, all of which are described in Chapter 11.4.

Throughout 11.4 it is stated that the applicant anticipates that there will be non-designated built heritage assets within the Study Area that will be identified in the desk-based assessment. Clarification on the criteria for the method of identification and attribution of value should be agreed with the local authority prior to this assessment being conducted where relevant.

Section 11.5 outlines the applicant's initial assessment of likely significant effects. These include impacts during both the construction, operational and decommissioning phases. Paragraph 11.5.9 highlights that the development could result in a permanent effect on the value of heritage assets through change to their setting.

The full methodology is outlined in section 11.8. Within this section, matrixes are provided which outline how the conclusions of the applicant's assessments will be categorised. The Borough Council is in agreement with the methodology proposed, however ideally this should be communicated through not only the ES matrix but also as 'harm' as set out in the National Planning Policy Framework. Further explanation of any mitigation measures that have been implemented within the design process or will be introduced as part of the development (eg. reinstatement of landscape features such as hedgerows which are required to be removed for the construction phase) should also be provided as part of the ES statement, to understand how imbedded mitigation measures have already been applied in order to inform the determined level of impact.

Coastal Processes and Coastal Change

The Council's Coastal Management Team notes that the land parcels currently being progressed for the proposed Advanced Water Recycling Plant and Pipeline Corridor are located inland of the Borough's Coastal Change Management Area.

Should the Long Sea Outfall option progress within the vicinity of the Hopton or adjoining coastlines, Great Yarmouth Borough Council would welcome continued engagement during the development of the proposals. The Council would also encourage engagement with East Suffolk Council's Coastal Management and Adaptation Team given the cross-boundary nature of coastal processes.

The Environmental Statement should assess any potential impacts of the Long Sea Outfall on:

- Coastal processes;
- Shoreline behaviour;
- Beaches, cliffs and coastal geomorphology;
- The nearshore environment; and
- Adjacent coastlines and receptors.

Appropriate mitigation measures should be identified where significant effects are identified.

Conclusion

Great Yarmouth Borough Council is generally satisfied that the proposed scope of the Environmental Impact Assessment is appropriate and has no further additional comments to make at this stage. The Council trusts that the matters raised above will be taken into account in the preparation of the Environmental Statement.

[redacted]
Principal Strategic Planner
Strategic Planning Team
Planning and Growth
Great Yarmouth Borough Council

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By email only:
SuffolkWRTS@planninginspectorate.gov.uk

CEMHD - Land Use Planning,
NSIP Consultations,
Building 1.2, Redgrave Court
Merton Road, Bootle,
Merseyside L20 7HS.
NSIP.applications@hse.gov.uk

Date: 10/09/2026

Dear Sir/Madam,

PROPOSED SUFFOLK WATER RECYCLING TRANSFER AND STORAGE PROJECT
PROPOSAL BY ESSEX AND SUFFOLK WATER LIMITED
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (AS AMENDED) REGULATIONS 10 AND 11

Thank you for your e-mail of dated 3/09/2026 regarding the information to be provided in an environmental statement relating to the above project.

HSE's land use planning advice:

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed "EIA scoping area" (taken to be the draft order limits) for this Nationally Significant Infrastructure Project is within the consultation zones of **three** major accident hazard sites, and **six** major accident hazard pipelines. This is based on the GIS EIA scoping boundary order limits Shapefile *"SWRTS_STN_DF1_EIAScopingBoundaryOrderLimits_Ply_v4_02072026 SHP.zip"* received by email on 08/09/2026.

The major accident hazard sites with hazardous substances consent are:

- National Grid plc's site at Lowestoft Holder Station, Gas Works Road, The Beach, Lowestoft, NR32 1UZ.
- Langton Green Silos site at Eye Airfield, Eye, Suffolk, IP23 7HE.

The Pipeline Safety Regulations 1996 notified major accident hazard pipelines identified, grouped by the operator, are:

- Cadent Gas Ltd:
  - Hopton / Corton, HSE Ref. 7419, Transco Ref. 1678.
  - Stubbs Green (Loddon) / Wisset Lodge, HSE Ref. 7420, Transco Ref. 1679.
  - Wisset Lodge / Saxmundham, HSE Ref. 7421, Transco Ref. 1680.
  - Saxmundham / Bredfield, HSE Ref. 7422, Transco Ref. 1681.
  - Martlesham / Redenhall pipeline, HSE Ref. 13398, Transco Ref. 2752.
- National Gas:
  - 5 Feed Yelverton / Diss Comp Tee, HSE Ref. 7447, Transco Ref. 1706.

The Applicant should contact the above operator(s) to verify the above and to inform an assessment of whether the proposed development is vulnerable to a possible major accident. There are three particular reasons for this

i. The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline.

ii. The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds.

iii. To establish the necessary measures required to alter/upgrade the pipeline to appropriate standards.

HSE's Land Use Planning advice is dependent on the location of areas where people may be present and the type of development proposed [HSE: Land use planning - HSE's land use planning methodology]. Based on the information in the document, EIA Scoping Report Volume I August 2026 [WA0210003-000005-WA0210003-331003515-Scoping-Report-Volume-I-Main-Report.pdf], it is not clear where there is building development and where people may be. Once the project is progressed and more information on types of development is provided, HSE can provide more specific advice.

Please note that the advice above is based on HSE's existing policy for providing land-use planning advice and the information which has been provided. HSE's advice in response to a subsequent planning application may differ should HSE's policy or the scope of the development change by the time the Development Consent Order application is submitted.

Would Hazardous Substances Consent be needed?

Based on the Scoping Report, it is not clear whether the applicant has considered the hazard classification of any chemicals that are proposed to be present at the development. For example, sometimes water treatment involves the use of hazardous substances (there is proposed water treatment in this NSIP). However, this may be because there are no relevant hazardous substances.

Hazard classification is relevant to the potential for accidents. Hazardous substances planning consent is required to store or use any of the Categories of Substances or Named Hazardous Substances set out in Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 as amended, if those hazardous substances will be present on, over or under the land at or above the controlled quantities. There is an "addition rule" in Part 4 of Schedule 1 for below-threshold substances.

Consideration of Risk Assessments:

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role in NSIPs is summarised in Advice Note 11, "working with public bodies in the infrastructure planning process", Annex G on the Planning Inspectorate's website: Nationally Significant Infrastructure Projects - Advice on working with public bodies in the infrastructure planning process, Annex G: The Health and Safety Executive - GOV.UK. This document includes consideration of risk assessments under the heading "Risk assessments".

No information was found in the EIA Scoping Report August 2026 related to the proposed development's vulnerability to potential major accident hazards such as those sites and pipelines identified above. Also, it was not clear if there was consideration of risk assessments arising from the development's work activities. We would advise this is considered further in line with Advice Note 11 Annex G, taking account of the following: *"it may be beneficial for applicants to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet the requirements of relevant health and safety legislation as design of the Proposed Development progresses"*. Note that there are no requirements for any risk assessments submitted to and approved by the relevant planning authority to also be considered by HSE.

Explosives Sites:

Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

CEMHD NSIP Consultation Team

Heveningham Parish Council – Response to Environmental Impact Assessment Scoping Opinion Consultation

Suffolk Water Recycling, Transfer and Storage Project

Dear Sir/Madam,

Heveningham Parish Council welcomes the opportunity to comment on the Environmental Impact Assessment (EIA) Scoping Opinion for the Suffolk Water Recycling, Transfer and Storage Project. The council wishes to make representations on the following topics, which reflect the environmental sensitivities and community concerns within our parish.

1. Ecology and Biodiversity

Heveningham supports a diverse range of rural habitats including hedgerows, watercourses, and ecologically valuable field margins. The council requests that the Environmental Statement (ES) includes:

- Full ecological surveys along any pipeline corridor or construction access routes that may pass near the parish.
- Assessment of impacts on protected species known to be present in the wider area.
- Consideration of hedgerow removal and disturbance to habitats during construction.
- Clear proposals for biodiversity net gain, including reinstatement of hedgerows.

2. Traffic and Transport – Construction Traffic and HGV Movements

Heveningham is served by narrow rural lanes with limited passing places. The council is concerned about the potential impact of construction traffic and HGV movements associated with pipeline installation and reservoir construction. The ES should therefore include:

- A detailed Construction Traffic Management Plan identifying expected HGV volumes, routing, peak periods, and access points.
- Assessment of road safety risks on rural roads and lanes within Heveningham and the wider area.
- Identification of sensitive locations including residential clusters and areas with restricted visibility.
- Measures to prevent rat-running or inappropriate diversion of construction traffic through Heveningham.
- Consideration of cumulative traffic impacts with other major projects in the region.

The council welcomes clear mitigation to minimise disruption and ensure safe operation throughout the construction period.

3. Noise and Disturbance During Construction

Heveningham is a quiet rural parish. The ES should assess:

- Construction noise and vibration from trenching and pipeline installation,

- The duration and intensity of disturbance, including any requirement for extended working hours.
- Impacts on nearby residential and business properties and community spaces.
- Measures to minimise noise, vibration, and general disturbance, particularly during early mornings and evenings.

4. Landscape and Visual Impact

The parish lies within a scenic rural landscape. The ES should include:

- Assessment of visual impacts from any aboveground infrastructure.
- Consideration of effects on rural landscape character and tranquillity
- Mitigation proposals such as screening, planting, and sensitive design of structures.

5. Public Rights of Way and General Community Impact

Heveningham has an active network of public rights of way used by residents and visitors. The ES should assess:

- Temporary closures or diversions of footpaths during construction.
- Impacts on recreational routes, access to the countryside, and community amenity.
- Measures to maintain safe access for walkers, residents, and landowners.

6. Cumulative Impact with Other NSIPs in the Region

The council notes that Suffolk is currently experiencing multiple Nationally Significant Infrastructure Projects (NSIPs). The ES should therefore include:

- A clear cumulative impact assessment considering overlapping effects on traffic, landscape, ecology, noise, and community amenity.
- Identification of combined pressures on rural infrastructure and the environment arising from multiple NSIPs operating within similar timeframes.
- A transparent methodology for assessing cumulative effects across the wider region.

Conclusion

Heveningham Parish Council would welcome these matters being fully addressed within the Environmental Statement and reflected in the Planning Inspectorate's Scoping Opinion.

We look forward to continued engagement as the project progresses.

Yours faithfully, Angela Colbridge Clerk to Heveningham Parish Council

Historic England

Environmental Services
Infrastructure Decisions and Application Service
Planning Inspectorate
c/0 QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Direct Dial: 01223 582721

Our ref: PL00800474
Your Ref: WA0210003

25 September 2026

Dear Ms Deery

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your letter of 9TH September 2026 consulting Historic England about the above EIA Scoping Report. This concerns a request for an EIA scoping opinion, accompanied by a Scoping Report submitted by the applicant. The proposed development would include an Advanced Water Recycling Plant (AWRP) and two water service reservoirs (SRs), interconnected by pipelines and possibly including a Long Sea Outfall pipe from the AWRP.

This development could, potentially, have an impact on a number of designated heritage assets and their settings in the area around the development sites, as well as impact on buried archaeological deposits in both terrestrial and marine environments. In line with the advice in the National Planning Policy Framework we would expect the Environmental Statement (ES) to contain a thorough assessment of the significance of heritage assets and the likely effects which the proposed development might have upon those assets and the elements which contribute to their significance.

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Historic England

Our initial assessment shows a number of designated heritage assets in the surroundings of the AWRP and SRs. The remit of Historic England includes grade I and II* listed buildings and Registered Historic Landscapes, Scheduled monuments and conservation areas. We would defer to the relevant local planning authorities on grade II listed buildings.

We would also expect the Environmental Statement to consider the potential impacts which the proposals might have upon those heritage assets which are not designated. These should also be included as heritage assets, designated or otherwise, as they are valued components of the historic environment. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that the applicants involve the Conservation Officers of the relevant local authorities and the archaeological staff at the relevant Historic Environment Record in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

If the heights of structures associated with the proposed development could have potential to be visible across a large area and could therefore affect the significance of heritage assets at some distance from this site itself we would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages could be a useful part of this along with modelling a Zone of Theoretical Visibility.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

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We have the following comments to make regarding the content of the Scoping Report:

The Scoping Report includes introductory comments on the proposals and assessment methodology as well as chapters on the Terrestrial Historic Environment and the Marine Historic Environment (pages 478 – 538 and 533 – 566, respectively). In addition, the report (Table 11-2-1, Appendix 11.2, pages 58-62) identifies some 41 buildings listed at grade I and II*, three Registered Parks and Gardens and eight Scheduled monuments within the study area. The proposed study area and general methodology for assessing designated heritage assets appears to be reasonable for the type of development proposed, although we would note that some heritage assets' settings extend further than others and the manner and degree to which their setting contributes to their significance varies. It is also the case that the degree to which settings contribute to significance is not necessarily indicated by the type or grade of designation. For instance, the setting of a grade II listed building could contribute more to its significance than that of a grade II* building, depending on the building in question. An EIA methodology should therefore be flexible enough to recognise this and not make assumptions about the potential for impact on the significance of individual assets based on grade of designation and distance from the proposed development alone.

Matters relating to archaeology are contained in a number of sections of the Scoping Report. We would like to offer some detailed comments on them at this stage.

Regarding **archaeology in the Terrestrial Historic Environment**, in chapter 2 (the proposed scheme) several of the proposed elements of the scheme could impact any below ground features and remains that may be present (Section 2.2.1). This includes elements of the main development as well as the associated infrastructure (Section 2.2.6). Details will need to be provided about the depths of impact for all the various elements so that the potential impacts to the historic environment can be properly understood.

It is noted that some elements of the proposed scheme may require piled foundations. We would recommend that the Historic England document 'Piling and Archaeology' (2019) is referred to in order to understand the potential risks to the historic environment: https://historicengland.org.uk/images-books/publications/piling-and-archaeology/.

It is understood that the proposed construction methods have not been finalised yet. It is stated in Section 2.4.8 and 2.4.17 that Horizontal Directional Drilling (HDD) may be used to install

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pipelines in key areas. If this technique will be utilised, the potential issues associated with bentonite slurry outbreak will need to be considered as part of drilling fluid breakout method statement in terms of the impact (both direct and indirect) that this may have on any buried archaeological remains.

2.4.13 states that the majority of the underground pipeline will be installed using a trenched open-cut method. The minimum depth of the trenches is expected to be between 0.9m to 1.2m, with the majority of the pipelines expected to be less than 3m. In some cases, trenches 3-5m in depth may be used to avoid constraints (Section 2.4.14). This potential impacts of the pipeline trenches will need to be considered, both in terms of the physical impacts from excavation, but also through potential changes to the local water environment. This is particularly important if the proposed elements of the scheme are located in areas of peat or near watercourses. We would recommend that the Historic England document 'Preserving Archaeological Remains' (2016) is referred to, to understand the potential impacts that could occur from changes to the local water environment: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.

In chapter 9 (the Water Environment) it should be noted that information within this chapter will be of value to the archaeological assessments. This includes highlighting where waterlogged deposits may be present and the deposits that are conducive to preserving organic archaeological and palaeoenvironmental remains. We would recommend that the information is shared with the archaeological specialists, and the different specialists collaborate in order to maximise the opportunities to understand the risks and impacts of the proposed development.

9.4.23 states that the study area includes deposits of archaeological and palaeoenvironmental potential, such as the alluvium and peat. These sorts of deposits have the potential to provide evidence of how the landscape and environment changed over time, but also to preserve organic remains and structures (e.g. wood trackways, boats, wooden and leather objects etc.). The impact of the proposed scheme on these sorts of deposits should be considered as part of the ongoing assessment work.

Table 9-29 summarises the likely significant effects on the water environment during the proposed development's construction. Some of the issues highlighted in this table could also impact the historic environment. For example, it is stated that there is potential for the release of polluting substances from site activities. Contamination may alter the preservation of nearby archaeological sites, leading to the degradation and/or loss of remains. Contamination may

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also make sites inaccessible for further work, either due to health and safety reasons or by limiting the scientific analysis that could be carried out on archaeological materials in the future (e.g. radiocarbon dating). We would recommend that the Historic England document 'Land Contamination and Archaeology' (2017) is referred to: https://historicengland.org.uk/images-books/publications/land-contamination-and-archaeology/.

Table 9.29 highlights issues of dewatering that may occur during construction activities. It is further stated in Table 9.30 that long-term dewatering could occur as a result of the proposed development. Dewatering can impact the preservation of organic archaeological and palaeoenvironmental remains, leading to their degradation and/or loss. It should be noted that the impacts of dewatering may extend outside of the red-line boundary of the proposed scheme, impacting sites located in adjacent areas. We would recommend that this issue is considered as part of the historic environment assessment, and that the Historic England document 'Preserving Archaeological Remains' (2016) document is referred to: https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/.

Table 9.29 states that compression of soils by machinery may occur during construction. The potential impacts on vulnerable archaeological remains and deposits should be considered as part of the historic environment assessment. This could include the physical damage to remains or changes to the preservation conditions by altering the existing sub-surface flow paths.

It is stated in Table 9.31 that ground investigation works will be carried out, including groundwater monitoring to assess the effects of dewatering. We would recommend that this information is shared with the archaeological specialists to aid the assessments of potential impacts to the historic environment.

Table 9.32 states that soil compaction will be reduced during construction by minimising the number of construction vehicles and the frequency of their passing close to sensitive receptors. We are pleased to see that the location of sensitive heritage receptors will be included in the Outline Construction Environmental Management Plan (OCEMP), which will control access routes for construction vehicles (Section 11.7.7). This will help to avoid unnecessary encroachment on, or near to sensitive heritage assets.

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In chapter 11 (Terrestrial Historic Environment) paragraph 11.4.3 outlines the sources that will be used within the Historic Environment Desk-based Assessment (HEDBA). We would recommend that BGS borehole records are also utilised to understand the geology and to develop preliminary deposit models for key areas of the route (e.g. where there will be deeper impacts and where HDD has been proposed). Deposit models help to characterise the sequence of deposits present and understand the archaeological and palaeoenvironmental potential of the area. They can also help inform the evaluation strategy, such as the choice of geophysical technique. We would recommend that the Historic England document 'Deposit Modelling and Archaeology' (2020) is referred to: https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/.

Section 11.4 outlines what is currently known about the historic environment for the different areas of the proposed scheme. It is clear that the scheme crosses through a busy archaeological landscape, with remains spanning the prehistoric to the present day. It is noted that there is no mention of the potential for palaeolithic remains to be present in the area of the proposed LSO; this is discussed in Chapter 12 (Section 12.4.6) as part of the Marine Historic Environment assessment, but we would recommend that it is also discussed in relation to the onshore archaeology area.

It is noted that some areas of the proposed scheme have either not been previously developed, or have only had limited archaeological investigations carried out to date (e.g. the proposed AWRP (Section 11.4.13), the proposed LSO (Section 11.4.26), the proposed CSR (Section 11.4.35), proposed WSR (Section 11.4.45), the proposed AWRP to River Waveney Pipeline (Section 11.4.59), the proposed Barsham WTW to CSR Pipeline (Section 11.4.71) and parts of the proposed CSR to WSR Pipeline (Section 11.4.88)). There is therefore the potential for previously unknown archaeological remains to be present in these areas.

11.4.99 states that the alluvial deposits adjacent to the River Yox may contain palaeoenvironmental/waterlogged archaeological remains, which is good to see. It is important that the DBA considers palaeoenvironmental evidence/potential as part of the discussions.

Section 11.5 outlines the likely impacts that may occur as a result of the proposed development. This includes direct impacts to buried archaeological remains during the construction (Section 11.5.2), which could damage and/or remove deposits and remains of

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interest. We agree that this would represent a significant adverse effect without mitigation in place.

We are pleased to see that the potential impacts from changes to the local water environment during the Operation phase have been highlighted in Section 11.5.8. It is not clear why these potential impacts are not also discussed during the Construction phase, despite the issue being highlighted in Chapter 9 (Water Environment, Section 9.8.18).

It is noted that changes to the local hydrology could affect the preservation of archaeological and palaeoenvironmental features and remains, which is good to see. We agree that any changes could result in significant adverse effects prior to mitigation.

We are pleased to see that the primary mitigation approach will be to avoid impacts to the historic environment where possible. This may include mitigation through changes to the design of the proposed scheme or the use of trenchless technologies (Section 11.7.2).

It is stated that where impacts cannot be avoided, mitigation by record would be required. This could include geophysical survey, trial trench evaluation, excavation, geoarchaeological and palaeoenvironmental investigations and/or archaeological monitoring and recording (Sections 11.7.4 & 11.8.2). These approaches are what we would expect to see.

It is good to see that the need for hydrological assessments has been recognised where sites are being considered for preservation, or where changes to the local water environment may occur (Section 11.7.5).

In chapter 11 (Terrestrial Historic Environment) paragraph 11.4.3 outlines the sources that will be used within the Historic Environment Desk-based Assessment (HEDBA). We would recommend that BGS borehole records are also utilised to understand the geology and to develop preliminary deposit models for key areas of the route (e.g. where there will be deeper impacts and where HDD has been proposed). Deposit models help to characterise the sequence of deposits present and understand the archaeological and palaeoenvironmental potential of the area. They can also help inform the evaluation strategy, such as the choice of geophysical technique. We would recommend that the Historic England document ‘Deposit

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Modelling and Archaeology' (2020) is referred to: https://historicengland.org.uk/images-books/publications/deposit-modelling-and-archaeology/.

Section 11.4 outlines what is currently known about the historic environment for the different areas of the proposed scheme. It is clear that the scheme crosses through a busy archaeological landscape, with remains spanning the prehistoric to the present day. It is noted that there is no mention of the potential for palaeolithic remains to be present in the area of the proposed LSO; this is discussed in Chapter 12 (Section 12.4.6) as part of the Marine Historic Environment assessment, but we would recommend that it is also discussed in relation to the onshore archaeology area.

It is noted that some areas of the proposed scheme have either not been previously developed, or have only had limited archaeological investigations carried out to date (e.g. the proposed AWRP (Section 11.4.13), the proposed LSO (Section 11.4.26), the proposed CSR (Section 11.4.35), proposed WSR (Section 11.4.45), the proposed AWRP to River Waveney Pipeline (Section 11.4.59), the proposed Barsham WTW to CSR Pipeline (Section 11.4.71) and parts of the proposed CSR to WSR Pipeline (Section 11.4.88)). There is therefore the potential for previously unknown archaeological remains to be present in these areas.

11.4.99 states that the alluvial deposits adjacent to the River Yox may contain palaeoenvironmental/waterlogged archaeological remains, which is good to see. It is important that the DBA considers palaeoenvironmental evidence/potential as part of the discussions.

Section 11.5 outlines the likely impacts that may occur as a result of the proposed development. This includes direct impacts to buried archaeological remains during the construction (Section 11.5.2), which could damage and/or remove deposits and remains of interest. We agree that this would represent a significant adverse effect without mitigation in place.

We are pleased to see that the potential impacts from changes to the local water environment during the Operation phase have been highlighted in Section 11.5.8. It is not clear why these potential impacts are not also discussed during the Construction phase, despite the issue being highlighted in Chapter 9 (Water Environment, Section 9.8.18).

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It is noted that changes to the local hydrology could affect the preservation of archaeological and palaeoenvironmental features and remains, which is good to see. We agree that any changes could result in significant adverse effects prior to mitigation.

We are pleased to see that the primary mitigation approach will be to avoid impacts to the historic environment where possible. This may include mitigation through changes to the design of the proposed scheme or the use of trenchless technologies (Section 11.7.2).

It is stated that where impacts cannot be avoided, mitigation by record would be required. This could include geophysical survey, trial trench evaluation, excavation, geoarchaeological and palaeoenvironmental investigations and/or archaeological monitoring and recording (Sections 11.7.4 & 11.8.2). These approaches are what we would expect to see.

It is good to see that the need for hydrological assessments has been recognised where sites are being considered for preservation, or where changes to the local water environment may occur (Section 11.7.5).

In chapter 19 (Ground Conditions) it is stated in Section 19.1.2 that this chapter should be read in conjunction with Chapter 11 (Terrestrial Historic Environment), which is good to see. Information of value to the Historic Environment assessment will be produced as part of the assessment of ground conditions. A collaborative approach will allow the information to be shared between the different specialists to ensure that opportunities to understand the historic environment are maximised.

19.4.2 lists the sources used to define the baseline information for the study area. This include information that will be of value to the archaeological assessment, such as the BGS borehole data. This information will be used to understand the geology and hydrogeology, but it will also provide information about the archaeological and palaeoenvironmental potential of an area.

19.5.7 states that ground investigation works will be undertaken to inform the design of the proposed development. The information obtained may also be of value to the archaeological assessments and we would recommend that the data is shared between the different specialists.

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As regards **archaeology in the Marine Historic Environment**, there are three options under consideration for the outfall from the AWRP. Two of these options would see a connection made to existing outfall systems, but Option 1 is the possible construction of a new Long Sea Outfall (LSO) to discharge Concentrated Residual Water (CRW) which could extend 1.2km offshore from Hopton-on-Sea. This could have an impact on archaeological deposits in the marine environment and we would like to offer some detailed comments on chapter 12 of the Scoping Report (Marine Historic Environment) at this stage.

In reference to paragraph 12.1.6 of Chapter 12 we would note that our historic seascapes characterisation initiative enables us to contribute advice as to how the Marine Management Organisation spatially identifies marine character areas for marine planning purposes. Historic seascapes should not be identified as a heritage asset or used as an EIA 'receptor'. We recommend that a 2km-wide study corridor centred on the LSO is used beyond the EIA Scoping Area boundary, as used for other marine developments for the reasons set out in paragraph 12.2.3. We agree with the approach set out in paragraphs 12.3.2 and 12.3.3 especially to coordinate geo-archaeological deposit modelling that spans the coastal zone.

Paragraph 12.4.3 makes a false distinction between designated and non-designated heritage assets. Furthermore, paragraph 12.4.18 (and 12.8.6) also seems to imply a distinction between heritage assets as either designated or non-designated which is misleading. Any subsequent ES should be informed directly by how heritage assets are defined in the UK Marine Policy Statement and English Marine Plans (see UKMPS, paragraph 2.6.6.5). For the reasons set out in paragraph 12.4.14 and 12.4.21 vis. positional uncertainty of losses, we must highlight the potential for this project could encounter presently unknown heritage assets.

We concur with the likelihood of significance adverse effects as summarised in paragraph 12.5.2, and we therefore agree with paragraph 12.6.1 that no impacts potentially resulting from Option 1 will be scoped out of the assessment (as summarised in Table 12-4).

Paragraph 12.7.2 mentions "...presence and value of archaeological remains" and we refer the Applicant to the UK Marine Policy Statement to ensure that appropriate terminology is used to describe a heritage asset's 'significance' in any subsequent ES.

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Paragraph 12.7.4 conflates mitigation and off-setting measures. It is important that all parties understand that any agreed Protocol for Archaeological Discoveries (PAD) system is primarily focussed on facilitating rapid communication between key stakeholders and implementation of emergency measures to limit further degradation of materials of possible archaeological interest, which were previously unknown. It is therefore important to acknowledge that recording of archaeology after impact has occurred, or before any loss, does not reduce harm or magnitude of impact. Although investigating archaeology at risk of loss or that has been inadvertently disturbed is essential and should reduce the loss of knowledge and understanding, it cannot reduce the actual harm. Residual effects are therefore likely which require attention within any ES produced, as acknowledged in paragraph 12.8.13.

It is worth highlighting in paragraph 12.8.1 that targeted coring in areas of geoarchaeological potential is a prerequisite for production of a sedimentary ground deposit model. We also do not agree with the statement made in paragraph 12.8.4 regarding the use of the *Design Manual for Roads and Bridges LA 104 Environmental Assessment and Monitoring (2020)* as the "...relevant best practice guidance for the assessment of likely significant effects on the marine historic environment". We therefore take this opportunity to direct the Applicant to other, more suitable guidance, such as *Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects* (2021), published by The Crown Estate, London; and *Marine Geophysics Data Acquisition, Processing, and Interpretation* Guidance Notes (2nd Edition), published by Historic England.

Paragraph 12.8.10 and Table 12-2 (Magnitude of Impact Criteria) will require further refinement in any subsequent ES to adequately identify "major/beneficial" impact given that "extensive restoration; major improvement of attribute quality" would be unachievable in a marine context and therefore will necessitate further attention within any ES produced for this proposed project.

Section 12.4.6 discusses the potential for Cromer Forest-bed Formation (CFbF) deposits to be present in the area of the proposed LSO, which is good to see. CFbF deposits have produced archaeological evidence of international significance at Happisburgh (Norfolk) and Pakefield (Suffolk), so we are pleased to see that the potential is being considered. It is noted that no archaeological finds are presently known from CFbF deposits at the nearby site of Corton (Section 12.4.7), but it should be noted that the palaeoenvironmental evidence preserved within the deposits is also important.

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It is good to see that the potential extension of the CFbF offshore will also be investigated, using marine geophysical surveys and geotechnical investigations (Section 12.4.8). We would recommend that the archaeological specialists help to plan the offshore investigation works to ensure that opportunities are maximised to recover information of value.

Section 12.5 discusses the likely significant effects that may occur as a result of the Proposed Development. This includes direct and indirect impacts from construction of the LSO to features and remains present within the seabed or sub-seabed (Section 12.5.2). We are pleased to see that potential issues associated with changes to the coastal processes will also be considered (Section 12.5.4) as this can lead to the exposure and erosion of buried remains.

We are pleased to see that the primary mitigation measure for marine heritage will be avoidance and preservation (Section 12.7.2). It is noted that Archaeological Exclusion Zones (AEZs) will be established around sensitive features and remains, which is good to see (Section 12.7.2).

12.7.3 states that primary mitigation will also include specialist archaeological analysis and interpretation by marine archaeologists of any geophysical survey data and geotechnical samples. We are pleased to see that the data will be shared with relevant specialists. We would recommend that the archaeological specialists help to plan these works to ensure that opportunities are maximised to recover information of value.

12.7.4 states that secondary mitigation will include watching briefs (archaeological monitoring) of any intrusive works carried out in the foreshore or intertidal zone during the construction phase, and the development of a project-specific Protocol for Archaeological Discoveries (PAD). The approaches are what we would expect to see.

Given the number and proximity of highly graded designated heritage assets within the remit of Historic England in the area as well as the potential for impact on archaeological deposits in the terrestrial and marine environments we consider there is potentially a significant impact from the development on them. We are therefore likely to have substantive comments to make

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and would welcome early discussions with the applicant in order to agree the detail of methodologies and key sites and setting issues which will need to be addressed within the EIA.

If you have any queries about any of the above, or would like to discuss anything further, please contact us.

Yours sincerely

[redacted]

e-mail: [redacted]@historicengland.org.uk

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From: [redacted]
Sent: Tuesday, October 06, 2026 14:53
To: Suffolk WRTS
Subject: Fw: Proposed Application By Essex and Suffolk Water. Ref; WA0210003

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Dear Claire Deery,

Many thanks for your correspondence dated 2nd September 2026. regarding the proposed Suffolk Water Recycling, Transfer and Storage Development.

Hoxne Parish Council considered the proposal at its monthly meeting last night and the following comments were made;
The Council has no overall objection to the scheme, but concern was raised on transferring water from this area to another part of the region when water supplies around the Hoxne area are already limited.. A situation which may be made worse by the expansion of agro- industry locally which will make further demands on water supplies.

Hopefully this is helpful.

Yours sincerely,

[redacted]

Chair; Hoxne Parish Council.

Rishabh Rai

From: JNCC Offshore Industries Advice <OIA@jncc.gov.uk>
Sent: 04 September 2026 17:05
To: Suffolk WRTS
Cc: JNCC Offshore Industries Advice
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping - JNCC Response

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Good Afternoon,

Thank you for consulting JNCC on the Suffolk Water Recycling Transfer and Storage - EIA Scoping consultation.
JNCC advises on activities and operations located in UK offshore waters.
As activities and operations are fully inshore and onshore it would not be within JNCC remit to comment.
As such JNCC have not reviewed this application and will not be providing further comment.

Please contact me with any questions regarding the above comments

Kind regards,

[redacted]
Offshore Industries Advice Officer
Marine Management Team
JNCC, Inverdee House, Baxter Street, Aberdeen, AB11 9QA
Tel: 01224 083522
Working pattern: Monday to Friday
Website **Twitter** **Facebook** **LinkedIn**
Sign up to the JNCC Nature News monthly enewsletter



From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 03 September 2026 20:19
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Dear Sir/Madam

Please see attached correspondence on the proposed **Suffolk Water Recycling Transfer and Storage**.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf of the Secretary of State, as to the scope and level of detail of the information to be provided within the

Leiston-cum-Sizewell Town Council

Council Offices, Main Street, Leiston, Suffolk, IP16 4ER
Tel: 01728 830388 **| Email:** townclerk@leistontowncouncil.gov.uk

Response of Leiston-cum-Sizewell Town Council to the Suffolk Water Recycling, Transfer and Storage (SWRTS) Project Preferred Options Consultation

Leiston-cum-Sizewell Town Council recognises the strategic importance of securing long-term water resilience across Suffolk and Essex and acknowledges that the proposed Suffolk Water Recycling, Transfer and Storage Project has a key role in supporting the construction and operation of Sizewell C, as well as wider regional water supply requirements. The Council therefore accepts the underlying need for the project.

However, the Council wishes to register significant concerns regarding the cumulative impacts of this proposal on our parish when considered alongside the ongoing construction of Sizewell C, itself a nationally significant infrastructure project. At the anticipated peak construction period, local communities are already expected to experience substantial disruption arising from construction traffic, highway management measures, workforce movements, environmental disturbance and landscape change.

The Town Council is particularly concerned that the addition of a further major infrastructure project within the same geographic area could result in:

- Increased cumulative traffic impacts on local and strategic road networks.
- Additional road closures, diversions and traffic management arrangements.
- Further pressure on communities already surrounded by major construction activity.
- Increased construction noise, dust and visual intrusion.
- Additional impacts on local habitats, woodland, agricultural land and biodiversity.
- Construction fatigue and reduced quality of life for residents who have already borne significant impacts associated with the Sizewell C development.

The Council considers that the applicant must demonstrate, through robust cumulative impact assessment, how the proposed works will interact with existing and approved Sizewell C infrastructure and construction activities. In particular, the Council seeks assurance that newly constructed highways, utility corridors and associated infrastructure delivered as part of the Sizewell C project will not subsequently be disturbed or excavated again for SWRTS works, resulting in avoidable disruption, additional environmental damage and poor value for public investment.

The Council expects the applicant to work closely with Sizewell C, Suffolk County Council and other relevant stakeholders to ensure infrastructure planning is coordinated and opportunities for shared corridors, joint working and reduced land take are fully explored. Should the project proceed, the Town Council strongly believes that meaningful mitigation and community benefit measures must be secured within the affected parishes.

These measures should go beyond simply minimising harm and should deliver lasting environmental improvements for communities experiencing the impacts of nationally significant infrastructure development.

The Council therefore recommends consideration of:

- Natural flood management measures throughout affected catchments.
- Creation and restoration of wetlands, ponds and water retention features to support flood resilience and biodiversity.
- Habitat creation and ecological enhancement projects delivering measurable biodiversity gain beyond statutory requirements.
- Woodland, hedgerow and landscape enhancement schemes.
- Long-term environmental stewardship arrangements within affected parishes.
- Climate change mitigation initiatives, including carbon sequestration projects and green infrastructure.
- Community environmental funds to support locally identified resilience, biodiversity and sustainability projects.
- Improvements to public access, green spaces and recreational routes affected by construction activities.

The Council considers that parishes hosting nationally significant infrastructure projects should receive tangible and enduring environmental benefits that help offset the cumulative impacts experienced by local communities.

In conclusion, while Leiston-cum-Sizewell Town Council recognises the strategic need for the SWRTS Project and its role in supporting regional water resilience and the delivery of Sizewell C, the Council remains concerned about the cumulative effects of multiple concurrent NSIP developments within the parish. The Council therefore requests that cumulative impacts, infrastructure coordination, environmental protection and meaningful local mitigation form central considerations as the project progresses towards its Development Consent Order application.

Rishabh Rai

From: Loddon Town Council Clerk <clerk@loddontowncouncil.gov.uk>
Sent: 23 September 2026 14:09
To: Suffolk WRTS
Cc: Admin and allotment officer
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Dear Sir/Madam

Thank you for consulting Loddon Town Council regarding the Environmental Statement scoping for the Suffolk Water Recycling, Transfer and Storage project (WA0210003).

Having reviewed the information available, the proposed development does not appear to directly impact Loddon. The Town Council therefore does not have any comments to make in relation to the scope of the Environmental Statement at this stage.

Best wishes
[redacted]

[redacted]
Town Clerk

Loddon Town Council
The Old School, Church Plain,
Loddon, Norwich, NR14 6EX

01508 [redacted] (Office is open 9am – 12 midday, Tuesday, Wednesday and Thursday)
01508 [redacted] (Emergencies only)
[redacted]

www.loddontowncouncil.gov.uk
www.facebook.com/LoddonTC

Please note that I work part-time hours and I am available Monday – Wednesday.

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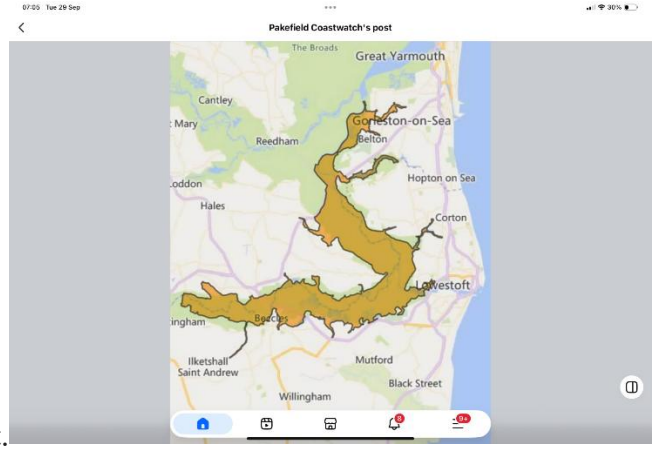
From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 09 September 2026 11:07
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Suffolk Water Recycling Storage and Transfer Project – Amendment to deadline for receipt of scoping request responses

Lound Parish Council met on 28/09/2026 to discuss the proposed Suffolk Water Recycling Transfer and Storage development.

The following is their response:

1. As it will take a large amount of electricity to power this site, what will be the impact of supplying this? Will the power cables be buried or overhead?
2. What consideration has been made regarding the loss of good quality agricultural land (a finite resource) and the consequent effect on food sustainability?
3. Light and noise pollution - What will be the effect on local biodiversity and wildlife following the installation? The |Parish Council are particularly concerned about the effects of night time light pollution on the species of bats, mice and owls that are prevalent.
4. What measures will be taken to ensure that the waste products that will be pumped back into the sea will cause as little effect as possible on the marine life in the area considering that the waste will be more concentrated than before?
5. What effect will this have on recreational use of the sea for local residents and the tourist industry?
6. How much effect will the additional outflow have on coastal drift and coastal erosion?
7. What precautions will be taken to mitigate the risks in the event of any leaks? Where would the waste matter be predicted to end up if leaks were to occur? There are concerns that if sites 3.2 or 3.3 were used any leakage could flow towards Lound Lakes which is the supply of drinking water for local residences in the Northern Lowestoft area.
8. What will be the impact on Lound Lakes nature reserve?
9. In the event of a major flood in the area how will this be managed, in particular a tidal flood? The proposed locations are on low lying ground and with rising sea levels the water could come in via Brandon water and up the Waveney estuary. The flood alert below from Pakefield Weather Watch was issued this week and shows the flood alert in this instance reaching the base of Lound lakes which is an increasingly frequent event.



10. What would happen in the event of a flood in Waveney? Would the outflow from the plant continue or would it all get discharged into the sea, and would that be from the proposed outflow or the existing outflow?

Rishabh Rai

From: SM-MMO-SH - MFA Marine Consents (MMO) <marine.consents@marinemanagement.org.uk>
Sent: 04 September 2026 10:15
To: Suffolk WRTS
Subject: Re: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

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Marine Licensing, Wildlife Licences and other permissions

Dear Sir/Madam,

Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009.

Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.

Applicants should be directed to the MMO's online portal to register for an application for marine licence

https://www.gov.uk/guidance/make-a-marine-licence-application

You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in English waters.

[redacted]
Maritime and Coastguard Agency

Spring Place
105 Commercial Road
Southampton
SO15 1EG

www.gov.uk/mca

Your ref: WA0210003

2nd October 2026

Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Via email: suffolkwrts@planninginspectorate.gov.uk

Dear Planning Inspectorate

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your letter dated 9th September 2026 inviting comments on the Scoping Report for the proposed Suffolk Water Recycling Transfer and Storage Project. The Scoping report has been considered by representatives of Marine Safety and PNT Services, and the Maritime and Coastguard Agency (MCA) would like to respond as follows:

The MCA has an interest in the works associated with the marine environment, and the potential impact on the safety of navigation, access to ports, harbours and marinas and any impact on our search and rescue obligations. The MCA would expect any works in the marine environment to be subject to the appropriate consents before carrying out any marine licensable works.

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We note that the key marine components of the proposed development are:

- A proposed long sea outfall ('LSO') to dispose of the concentrated residual water ('CRW') from the proposed Advanced Water Recycling Plant (AWRP) which has three potential options at the feasibility stage:

    - Option 1: A new offshore LSO, comprising a new pipeline discharging the CRW offshore via a diffuser.
    - Option 2: A connection to the existing Anglian Water (AW) outfall network at Lowestoft Water Recycling Centre (WRC).
    - Option 3: A new pipeline from the proposed AWRP to the existing Ness Point outfall structure, connecting into AW infrastructure at the point of discharge.

Although the applicant should confirm, it appears from Figure 1-3 in Volume III of the Scoping Report that the location of the proposed works for the LSO - Option 1 is outside of Statutory Harbour Authority (SHA) Limits and therefore the safety of navigation within these waters falls to the MCA. As vessels on approach to the two ports in the vicinity have the potential to be impacted by the construction works for the proposed outfall pipe and any infrastructure remaining in situ; the Port of Great Yarmouth (Peel Ports) and the Port of Lowestoft (ABP) should be consulted on the marine works as they may wish to issue local notices to mariners.

There may be commercial, recreational and fishing activities taking place and vessels may need to deviate around the site during construction. During the operational phase, the outfall pipeline and diffuser may have the potential to reduce the navigable water depth referenced to chart datum by more than 5%. We would also expect the impact on other marine users and vessel activity to be considered during the operational phase as part of the application, and any risks to be suitably mitigated. We note that at present maritime navigation is proposed to be scoped out of the assessment of the operational and decommissioning phases of the Proposed Development.

Maritime navigation during the construction phase as a topic is scoped in and is covered in various chapters in the Scoping report; within chapter 13 Traffic and access, chapter 17 Socio-economics, chapter 18 Human health and chapter 22 Major accidents and disasters.

We understand from Section 13.5.11 that for onshore works "*it is anticipated that crossings of rivers and navigable watercourses will be undertaken using trenchless construction techniques*" so would not entail any works below Mean High Water Springs.

Section 13.5.10 of the Scoping Report states that a Navigation Risk Assessment (NRA) will be undertaken and used to inform the Traffic and access chapter of the Environmental Statement (ES) which we welcome. However, Section 17.5.10 states that "*A Navigation Risk Assessment will be submitted in support of the DCO application (should the final design of the Proposed Development include Option 1 of the LSO component)"*. It should be noted that for any works below the Mean High-Water Springs, the MCA would expect an NRA to be undertaken proportionate to the scale of works. The NRA will establish how the phases of the project are managed to a point where risk is reduced and considered to be 'as low as reasonably practicable' (ALARP). The NRA will be provided as an appendix to ES.

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NRA methodology
As the Scoping Report does not set out the proposed methodology or approach for the NRA, the MCA would welcome consideration of the International Maritime Organisation's Formal Safety Assessment methodology.

Navigation baseline and impact assessment
The navigation baseline should draw on current vessel traffic data, nautical charts and relevant publications. This evidence should inform the assessment of navigational effects during and after installation of the outfall, including effects on identified impact pathways and local vessel operations. The NRA should include an under-keel clearance desktop study to assess the proposed works on vessels transiting the area.

Consultation
To ensure that data is captured for non-AIS vessels in the NRA, the applicant should consult with recreational users such as sailing, angling and kayak groups as the construction and post installation site of the outfall may present a changed navigational environment for marine users. We recommend engaging with other local marine users such as the RNLI stations at the Port of Great Yarmouth and the Port of Lowestoft. Section 17.6.4 states that localised displacement of fishing activity may occur in the vicinity of the infrastructure, the MCA recommends that the applicant engages with local fishing groups as part of their project consultation.

Marine traffic topic
We note that Table 13-19 includes receptors for marine traffic and includes "*Potential disruption to vessel movements, navigation routes and port operations and access to marine infrastructure*" which is scoped in on page 626. However, the same marine traffic receptor and Effects are also scoped out on page 631. The MCA would expect no effects to be scoped out of the assessment with regards to shipping and navigation, pending the outcome of the Navigation Risk Assessment and further stakeholder consultation. Maritime navigation should be scoped in during the construction and operational phases of the project due to any potential impacts of parts of the LSO being surface laid or a diffuser remaining permanently in situ. We note the proposed mitigation measures in Section 18.4.92 include "*standard industry controls (e.g. Notices to Mariners, guard vessels, and stakeholder liaison*)" which we welcome.

Outfall construction methodology
From Section 2.4.8 we understand for the proposed LSO that "*the HDD section would either extend directly up to 1km offshore and terminate with a diffuser structure or extend up to 500m offshore and join with a 500m section laid within a trench on the seabed extending out to the diffuser structure"*. When plans are further developed, it would be helpful to see the location of the LSO Option 1 on a nautical chart showing co-ordinates and the distance of the outfall out into sea. These details would show the heights of the outfall pipe in the water column if surface laid and also the height of the diffuser structure which will enable the applicant to assess if there will be a loss of navigable depth in relation to the outfall works.

NRA Terminology
Section 17.6.3 states that "*Navigational risks arising from the presence and operation of the LSO (Option 1) are anticipated to be manageable and ALARP compliant subject to standard mitigation measures and stakeholder engagement*", this statement should be evidenced by a proportionate NRA. Section 18.4.82 continues that *"These (significant) effects may result from the establishment of*

temporary exclusion or safety zones, increased construction vessel movements, and interaction with established routes used by commercial, fishing and recreational users". The reference to "**safety zones"** is incorrect. The Notice to Mariners can contain details of "advisory" areas to be avoided or request vessels remain a specified distance away from either a vessel or installation. 'Safety zones' in this context is not a recognised term, and they are not legally enforceable. We note that in the Chapter for Major Accidents and Disasters that on page 1129 there is a further reference to "*implementation of exclusion zones*" which as above should have the word "temporary" added prior to "exclusion zones".

Potential loss of navigable water depth
If option 1 for the LSO is selected and any part of the outfall pipeline is surface laid, then there will be a potential loss of navigable depth in the surrounding waters. The MCA would be willing to accept up to a 5% maximum reduction in surrounding navigable depths referenced to Chart Datum. Where this is not achievable, the applicant must discuss further with the MCA. However, there may be areas where any depth reduction could be significant such as in areas in shallower depths. This will be particularly relevant where depths are decreasing towards shore, at cable crossings, and where potential impacts on navigable water depth increase. In these cases, the MCA would expect discussion with the applicant to ensure safe, navigable waters are maintained.

Moreover, if any part of LSO Option 1 is to be surface laid then the entry in table 22:4 of the Major Accidents and Disasters chapter on page 1111 would need to be updated to include the potential snagging risk or reduction in under keel clearance for Operational phases of the project.

I hope this is helpful at scoping stage,

Yours faithfully,

[redacted]

[redacted]
Marine Licensing Project Lead
Marine Safety & PNT Services

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Technical Guidance Note 287

Third-party guidance for working near National Grid Electricity Transmission equipment

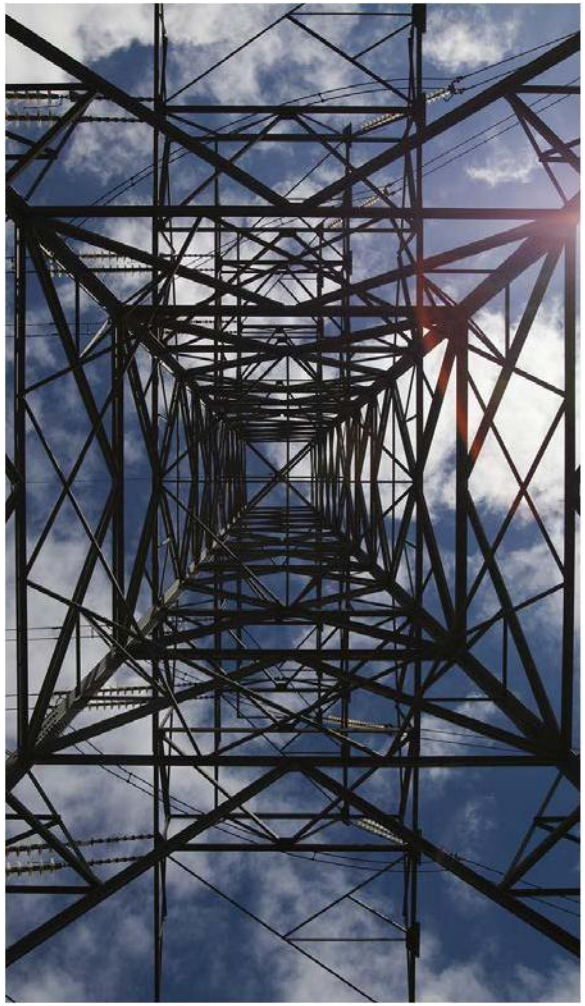


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Disclaimer
National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.

Purpose and scope

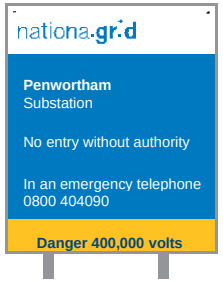
The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

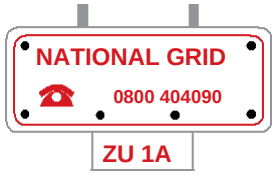
In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations
The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines
The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment

Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.

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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could ‘flashover’ and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, ‘avoiding danger from overhead power lines’, and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.



Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

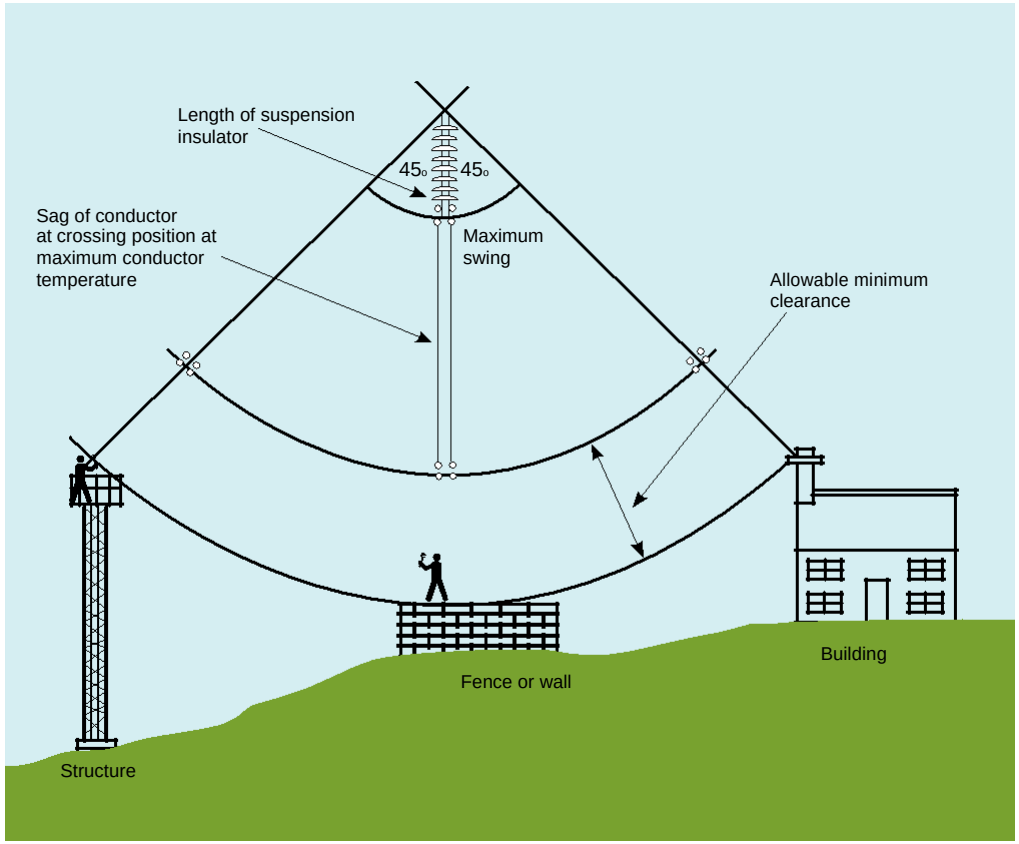
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be layed in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum seperation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

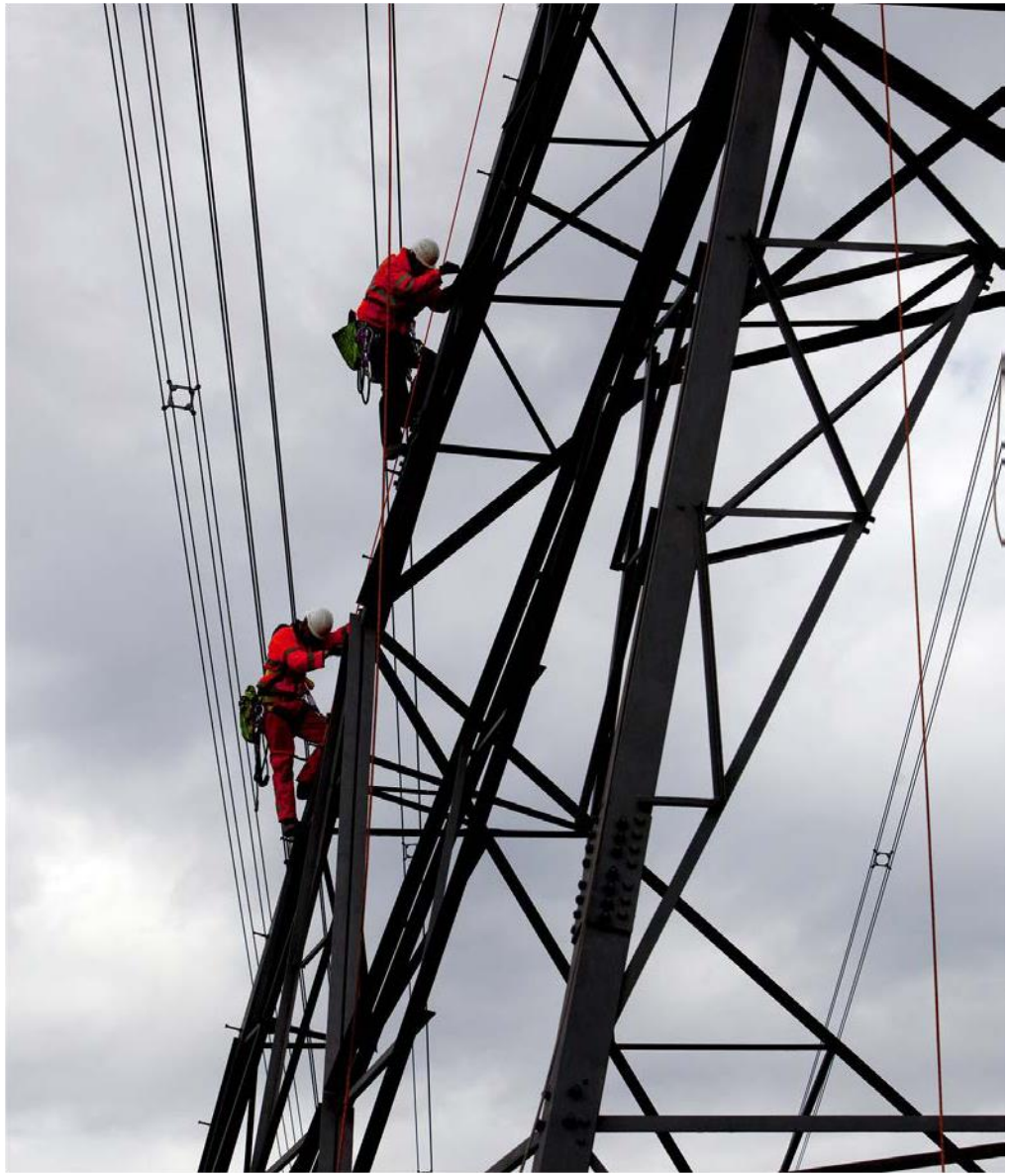
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed.
In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire *(as outlined in ENA TS 43-8)*.

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit **www.emfs.info.**



200m

The minimum distance that should be maintained from National Grid assets when quarry blasting

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice.* The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

(i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line

(ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

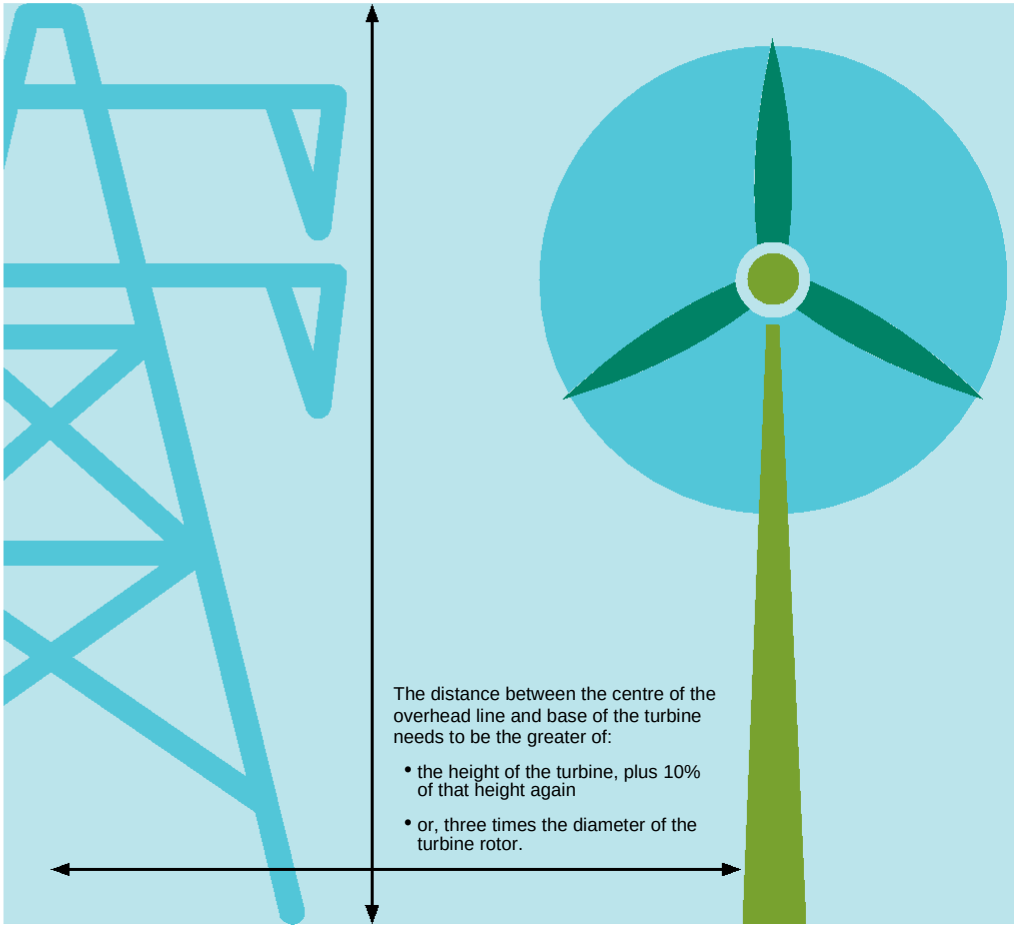
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

Section continues on next page »

Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line

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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

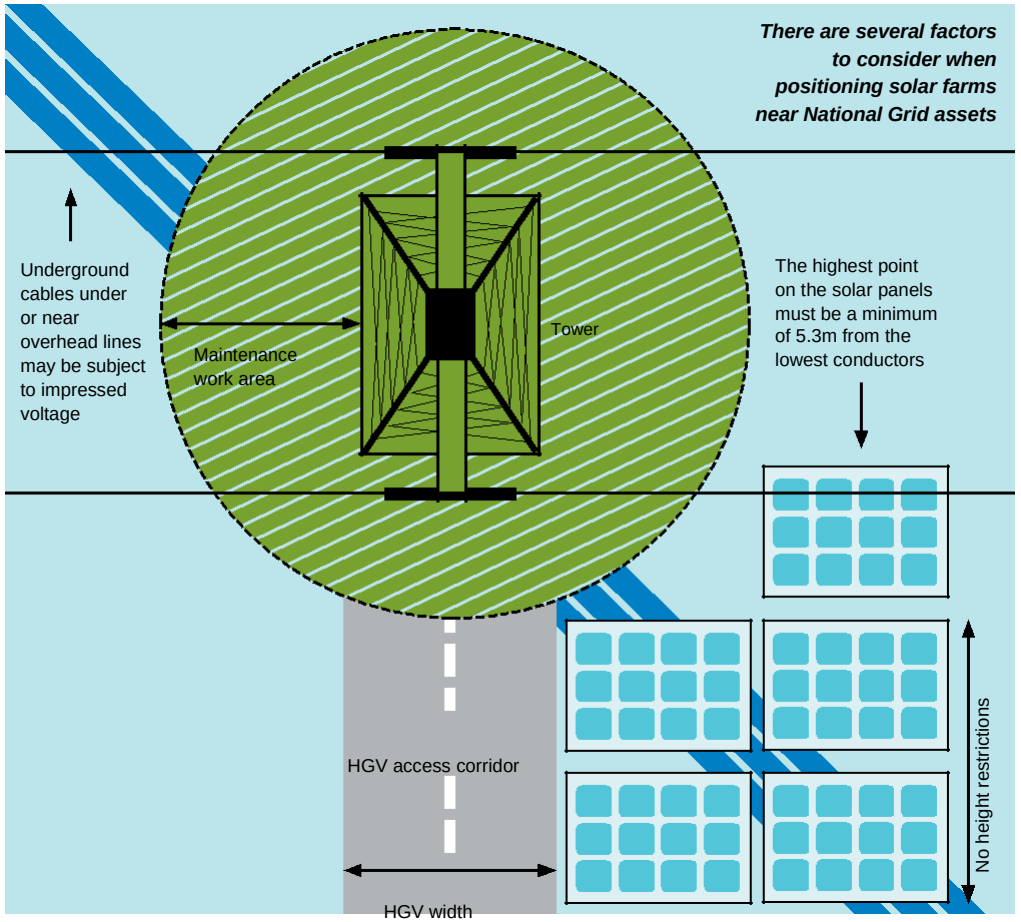
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles, including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.

Diagram not to scale



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)[1]
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

[1] It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

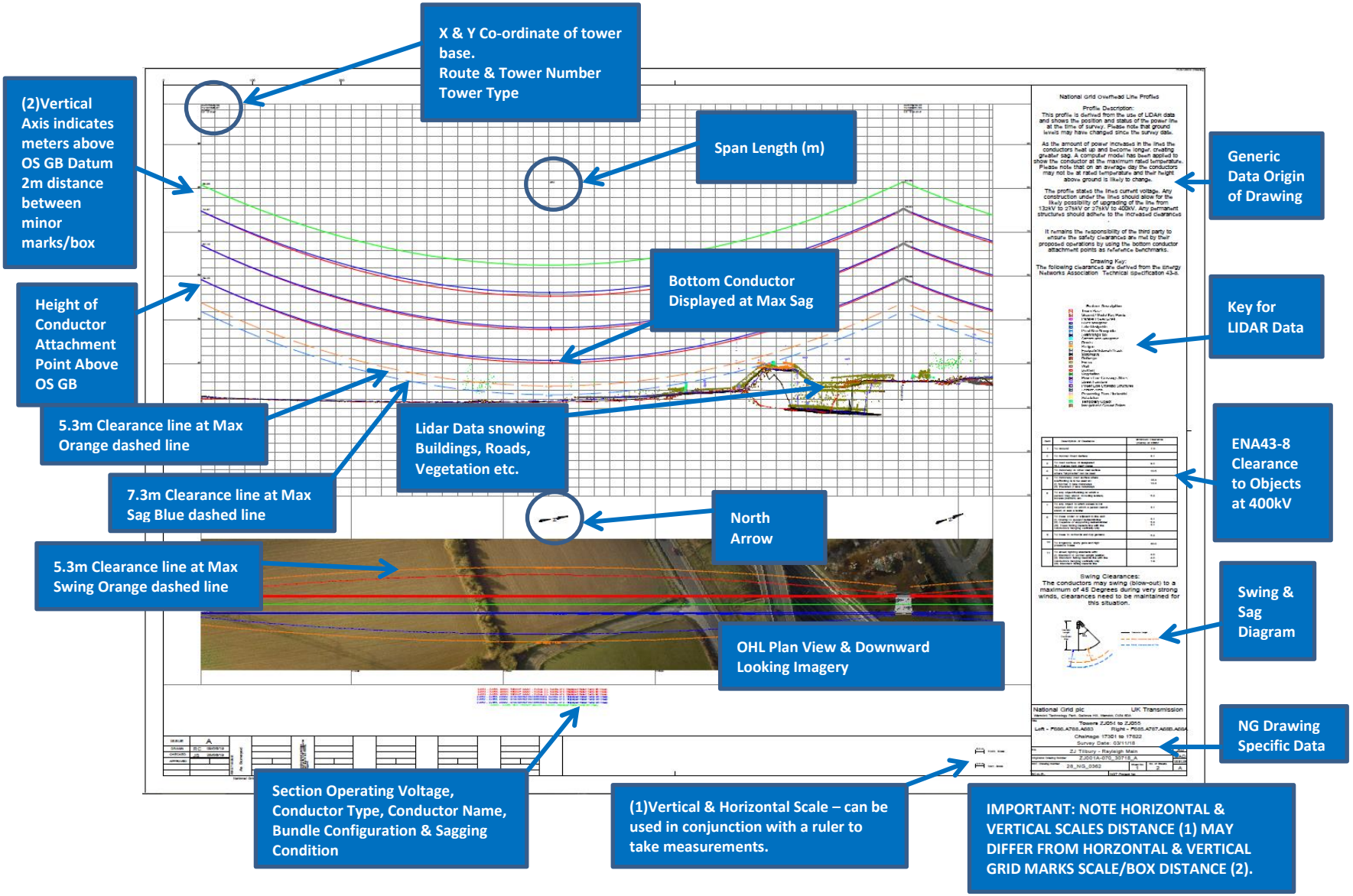
Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

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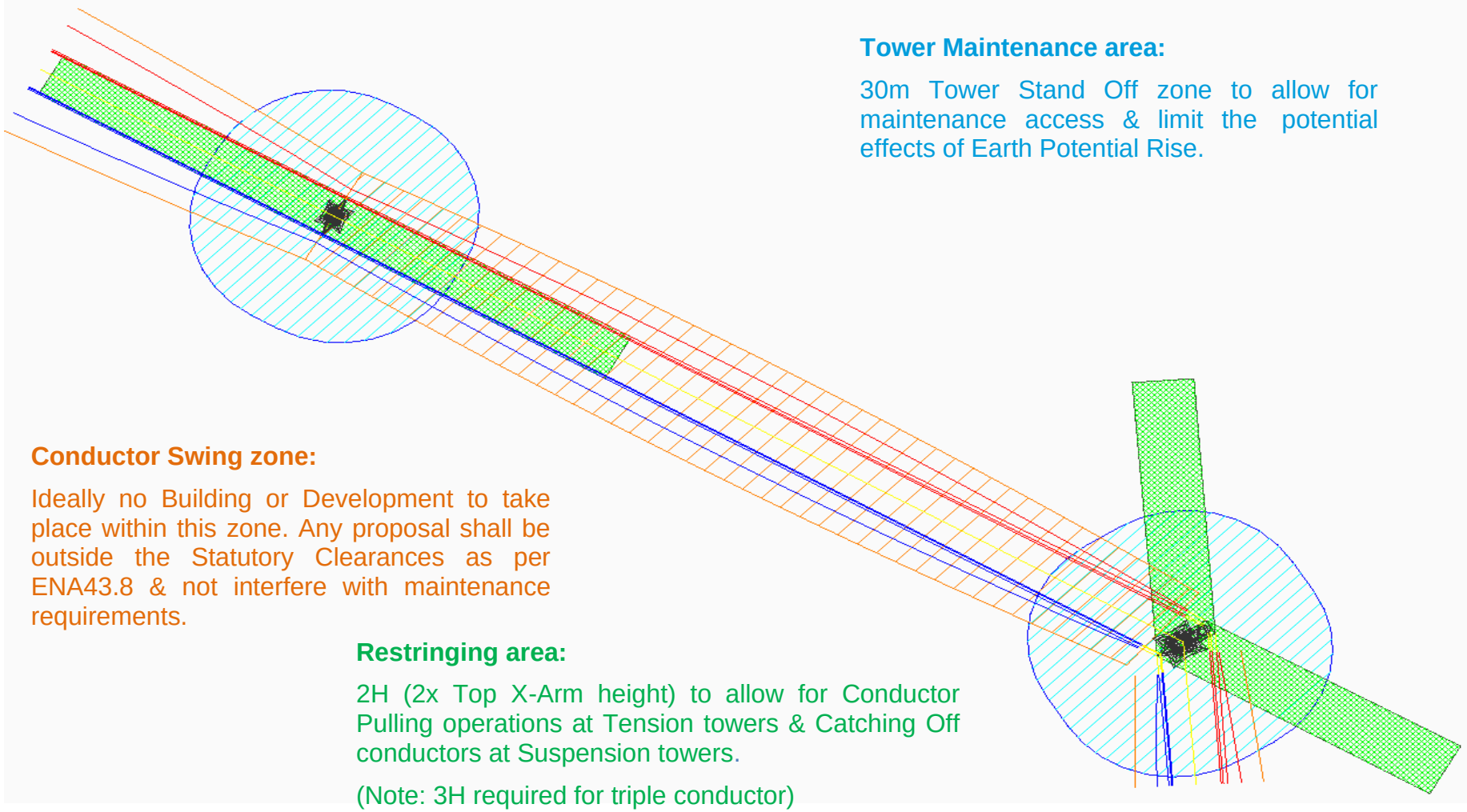
14 APPENDIX A

OHL Profile Drawing Guide



15 APPENDIX B

OHL Tower Stand Off & Reconductoring Area



Tower Maintenance area:

30m Tower Stand Off zone to allow for maintenance access & limit the potential effects of Earth Potential Rise.

Conductor Swing zone:

Ideally no Building or Development to take place within this zone. Any proposal shall be outside the Statutory Clearances as per ENA43.8 & not interfere with maintenance requirements.

Restringing area:

2H (2x Top X-Arm height) to allow for Conductor Pulling operations at Tension towers & Catching Off conductors at Suspension towers.

(Note: 3H required for triple conductor)

Rishabh Rai

From: box.assetprotection <box.assetprotection@nationalgas.com>
Sent: 07 September 2026 13:24
To: Suffolk WRTS
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

> You don't often get email from box.assetprotection@nationalgas.com. Learn why this is important

Rishabh,

Thank you for your email.

Regarding planning application WA0210003, there are no National Gas Transmission assets in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

[redacted]
Asset Protection, National Gas Transmission

+44 (0)[redacted]
+44 (0)[redacted]
[redacted]nationalgas.com

National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com I **Twitter** I **LinkedIn**

Please consider the environment before printing this email.

National Gas | Business Use

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 03 September 2026 20:19
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

> You don't often get email from suffolkwrts@planninginspectorate.gov.uk. Learn why this is important

[EXTERNAL EMAIL] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish'.

National Grid House
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Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
SuffolkWRTS@planninginspectorate.gov.uk

30 September 2026

Dear Sir/Madam

RE: APPLICATION BY Essex and Suffolk Water (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE Suffolk Water Recycling Transfer and Storage (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 2nd September 2026 in relation to the above proposed application. This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

Having reviewed the scoping report, we would like to make the following comments regarding NGET existing or future infrastructure in close proximity to the current red line boundary.

NGET has high voltage electricity substations and overhead transmission lines within close proximity the scoping area. The overhead lines form an essential part of the electricity transmission network in England and Wales.

Existing Infrastructure

Substation

- Sizewell B 400kV Substation
- Sizewell 132kV Substation
- Leiston 132KV Substation

Associated overhead and underground apparatus including cables

Overhead Lines

4ZW ROUTE 400kV	BRAMFORD - SIZEWELL 1
	BRAMFORD - SIZEWELL 4
4ZX ROUTE 400kV	BRAMFORD - SIZEWELL 3
	BRAMFORD - SIZEWELL 2
4YM ROUTE 400kV	BRAMFORD - NORWICH MAIN 1

We enclose plans showing the location of NGET's apparatus in the scoping area.

In addition, GIS shapefiles of approximate locations of our national electricity transmission network are freely available from here: https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps. You can also check if your works will affect our transmission network by using the Line search website: https://lsbud.co.uk/.

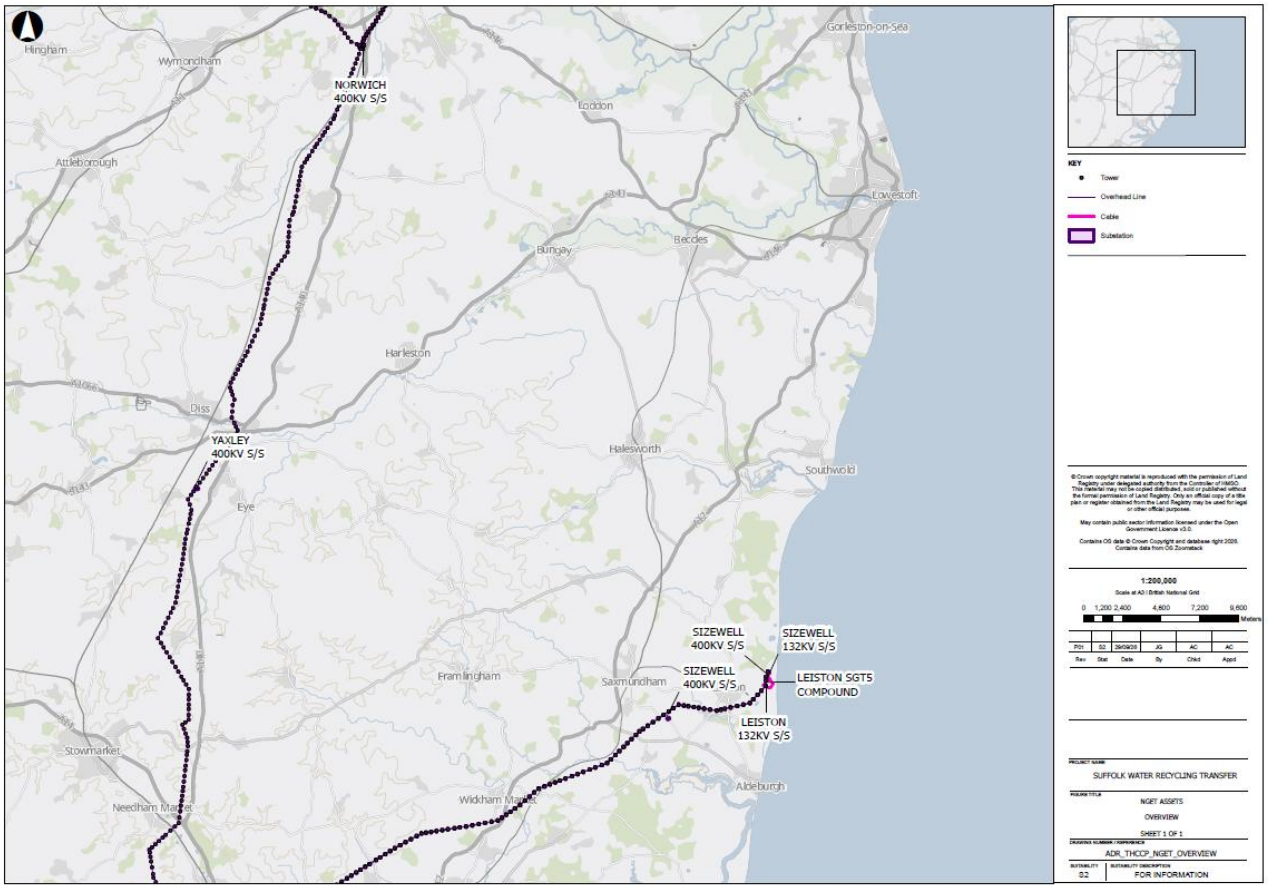


Figure 1: NGET Assets in proposed development area

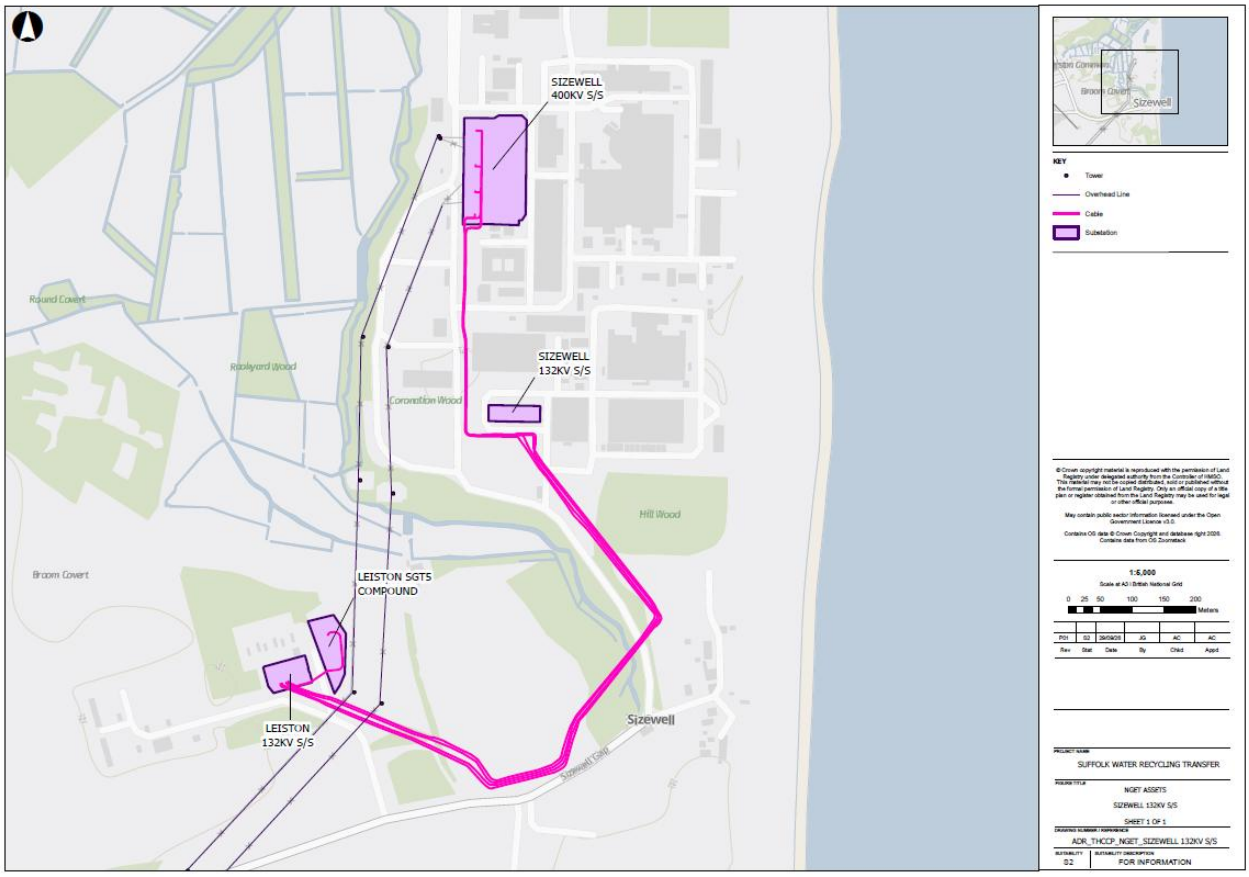


Figure 2: NGET's Sizewell B 400kV Substation, Sizewell 132kV Substation and Leiston 132KV Substation

New infrastructure

The National Energy System Operator (NESO) took over the electricity network planning responsibility from National Grid Electricity System Operator Limited (NGESO) on the 1st October 2024. Please consult with NESO separately from NGET where further information on the strategic need or capacity is sought.

Please refer to the Holistic Network Design (HND) and the NESO website to view the strategic vision for the UK's ever growing electricity transmission network:https://www.neso.energy/publications/beyond-2030/holistic-network-design-offshore-wind; and https://www.neso.energy/publications/beyond-2030

If appropriate add a statement that re-emphasizes what's planned e.g. Future upgrade projects are proposed for the Yorkshire and the Humber area. These projects are at early stages of development.

Onshore Infrastructure

Sea Link
Sea Link is a proposed new 138 km primarily offshore high voltage electricity link between Kent and Suffolk.

Sea Link is a key part of The Great Grid Upgrade, the largest overhaul of the electricity grid in generations. On 5 May 2026, the Planning Inspectorate (PINS) concluded its 6-month examination of our development consent order (DCO) application.

Since 5 November 2025, multiple rounds of hearings and written submission deadlines have taken place at which those interested could attend and give their views. The project is currently awaiting its decision from the Secretary of State. It is anticipated that decision will be made in October/ November. For more information about our application or the examination process, please see the dedicated Sea Link page on the Planning Inspectorate website.

It should be noted that there may be further interactions with additional new strategic infrastructure where the projects are in their early development.

NGET requests that all existing and future assets are given due consideration given their criticality to the high-voltage transmission of electricity across the UK. We remain committed to working with the promoter in a proactive manner, enabling both parties to deliver successful projects wherever reasonably possible. As such we encourage that ongoing discussion and consultation between both parties is maintained on interactions with existing or future assets, land interests, connections or consents and any other NGET interests which have the potential to be impacted prior to submission of the Proposed DCO.

The Great Grid Upgrade is the largest overhaul of the electricity grid in generations, we are in the middle of a transformation, with the energy we use increasingly coming from cleaner greener sources. Our infrastructure projects across England and Wales are helping to connect more renewable energy to homes and businesses. To find out more about our current projects please refer to our network and infrastructure webpage. https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects. Where it has been identified that your project interacts with or is in close proximity to one of NGET's infrastructure projects, we would welcome further discussion at the earliest opportunity.

These projects are all essential to increase the overall network capability to connect the numerous new offshore wind farms that are being developed, and transport new clean green energy to the homes and businesses where it is needed.

The following points should be taken into consideration.

Specific Comments – Electricity Infrastructure:

- NGET's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. NGET recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 5 (2019)".

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors. When those conductors are under their worst conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

- NGET high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide NGET full right of access to retain, maintain, repair and inspect our assets. Hence, we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with NGET prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Further Advice

NGET requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

We hope the above information is useful. If you require any further information, please do not hesitate to contact the Land Development Liaison team. In the meantime, we look forward to receipt of further information and consultation relating to potential impacts on our assets.

The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity customer services.

Yours faithfully,

[redacted]

Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

NH Ref: NH/26/17853
Your Ref

Email: suffolkWRTS@planninginspectorate.gov.uk

Operations (East)
National Highways
Woodlands
Manton Lane
Bedford MK41 7LW

30 September 2026

Dear Sir/Madam

Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

National Highways has reviewed Chapter 13 (Traffic and Access) of the EIA Scoping Report.

It is noted that the chapter identifies potential interaction with the Strategic Road Network (SRN), principally the A47 corridor in the vicinity of Lowestoft and Great Yarmouth, together with locations on the A12 where construction traffic may route to elements of the Proposed Development.

Based on the information reviewed to date, National Highways agrees that Traffic and Access should remain scoped into the Environmental Impact Assessment (EIA) given the scale, geographical extent and duration of construction activities proposed across Suffolk and Norfolk, together with the potential for construction traffic, workforce travel and abnormal load movements to affect the operation, capacity and safety of the SRN.

National Highways notes that the assessment methodology is currently high level and that further refinement of the study area, traffic forecasting assumptions, construction routing strategy and assessment scenarios will be undertaken as the design progresses through the Environmental Statement (ES) stage. The proposed approach to engage with National Highways on the study area, baseline data collection, traffic forecasting and assessment methodology is welcomed as the scheme progresses.

National Highways notes that interaction with the SRN may include:

- The proposed Advanced Water Recycling Plant (AWRP) north of Lowestoft, potentially accessed from the A47 corridor via Jay Lane or Station Road Roundabout (which should be included within the study area);

- The Long Sea Outfall (LSO) options located adjacent to the A47 corridor (the nearest SRN junction should be included within the study area);
- Pipeline corridors crossing or running adjacent to the A47 (the nearest SRN junction should be included within the study area); and
- Pipeline works in proximity to the A12 (the nearest SRN junction should be included within the study area).

National Highways advises that the ES and supporting Transport Assessment (TA) should include a highway study area agreed with National Highways. The study area should include all SRN links and junctions where traffic associated with the Proposed Development could result in a material impact on safety, capacity or operation. This should include consideration of:

- A47 corridor junctions serving the AWRP and LSO works;
- A12 junctions serving works associated with the Covered Storage Reservoir (CSR), Saxmundham pipeline and Sizewell-related infrastructure;
- Identification and assessment of SRN links and junctions where construction traffic associated with the Proposed Development is forecast to result in a material increase in traffic demand or operational impacts; and
- Any other SRN locations identified through traffic assignment modelling.

National Highways welcomes the Applicant's intention to identify a robust worst-case construction scenario. The TA should clearly define:

- Peak construction year;
- Peak daily two-way HGV movements;
- Peak workforce numbers;
- Peak daily staff vehicle trips;
- Temporal overlap of multiple construction work fronts;
- Construction material sourcing assumptions; and
- The balance between road-based and non-road freight movements.

Particular attention should be given to cumulative construction activities occurring simultaneously across multiple project components, as these may represent the realistic worst-case impact on the SRN.

National Highways notes the intention to use empirical traffic counts, TEMPro growth forecasts and, where appropriate, outputs from the Suffolk County Transport Model. The Applicant should agree with National Highways:

- Baseline year;
- Assessment years;
- Committed development assumptions;
- Forecast growth assumptions;
- Junction assessment requirements; and
- Any strategic modelling requirements necessary to understand cumulative impacts on the SRN.

The proposed HGV routing strategy should be developed in consultation with National Highways and the relevant Local Highway Authorities. The Construction Traffic Management Plan (CTMP) should demonstrate:

- Appropriate use of the SRN for longer-distance HGV movements;
- Minimisation of impacts on local communities where practicable;
- Suitable routing between the SRN and all principal compounds and access points;
- Management of any temporary traffic management affecting SRN operation;
- Details of any proposed temporary traffic management measures in proximity to the SRN and demonstration that such measures would not adversely affect the safe and efficient operation of the network;
- Mitigation measures to reduce the number of construction-related trips on the SRN during peak periods, including both workforce and freight movements; and
- Measures to reduce single-occupancy vehicle trips by construction workers, including workforce travel planning measures, opportunities for shared transport, shuttle bus provision where appropriate, car sharing initiatives and suitable staff parking management arrangements.

The Scoping Report identifies the potential requirement for Abnormal Indivisible Loads (AILs) associated with construction plant and equipment. National Highways advises that the following should be set out within the CTMP/ supporting documents:

- The likely nature, scale and frequency of abnormal loads;
- An outline Abnormal Indivisible Load Strategy, including identification of likely ports of entry, indicative routes to construction compounds, route constraints and any anticipated mitigation requirements;
- Any required mitigation works on the SRN should be identified at an early stage; and
- Engagement should continue with National Highways regarding route approvals and movement management arrangements.

National Highways supports the proposed review of Personal Injury Collision (PIC) data. The assessment should specifically consider:

- Existing collision clusters on affected SRN links and junctions within the most recent five-year period;
- Potential effects arising from increased construction traffic associated with peak construction activities;
- Temporary construction accesses and crossings, where applicable; and
- Any requirement for Road Safety Audits associated with alterations to SRN infrastructure, where applicable.

Where construction activities interfere with SRN facilities used by pedestrians, cyclists and equestrians, the Applicant should demonstrate that safe and convenient movement is maintained throughout the construction period and that any required diversions are appropriately designed, signed and managed.

National Highways welcomes the proposed cumulative assessment approach. The ES should include cumulative assessment with committed and reasonably foreseeable

developments which may affect the same sections of the SRN, including other Nationally Significant Infrastructure Projects (NSIPs), major energy infrastructure projects, Sizewell-related development and strategic housing and employment growth proposals within Suffolk and Norfolk.

National Highways notes the Applicant's proposal to scope out most operational traffic effects associated with pipeline assets and several decommissioning effects on the basis that traffic generation would be negligible. National Highways has no in-principle objection to this approach, subject to the TA demonstrating through forecast traffic data that operational traffic associated with the AWRP, CSR and WSR would not result in material effects on the SRN and that pipeline maintenance activities would remain de minimis.

Based on the information currently available, National Highways agrees that Traffic and Access should be scoped into the EIA. National Highways generally agrees with the proposed assessment methodology, the identification of receptors and the approach to considering construction traffic effects. However, further engagement with National Highways will be required as the design develops to agree the final study area, traffic forecasting assumptions, traffic assignment methodology, construction scenarios, cumulative developments, modelling requirements and the extent of SRN junction assessment.

National Highways therefore offers no objection to the proposed scope of the Traffic and Access assessment. The matters identified within this response should be considered during the preparation of the ES, TA, CTMP and associated application documents to ensure that the impacts of the Proposed Development on the safe and efficient operation of the SRN are appropriately assessed and, where necessary, mitigated.

Subject to the above, National Highways has no further comments at this stage but requests ongoing engagement as the application progresses.

Please note, this response should not be interpreted as confirming the acceptability of the development proposal or its impacts on the SRN. These matters will be considered once the supporting information have been submitted and reviewed.

Yours sincerely

[redacted]
Spatial Planner
National Highways
Operations (East)

Rishabh Rai

From: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Sent: 04 September 2026 14:37
To: Suffolk WRTS
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification [SG42162]

You don't often get email from natssafeguarding@nats.co.uk. Learn why this is important

Our Ref: SG42162

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk

NATS Internal

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 03 September 2026 20:19
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Date: 01 October 2026
Our ref: 558012
Your ref: WA0210003

suffolkwrts@planninginspectorate.gov.uk

BY EMAIL ONLY

Consultations
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 900

Dear Claire Deery

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Proposed application by Essex and Suffolk Water Limited (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development).
Location: Primarily located in East Suffolk and Mid-Suffolk, with components spanning from Saxmundham & Leiston towards the south, Finningham to the west & Lowestoft to the north.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 02 September 2026, received on 03 September 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

Natural England and the Environment Agency have been regularly attending meetings (referred to as the Environmental Stakeholder Forum) with the Applicant. Natural England will continue constructive engagement throughout the pre-application process with the Applicant to provide advice on topics included within our statutory remit.

For any further advice on this consultation please contact consultations@naturalengland.org.uk.

Yours sincerely

[redacted]
Norfolk and Suffolk Area Team

Annex A – Natural England's Advice on EIA Scoping

1. General principles

1.1. Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided[1].
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES

2. Cumulative and in-combination effects

2.1. The ES should fully consider the implications of the whole development proposal including all supporting works and infrastructure.

2.2. An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

a. existing completed projects
b. approved but uncompleted projects
c. ongoing activities
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an

[1] National Infrastructure Planning Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements (see Insert 2 – information to be provided with a scoping request)

application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Table 1 includes a non-comprehensive list of plans and projects that are proposed in the location of or in close proximity to this proposal.

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Status
Babergh and Mid Suffolk Joint Local Plan	Scoping Consultation (Regulation 20 (4)) completed.
East Suffolk Local Plan	Scoping Consultation (Regulation 20 (4)) completed.
The Greater Norwich Local Plan	Scoping Consultation (Regulation 20 (4)) completed.
Great Yarmouth Local Plan	Scoping Consultation (Regulation 20 (4)) Underway
South Norfolk Village Clusters Housing Allocations Plan	Under Examination
Local Plan for the Broads (Broads Authority)	Under Examination
Sizewell C NSIP	Post-Decision
LionLink Interconnector NSIP	Pre-Application
Sea Link NSIP	Decision
EcoPower Suffolk Solar NSIP	Pre-Application
Norwich to Tilbury NSIP	Recommendation

3. Environmental data

3.1. Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at http://www.naturalengland.org.uk/publications/data/default.aspx.

3.2. Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

3.3. Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

3.4. Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

4.1. General Principles

4.1.1. The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

4.1.2. Ecological Impact Assessment (EcIA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. Guidelines have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

4.1.3. We refer you to the National Planning Statement for water resources infrastructure (Defra, July 2025), which sets out guidance in Section 4.3 on how to take account of biodiversity and nature conservation interests.

4.2. International and European sites

4.2.1. Natural England consider that all relevant International designated Sites have been identified in the EIA Scoping Report - Volume 1: Main Report (August 2026) (further referred to as 'the Scoping Report') and most have been summarised in Table 6-3. It is noted that marine designated sites are summarised in a separate table (table 8-3) and it would be clearer if all identified Internationally designated Sites were presented within one table.

4.2.2. The Scoping Report sets out in table 6-1 that a 10km study area has been used for Internationally designated Sites and extended to include Sites that are hydrologically linked to the proposed development. It is also noted that designated Sites located further than 2km from the EIA Scoping Area where no impact pathways are evident will be scoped out from further assessment. Natural England advise that biodiversity receptors which could experience a Likely Significant Effect (LSE) as a result of this project cannot be screened out by distance alone. Instead, LSE (and therefore scope of the ES) should be identified by the consideration of any potential impact pathways.

4.2.3. Natural England's Impact Risk Zones incorporate Internationally designated Sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

4.2.4. The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas (SPA), Special Areas of Conservation (SAC), listed Ramsar sites, candidate SAC and proposed SPA.

4.2.5. Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

4.2.6. European site conservation objectives are available at http://publications.naturalengland.org.uk/category/6490068894089216.

4.3. Nationally designated sites - Sites of Special Scientific Interest

4.3.1. Natural England note and agree with the Sites of Special Scientific Interest (SSSIs) that have been identified in table 6-4 of the Scoping Report. However, there are some sites that have been omitted, which we advise are included in the EcIA. They include:

- Sprat's Water and Marshes, Carlton Colville SSSI
- Halvergate Marshes SSSI
- Breydon Water SSSI
- Leiston - Aldeburgh SSSI
- Alde-Ore Estuary SSSI

4.3.2. Their omission may be because they are further than 2km away from the Scoping Area. However, these sites include features that could be impacted by activities at distances greater than 2km. For example, wintering Bewick's swan, which are a feature of Alde-Ore Estuary SSSI, can feed over distances of 10km.

4.3.3. SSSIs are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

4.3.4. Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

4.3.5. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

4.4. Regionally and Locally Important Sites

4.4.1. Natural England welcome the inclusion of Locally designated Sites identified in table 6-4 and advise the Applicant contacts the local wildlife trust, geoconservation group or local sites body in this area for further information and to ensure the list is comprehensive.

4.4.2. The ES will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures.

4.5. Protected species

4.5.1. The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.

4.5.2. The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

4.5.3. The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

4.5.4. Natural England has adopted standing advice for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

4.5.5. Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing Natural England wildlife licences. Applicants can also make use of Natural England's charged service Pre Submission Screening Service for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning for details of the LONI process.

4.6. District Level Licensing for great crested newts

4.6.1. Natural England is aware that the Applicant has considered applying to use the District Level Licencing scheme for great crested newts (GCN).

4.6.2. Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

4.6.3. The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism

to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

4.6.4. If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

4.6.5. The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

4.6.6. By demonstrating that the DLL scheme for GCN will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

4.7. Priority Habitats and Species

4.7.1. It is noted in the Scoping Report that Coastal and intertidal habitats during the operational phase have been scoped out of further assessment. Natural England advise that further information is required to justify this conclusion. We ask the Applicant to define what they consider to be the coastal and intertidal regions and to demonstrate that the discharge point and likely flow/dispersal pathways are beyond coastal and intertidal zones.

4.7.2. Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found here. Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

4.7.3. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to download. Further information is also available here.

4.7.4. Natural England notes the summary of Priority and Irreplaceable Habitats recorded in table 6-5 of the Scoping Report. An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

4.7.5. The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal

- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

4.8. Ancient Woodland, ancient and veteran trees

4.8.1. Paragraph 10.6.1 of the Scoping Report states that ancient woodland and veteran trees 15m from the Order Limits will be scoped out of the assessment. Natural England advise that 15 metres is considered a minimum distance and refer the Applicant to the Natural England and the Forestry Commission standing advice on ancient woodland, ancient and veteran trees, which provides further guidance on buffer zones.

4.8.2. The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

4.8.3. Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 4.3.18 of the National Policy Statement for water resources infrastructure (Defra, 2025) states that, "*Developers should identify ways to avoid negative effects on ancient woodland and ancient and veteran trees."* It states the Secretary of State should not grant development consent that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.

4.8.4. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. The wood pasture and parkland inventory sets out information on wood pasture and parkland.

4.8.5. The ancient tree inventory provides information on the location of ancient and veteran trees.

4.9. Biodiversity net gain (BNG)

4.9.1. The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. Natural England notes in the Scoping Report that the applicant is developing a BNG Implementation Plan (paragraph 6.8.23) and they acknowledge that BNG for NSIPs will be mandatory by the time that the Development Consent Order (DCO) application is submitted (paragraph 6.8.25).

4.9.2. BNG outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

4.9.3. Local Nature Recovery Strategies (LNRS) are a new mandatory system of spatial strategies for nature established by the Environment Act 2021. The Norfolk LNRS

and Suffolk LNRS were both published in October 2025 and identify strategic priorities for nature protection, recovery, and enhancement. Given the size and scale of the project, there are opportunities not only for enhancing biodiversity in the locality, but also to create and enhance ecological connectivity in the area, contributing to the Nature Recovery Network and climate change resilience.

4.9.4. Whilst Natural England are not the statutory consultee with regard to BNG, and as such will not make detailed comments on metric calculations and compliance, we would welcome further discussion with the Applicant regarding their approach to BNG delivery for this project and the opportunities is poses for enhancement.

5. Landscape

5.1. Nationally designated landscapes

5.1.1. The development site is within or may impact on the Suffolk and Essex Coast & Heaths National Landscape and the Broads National Park.

5.1.2. As outlined in paragraph 4.9.5. of the National Policy Statement for water resources infrastructure, National Landscapes (areas of outstanding natural beauty) and National Parks are highly protected.

5.1.3. Consideration should be given to the direct and indirect effects on this designated landscape and in particular the effect upon its purpose for designation. The management plan for the designated landscape may also have relevant information that should be considered in the EIA.

5.1.4. The development site is within the Suffolk Heritage Coast. The ES should set out the impacts on the Heritage Coast and opportunities for enhancement.

5.2. Landscape and visual impacts

5.2.1. Public bodies have a duty to seek to further the statutory purposes of designation in carrying out their functions (under section 245 of the Levelling Up and Regeneration Act 2023). This duty also applies to proposals outside the designated area but impacting on its natural beauty.

5.2.2. The environmental assessment should refer to the relevant National Character Areas. Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

5.2.3. The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA) in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

5.2.4. A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in Guidelines for Landscape and Visual Impact Assessment 2013 (3rd edition) produced by LI and IEMA. For National Parks and

AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

5.2.5. The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

5.2.6. To ensure high-quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the National Design Guide and National Model Design Code. The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

5.3. Heritage landscapes

5.3.1. The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest.

5.3.2. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

6. Connecting people with nature

6.1. The ES should consider the potential impacts on the King Charles III England Coast Path National Trail. The National Trails website www.nationaltrail.co.uk provides further information.

6.2. The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF sections N5 and TR8. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

6.3. Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

6.4. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

7. Soils and agricultural land quality

7.1. The Applicant has provided Natural England with an outline Agricultural Land Classification survey methodology, which we have reviewed and considered broadly appropriate.

7.2. It is Natural England's advice that an ALC survey should be undertaken across the full order limits at the pre-consent stage, to enable avoidance of BMV land through site design (i.e. micro siting) as far as reasonably practicable in line with paragraph 4.10.14 of the National Planning Statement for water resources infrastructure (Defra, July 2025), and to inform soil management, reinstatement and re-use.

7.3. Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England Guide to assessing development proposals on agricultural land.

7.4. The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

7.5. This will require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- The ALC survey should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

7.6. Further information is available in the Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites and The British Society of Soil Science Guidance Note Benefitting from Soil Management in Development and Construction

8. Air quality

8.1. Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg) [1].A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NOx and SO_2 against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

8.2. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk).

8.3. Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - http://www.scail.ceh.ac.uk/
- Ammonia assessment for agricultural development https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit
- Environment Agency Screening Tool for industrial emissions https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England http://www.airqualityengland.co.uk/laqm

8.4. Natural England has produced Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs), which can be found in Annex 1. The standard advice is Natural England's formal statutory advice and is a material consideration. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

9. Water quality

9.1. As detailed in paragraph 9.3.2. of the Scoping Report, Natural England have regular meetings with the Applicant, where we have been able to provide advice on the proposed development's assessment of water quality impacts. We will

[1] Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK

continue to work with the Applicant through our participation in the Environmental Stakeholder forum throughout the pre-application process. We offer our general advice on the assessment of water quality for NSIPs below:

9.2. NSIPs can occur in areas where strategic solutions are being determined for water pollution issues, and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

9.3. The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

10. Climate change

10.1. The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

10.2. Further information is available from the Committee on Climate Change's (CCC) Independent Assessment of UK Climate Risk, the National Adaptation Programme (NAP), the Climate Change Impacts Report Cards (biodiversity, infrastructure, water etc.) and the UKCP18 climate projections.

10.3. The Natural England and RSPB Climate Change Adaptation Manual (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's Nature Networks Evidence Handbook (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

10.4. The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's Carbon Storage and Sequestration by Habitat report (2021) and the British Ecological Society's nature-based solutions report (2021) provide further information.

11. Contribution to local environmental initiatives and priorities

11.1. The ES should consider the contribution the development could make to relevant local environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including, LNRS, landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

Annex 1 - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority. This standard advice may also be used for Hybrid Bills.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH3)
- nitrogen oxides (NO, NO2 or NOx)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO2)

Standing advice on air pollution and development is also available here: https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	**Step**		**Supplemental evidence/ basis for judgment**
Initial screening for credible risk of an effect	**1**	Check Distance criteria - could significant emissions reach a protected site? Yes = move to Step 2	The Air Pollution Information System (APIS) includes an introduction to air pollution.

		No = no further HRA required	APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
	2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/srcl Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads). If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	**3**	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing

		advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	(without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	**4a**	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the annual averages. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect alone irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC)	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or

		'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed them correctly, they will need to provide an in-combination assessment.	Critical Load), the emission is not likely to have a significant effect in-combination irrespective of background levels.
Detailed Assessment of ecological impacts	**5**	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment (AA) for habitats sites	**6**	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the

		mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process. Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals alone and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be **effective, reliable, timely, guaranteed** and of **sufficient duration**. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.
Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m
Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring[2] is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider

[2] "https://jncc.gov.uk/our-work/common-standards-monitoring/"Common Standards Monitoring | JNCC - Adviser to Government on Nature Conservation

information on:

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit:

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NOx – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years up to a certain date (2040 in the current version), reflecting that predictions and assumptions beyond then become less certain. Where EFT calculated emissions are to be used after this date to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2040 are used for HRAs– which would mean percentages of EVs are at predicted 2040 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH_3) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NOx in exhaust gases. Please note that the current EFT should be used and the noted date may change over time.

Motorways within the affected road network

Please note the following paragraph relates to NSIP proposals where air quality impacts are being considered as a result of increased traffic only. This approach is not appropriate for proposals that would alter the strategic road network.

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project

Norfolk County Council

Strategy and Transformation
County Hall
Martineau Lane
Norwich
NR1 2SG
NCC contact number: 0344 800 8020
Text relay no.: 18001 0344 800 8020

Via Email

Date: 1st October 2026

Dear Case Officer,

EIA Scoping Opinion: Suffolk Water Recycling Transfer and Storage (SWRTS)

Norfolk County Council (the County Council) welcomes the opportunity to provide comments on the above environmental impact assessment (EIA) scoping report. The comments below are made on a without prejudice basis and the County Council reserves the right to make further comments on the development consent order (DCO) application during consultation periods; and at the public examination stage.

The County Council have initial concerns they would expect to see addressed through the EIA:

Arboriculture and landscape
Early ground-based surveys are required to identify ancient and veteran trees, longstanding hedgerows and their habitat connectivity. The assessment should also address tree and hedge loss arising from construction access, maintenance access and visibility requirements, with avoidance and mitigation built into the design.

Ecology and biodiversity
Further baseline ecological information, surveys and biodiversity net gain (BNG) material are needed to inform route selection, scheme design and mitigation. Particular attention is required for designated sites, wintering birds, irreplaceable and priority habitats, watercourse crossings, and operational abstraction and discharge effects.

Highways and construction traffic
The final route, compounds and haul roads are not yet sufficiently defined. The application should include a transport assessment and outline construction traffic management plan addressing narrow rural roads, vehicle passing, road safety, severance, pedestrian effects, abnormal loads, emergency access and cumulative traffic with other nationally significant infrastructure projects (NSIPs).

Water environment and flood risk

The assessment should identify ordinary watercourses and historic flood records more clearly, review the proposed sensitivity and magnitude criteria, explain mitigation terminology and demonstrate that flood risk will not increase. A surface water drainage strategy and sufficient modelling should support the flood risk assessment.

Minerals and waste

Mineral safeguarding can be addressed through a standalone mineral resource assessment referenced in the planning statement. The proposed beneficial reuse of suitable excavated material is supported, subject to detailed assessment, further consultation and compliance with relevant legislation.

Public health

The Human Health assessment should include mental health and wellbeing as a distinct receptor, supported by a mental wellbeing impact assessment, to address cumulative effects from multiple NSIPs and construction-related stressors. The environmental statement (ES) should also provide a full operational noise assessment and robust controls for air quality, odour, construction disturbance and impacts on vulnerable communities.

1. **Arboriculture**

1.1. It is noted that ancient woodland and ancient and veteran trees are considered as major constraints in Appendix B of the scheme development summary and that a buffer of 25m is indicated to reduce the likelihood of damage to these irreplaceable habitats. This is considered an appropriate approach. However, it is also noted that in section 1.3.1 data has been collated as part of a desk top exercise. The proposed route crosses many field boundaries with associated hedge and tree features. It is likely that many of these boundary features have been in place for centuries and it is likely that some contain notable, veteran and ancient trees that do not currently appear on inventories of ancient and veteran trees. It is expected that at an early stage desk top surveys are replaced by ground surveys in line with BS 5837: Trees in Relation to Design, Demolition and Construction which will identify such irreplaceable habitats and enable the proposed buffering to be applied.

1.2. Many of the tree and hedge features will also play an important role in connecting other areas of woodland and habitat.

1.3. Early consideration must be given to access requirements to construct and maintain the scheme and the impact that this may have on trees and hedges. Removal of trees and hedges to provide adequate clearance for vehicles and visibility at junctions / accesses must be included in the assessment and for any unavoidable impacts suitable mitigation proposed.

2. **Ecology**

2.1. The scope of the assessment for terrestrial biodiversity is outlined in chapter 6 of the report. The assessment for freshwater and marine biodiversity is outlined in chapters 7 and 8.

2.2. The assessment of the significant effects from the project will be presented in the ES submitted with the application for a DCO.

2.3. The following documents are to be submitted as part of the DCO application:

- EIA Scoping Report
- Environmental Statement
- Habitats Regulations Assessment
- Draft European protected species (EPS) licences
- Water Framework Directive compliance assessment
- BNG implementation plan for the proposed development

2.4. This baseline information is required to inform the scheme design, mitigation and considerations of any alternatives.

2.5. All surveys should be undertaken by an appropriately qualified and experienced ecologist, that meets the relevant British Standard (BS42020:2013 Biodiversity – Code of practice for planning and development) and complies with industry best practice (e.g. CIEEM technical standards).

2.6. At this early stage, in the absence of Preliminary Environmental information including Ecological Appraisals, Ecological Surveys, and Biodiversity Net Gain information (including metrics), it is not possible for the Council to meaningfully provide comments or advice to avoid, mitigate or compensate for ecological impacts and to maximise opportunities to deliver Biodiversity Net Gain. Options are still being explored for the optimal pipeline route and the location of some of the permanent features. Detailed drawings and plans will be required once a route has been confirmed.

2.7. The national planning policy framework (NPPF) will form material considerations, in addition to Natural England guidance and relevant legislation. A hierarchical approach to mitigation will be adopted through the design process which is supported. This will seek to avoid direct impacts to irreplaceable and priority habitats e.g. ancient woodland and ancient/veteran trees.

2.8. The scoping report includes the following secondary mitigation:

- Outline construction environmental management plan (OCEMP)
- Outline landscape and environmental management plan (OLEMP)
- Outline decommissioning environmental management plan (ODEMP)

2.9. Essex and Suffolk Water are encouraged to provide relevant information at the earliest possible stage prior to submission of the DCO application. Watercourse crossing methodologies and operational effects associated with abstraction and discharge activities will be assessed within the ES.

2.10. Some of the options for the pipeline route and permanent features pass within 5m of the zone of influence (ZoI) of international and nationally important sites designated for wintering bird species and assemblages. Wintering bird surveys have been commissioned and will be completed between October – December 2025 and January – March 2026. The results of these surveys have yet to be provided and should inform scheme design and proposed mitigation.

3. **Highways**

3.1. The EIA scoping report states that the precise alignment of the project, location of construction compounds and the haul roads are not yet known and are still under development. Accordingly, there is insufficient detail at present to enable the local highway authority to provide a full assessment of the project and the highway comments below are therefore of a general nature.

3.2. Works within Norfolk are identified as the proposed advanced water recycling plant (AWRP) options which are accessed from National Highway network (A47), Proposed long sea outfall (LSO) option 1, which could be in Hopton-on-Sea and around Gorleston Golf Club and Proposed Advanced Water Recycling Plant (AWRP) to River Waveney pipeline, located on sheets 3 and 4 within Figure 1-3.

3.3. NCC would ask that specific regard be given to the Norwich to Tilbury and East Pye Solar NSIPs, subject to approval, which will have infrastructure and accumulated traffic in and around the SWRTS site.

3.4. As part of our initial discussion with the applicant, the Highway Authority have asked that the formal DCO application be accompanied by a transport assessment (TA) and an outline construction traffic management plan (OCTMP). It is noted that the volume of construction traffic is not yet known, but that a commitment is provided within the EIA scoping report to provide a TA and OCTMP. The TA needs to assess the effects of the anticipated traffic upon driver delay; severance; pedestrian delay; pedestrian amenity; accidents; road safety; and impact from abnormal indivisible loads (AILs).

3.5. It is noted that the traffic and transport effects during operation (including maintenance) are out of scope and NCC is happy to agree on that point.

3.6. As a general point, the overall thrust of the EIA scope relates to examining increases in traffic volumes (represented as a percentage figure) and NCC wish to point out that the public highways leading to the overhead cable corridor in Norfolk are predominantly narrow minor rural lanes. Accordingly, even a small volume of traffic on these routes can have a significant impact if vehicles are unable to physically pass each other and this point needs to be considered within the CTMP.

3.7. The ES will need to consider emergency access (to blue light services) associated with any temporary road closures; and/or temporary roadworks.

4. **Water Environment**

4.1. Proposed AWRP - In section 9.4.38 to 9.4.41, NCC notes a description is provided for the surface water flooding extents. However, it is noted that some of the surface water flowpaths appear to align with ordinary watercourses such as the upstream extent of Fritton Lake (potentially referred to in the report as 'Hopton Run'). This is not considered in the report even though the waterbody is identified in section 9.4.7 for surface water receptors. NCC also reviewed the relevant watercourse and flood risk figures and notes the naming of these watercourses is included on the mapping to support the readers understanding of the information in the text. Going forward, please can this be addressed to improve comprehension. Further work and information is required.

4.2. Proposed AWRP to River Waveney Pipeline - In section 9.4.174 to 9.4.176 there is no consideration or identification of ordinary watercourses. Further consideration is required.

4.3. In relation to the historic flood risk, NCC notes that the flood incident reports have not been identified as a source of information in the scoping report. NCC recommends that these records of historic flood events, that are freely available on the NCC Flood and Water webpage, are reviewed and the information is included in the report. Further work and information is required.

4.4. NCC supports the scoping in of the water environment for the environmental statement.

4.5. In section 9.7.1 to 9.7.2, it is not clear to the reader what the difference is between the primary and secondary mitigation. This leads to a lack of clarity about why surface water runoff from the operational is included as a primary mitigation in Table 9-31 and the surface water runoff mitigation for the construction phase is considered a secondary mitigation in Table 9-32. Further clarification is required.

4.6. NCC notes that the NPPF is clear that there should be no increase in flood risk throughout the lifetime of the proposed scheme. Further work and information is required.

4.7. NCC queries whether by 'exorable' mitigation measures the applicant means residual risks. NCC suggests that the applicant reconsiders some of the terminology as it does not reflect the terminology applied in industry best practises at present and makes it difficult to understand in places. Further consideration on the language and terminology would be appropriate.

4.8. The sensitivity of water environment receptors criteria for flood risk is not fully applicable as the criteria is based upon the application of the vulnerability classification of wider types of development rather than the elements specific to this type of development. This means that while the development offsite might be able to be considered within this framework, the types of development within the construction phase of the development on site would be more difficult to consider in terms of vulnerability classification. This approach also does not consider the impact of flood risk on sensitive environmental sites that also would not be considered in this approach. Further review of the sensitivity criteria is required.

4.9. In relation to the criteria for the magnitude, it is not clear whether the measurements are applicable as it is not clear whether surface water modelling will be undertaken for all the areas onsite and elsewhere for all sources of flood risk to enable this criteria to be applied. There should be a consideration on how the assessment in the increase in flood risk particularly in relation to surface water flood risk will be applied. Further work and information is required.

4.10. In relation to the flood risk assessment, it is not clear from the information provided whether a surface water drainage strategy will be prepared to support the FRA. The drainage strategy is required as it will provide the evidence to demonstrate any increase in flood risk from surface water is managed and mitigated appropriately. Further work is required.

5. Minerals and Waste

5.1. The adopted Norfolk Mineral and Waste Local Plan (NM&WLP) (May 2025) defines safeguarding areas and consultation areas for mineral resources, specific mineral extraction site allocations, and existing mineral sites and waste management facilities. This in in accordance with national policy and

guidance. NM&WLP Policy MP11 safeguards mineral resources, allocations and existing sites, and Policy WP17 safeguards existing waste management operations over 20,000 tonnes per annum.

5.2. NCC note and agree with the text within section 21.3 relating to discussions between the SWRTS proposer and Norfolk County Council, in its capacity as the mineral and waste planning authority (MWPA) for Norfolk. Specifically, the MWPA agrees that in the case of this project scoping minerals out of the Environment Statement then it is appropriate and proportionate for the mineral safeguarding issues to be dealt with using a standalone mineral resource assessment referenced through the Planning Statement.

5.3. The County Council notes that among the potential secondary mitigation measures that may be implemented is: 'Maximising the beneficial reuse of suitable excavated arisings and incidentally extracted minerals within the Proposed Development, subject to geotechnical suitability, environmental acceptability and compliance with applicable waste legislation.'

5.4. The County Council considers that, subject to further consultation and detailed assessment at the application stage, a mineral resource assessment to support any future Planning Statement and appropriate mitigation are likely to appropriately address mineral resource safeguarding issues. The scoping report contains a sufficient level of detail at this stage.

6. **Public Health**

Human Health

6.1. Inclusion of a comprehensive human health section in the Environmental Statement will help to ensure health and well-being impacts are assessed, health inequalities considered, and opportunities to support healthier communities are identified and maximised in each phase of the development.

6.2. NCC notes the inclusion of a Human Health section in the EIA Scoping Report –Volume I: Main Report (Section 18, pp. 810–928).

Proposed Addition to Scope: Mental Health and Well-being Receptor

6.3. NCC notes that the Applicant has scoped in 'Community identity, culture, resilience and influence' and 'Social participation' (pages 912–913), explicitly acknowledging that the "real and perceived impact on community cohesion and wellbeing from cumulative impact with NSIPs in Suffolk and Norfolk" will result in a significant effect.

6.4. However, the Scoping Report treats these impacts purely as social issues to be managed via a Stakeholder Communications Plan and an Engagement Strategy. The cumulative psychological burden of multiple regional NSIPs, combined with the project's scoped-in physical stressors, such as noise and vibration, air quality, and relocation, presents a clear, direct pathway for chronic clinical anxiety, stress, and sleep disturbance.

6.5. Therefore, in line with the principle of "parity of esteem" which states that mental health must be given equal priority to physical health (as enshrined in the Health and Social Care Act 2012), we request that the Planning Inspectorate directs the Applicant to introduce mental health and well-being as a distinct, dedicated receptor within the human health section. Mitigation must focus on the completion of a comprehensive mental wellbeing impact assessment (MWIA). Subject to the inclusion of this receptor, NCC is otherwise content with the health-related parameters proposed.

6.6. Additionally, we highlight that the Planning Inspectorate previously advised "...that effects on mental health arising from the cumulation of major projects in the study area should be assessed and reported in the ES where significant effects are likely" (page 32 of the Scoping Opinion for the proposed LionLink Multi-purpose Interconnector). This serves as a direct regulatory precedent for this NSIP.

Air Quality and Odor

6.7. Construction activity can cause disturbance and stress which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements, and pollution. Air pollution is a significant public health issue, particularly affecting vulnerable groups such as older people and those with existing health conditions. Poor air quality is linked to a range of adverse health effects, including respiratory and cardiovascular disease, reduced lung function, and asthma attacks.

6.8. According to OHID Fingertips data, Great Yarmouth and South Norfolk districts already have a 5.2% estimated fraction of mortality attributable to particulate air pollution; construction activities risk increasing this burden. Furthermore, Norfolk Insight demographics show that Great Yarmouth has 25.2% of its population aged over 65, and South Norfolk has 25% - this is much larger than the England average of 19.1%. Older people are disproportionately affected by air pollution, with spikes in particulate matter directly associated with increased strokes and hospitalisation rates (according to Urban Health data).

6.9. NCC notes that construction will impact Norfolk via the construction of the pipeline and the Advanced Water Recycling Plant in Hopton-on-Sea.

6.10. NCC notes the inclusion of an air quality and odour section in the EIA Scoping Report – Volume I: Main Report (Section 15, pp. 672–726).

6.11. It is noted that sensitive human and ecological receptors have been labelled as experiencing a significant effect from construction dust, PM10, and PM2.5 at the scoping and decommissioning phases. It is noted that mitigation measures are described in the IAQM Construction Dust Guidance.

6.12. Subject to our overarching request to include a dedicated mental health receptor to capture the psychological impacts of these disturbances, NCC is content with the specific air quality receptors that have been scoped in and out.

Noise and Vibration

6.13. Reducing noise pollution helps improve the quality of urban life, specifically in relation to sleep quality and mental health.

6.14. NCC notes the inclusion of a Noise and Vibration section in the EIA Scoping Report – Volume I: Main Report (Section 14, pp. 638–671).

6.15. NCC notes that there is likely to be a significant effect on receptors during the construction and decommissioning phases of the pipeline and recycling plant, and that a CEMP and best practice measures will be used to mitigate these effects.

6.16. It is noted that receptors will be significantly impacted during the recycling plant's operational phase and that mitigation measures will help ameliorate this. However, to ensure that operational noise effects are sufficiently mitigated for nearby residents, a full operational noise assessment must be included in the ES.

6.17. Subject to this operational assessment and our overarching request for a standalone mental health receptor, NCC is content with the noise receptors that have been scoped in and out.

7. Historic Environment

7.1. NCC concur with the EIA Scoping Report that below-ground archaeology should be scoped in.

Rishabh Rai

From: BeforeYouDig <BeforeYouDig@northerngas.co.uk>
Sent: 04 September 2026 07:35
To: Suffolk WRTS
Subject: RE: EXT:WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from beforeyoudig@northerngas.co.uk. Learn why this is important

Good morning

Northern Gas Networks do not cover this area.

Please use this online tool to find out which gas distribution network you need to contact:

https://www.energynetworks.org/operating-the-networks/whos-my-network-operator

Kind regards,

[redacted]

Administration Assistant
Before You Dig
Northern Gas Networks
1st Floor, 1 Emperor Way
Doxford Park
Sunderland
SR3 3XR

Before You Dig: 0800 040 7766 (option 3)
www.northerngasnetworks.co.uk
facebook.com/northerngasnetworks
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Alternative contact:
beforeyoudig@northerngas.co.uk



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By email only: suffolkwrts@planninginspectorate.gov.uk
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Our reference LAGA/PGM_LITIGATION/O170495545.1/CHSI

Your reference WA0210003

21 September 2026

Dear Sir/Madam

Suffolk Water Recycling, Transfer and Storage Project — Response to Scoping and Regulation 11 Notification Consultation on behalf of Playters Solar Limited

We act on behalf of Playters Solar Limited (company number: 08711340) a company within the Foresight Group, in response to the scoping and Regulation 11 notification consultation letter issued in connection with the Suffolk Water Recycling, Transfer and Storage Project (the "**Project**") (the "**Consultation Letter**"). We note that comments are required by 30 September 2026.

We are instructed to respond to this consultation to ensure that the concerns of our client, as an affected landowner and operator of an existing and operational solar farm, are captured in the Environmental Statement ("**ES**") that will be prepared in support of the Development Consent Order ("**DCO**") application for the Project.

Our Client

Our client is the leaseholder and operator of Playters Solar Farm, Playters New Farm, Church Road, Ellough, Beccles, Suffolk (the "**Solar Farm**"). Our client holds a leasehold interest in the land and operates an existing solar photovoltaic ("PV") generating facility on the site, with significant apparatus, infrastructure and solar modules in situ.

The Project and Its Interaction with Playters Solar Farm

We understand that Option 4 for the pipeline from the Advanced Water Recycling Plant to River Waveney (A-W) Pipeline Corridor passes through the Solar Farm, and that Option 4B also passes in close proximity to it. We further understand that, at present, the options affecting Playters Solar Farm

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(A-W4) do not appear to be among the preferred options and that, on page 37 of the published presentation, A-W4 appears to be listed under "Options not being progressed". The same has been confirmed via letter on 26 August 2026, however whilst not a *'preferred'* option, we are aware that the Applicant can only confirm that they *'do not anticipate'* requiring our client's land and there does, nevertheless, remain a risk and potential for this route to be pursued.

Notwithstanding the current preference for an alternative route, if Option 4 were to be selected as the preferred or consented route, it would or may require solar modules to the south of the Solar Farm to be removed for the works. Our client's position is therefore that the Project carries a real and identifiable risk to its operations, apparatus, land interests and future generation capacity that must be properly assessed in the ES.

Scoping Request

The purpose of this representation is not to object to the Project at this stage, nor to argue for specific protective provisions. Rather, our client seeks to ensure that, if Option 4 (or Option 4B) is selected or remains a live option at any point during the application process, the ES addresses the specific impacts on the Solar Farm in appropriate detail, and the applicant takes this early opportunity to engage with our client, particularly in relation to the potential impact on its Solar Farm. Failure to scope in these matters at this stage may leave the impacts on our client's apparatus and operations inadequately assessed and the Solar Farm in a significantly weaker position later in the examination process.

Accordingly, our client respectfully requests that the ES and the scoping process, together with optioneering, addresses the following matters;

1. **Identification of Playters Solar Farm as an affected asset** —identify Playters Solar Farm as an existing operational energy generating facility and our client as an affected landowner/operator in the event that Option 4 or Option 4B is pursued.

2. **Assessment of impacts on apparatus and operations** —include a specific and detailed assessment of the effects of Option 4 (and Option 4B) on our client's existing apparatus, solar modules, electrical infrastructure, grid connection, and operational activities, including during the construction, operational and decommissioning phases of the Project.

3. **Assessment of loss or disruption to generation capacity** —assess any potential loss of, or disruption to, our client's existing and future generation capacity that would result from the selection of Option 4 or Option 4B, including any permanent or temporary loss of solar modules and associated infrastructure.

4. **Comparative assessment of alternative routes** — include a robust assessment of the alternative pipeline routes (including Options 1, 2, 3 and 4B) having regard to their respective impacts on existing energy infrastructure and operational solar farms, and should not treat the current preference for Option 3 as precluding proper comparative assessment of all routes, including Option 4.

5. **Our client's land interests** — identify and assess the implications of the proposed works for all of the land within our client's lease, including the need for any temporary or permanent rights over our client's demise and the consequential impact on our client's lease arrangements.

6. **Consideration of our client as an affected party** —treat our client as an affected party with a direct interest in the Project for the purposes of all ongoing consultation, engagement and examination processes, and our client should be engaged directly and substantively in relation to any matters relevant to its operations or land interests.

Reservation of Position

This letter should not be construed as consent to, or acceptance of, any of the routes proposed under the Project, including Option 4 or Option 4B, insofar as they affect our client's land or apparatus. Our client reserves its position in full in respect of all matters relating to the Project and its potential impact on the Solar Farm. Our client's concerns about the Project remain live notwithstanding that Option 4 does not, at present, appear to be the preferred route, and our client will wish to engage further as the application progresses.

Our client remains willing to engage constructively with the Project applicant on all matters relating to the Solar Farm, and we would welcome direct correspondence from the applicant's team in that regard. Please note that Osborne Clarke LLP is instructed to act on our client's behalf in connection with this Project, and all future correspondence concerning our client's interests should be directed to us at the contact details below.

We would be grateful if you would:

(a) record this letter as a response to the scoping and Regulation 11 notification consultation on behalf of our client; and

(b) ensure that the matters identified above are reflected in the scoping opinion and in the Environmental Statement to be prepared in support of the DCO application.

Yours sincerely

[redacted]

Associate
for Osborne Clarke LLP
T +44 [redacted]
E [redacted]@osborneclarke.com

Rishabh Rai

From: [redacted]@drax.com>
Sent: 09 September 2026 10:42
To: Suffolk WRTS
Cc: [redacted]
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

You don't often get email from [redacted]

Dear Rishabh,

Thank you for consulting Drax in relation to the proposed Suffolk Water Recycling Transfer and Storage project.
Having reviewed the information provided, Drax has no comments to make regarding the scope and content of the Environmental Statement and has no observations to submit in response to this scoping consultation.
Please record this response as confirmation that Drax has no comments on the proposed development at this stage.
Kind regards,

[redacted]
Head of Property

3rd Floor, Alder Castle,
10 Noble Street,
London
EC2V 7JX

[redacted]@drax.com
M: +44 (0) [redacted]



From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 03 September 2026 20:19
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Dear Sir/Madam

Please see attached correspondence on the proposed **Suffolk Water Recycling Transfer and Storage**.

The Applicant for the Proposed Development intends to make an application for Development Consent under the Planning Act 2008. The Applicant has sought a Scoping Opinion from the Planning Inspectorate, on behalf

Proposed DCO Application by Essex and Suffolk Water Limited for Suffolk Water Recycling Transfer and Storage

Royal Mail response to EIA Scoping Consultation

Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.

Royal Mail and its advisor Strutt & Parker have reviewed the EIA Scoping Report dated August 2026. There are several operational Royal Mail properties within c.10km of the proposed scheme. The construction of this infrastructure proposal has been identified as having potential to impact on Royal Mail operational interests, particularly given the impact the proposed development could have on the Strategic Road Network within central London. However, at this point in time, Royal Mail is unable to provide a consultation response due to insufficient information being available to adequately assess the level of risk to its operation and the available mitigations for any risk. Consequently, Royal Mail wishes to reserve its position to submit a consultation response/s at a later stage in the consenting process and to give evidence at any future Public Examination, if required.

In the meantime, any further consultation information on this infrastructure proposal and any questions of Royal Mail should be sent to:

[redacted]**royalmail.com), Senior Legal Advisor Property, Royal Mail Group Limited**

[redacted]**@struttandparker.com), Strutt & Parker.**

Please can you confirm receipt of this holding statement by Royal Mail.

End

Saxmundham Town Council

Essex and Suffolk Water Scoping Consultation

Suffolk Water Recycling, Transfer & Storage Project

As a 'consultation body', Saxmundham Town Council's response relates to the proposed pipeline work within our community. We have identified areas of concern in the proposed Central Service Reservoir to Saxmundham Water Tower pipeline that crosses under the A12 and enters Saxmundham from the south-west. A further pipeline is proposed from near the Saxmundham Water Tower to Sizewell C. Where the construction effects of the two pipeline sections interact locally, the Council has considered those implications together.

Construction Stage - Traffic, Transport and Construction Site Traffic

The ambulance, fire and police stations are all situated on Seaman Avenue. In addition, there is an early years nursery, and a new SEND school is scheduled for the former High School site. Given the concentration of emergency services and educational uses on Seaman Avenue, and the identification of Seaman Avenue and the B1119 within the proposed construction traffic network, the Council considers that the EIA should assess the potential effects of construction traffic and traffic management on emergency access, school access and the operation of the Seaman Avenue/B1119 junction. This is reinforced by the potential cumulative effects of traffic generated by multiple Nationally Significant Infrastructure Projects.

Construction Stage - Cumulative Impacts Traffic

Cumulative traffic impacts related to Sizewell C, the proposed National Grid Electricity Transmission Sea Link and National Grid Ventures' LionLink project, ScottishPower Renewables' Friston substation and the proposed Garden Neighbourhood housing and commercial development should all be considered. The Council requests that these projects are expressly included within the cumulative effects assessment insofar as their construction periods and traffic routes overlap.

Construction Stage - Ecology

Whilst there are no recognised nature conservation sites in Saxmundham, the Council is concerned that its Wildlife Walk, located adjacent to the Seaman Avenue play area, could be detrimentally affected by construction. This has only been established for some three years and is a haven for insects and other wildlife. Moreover, the scrub area adjacent to the Water Tower provides locally valuable green-corridor habitat for flora and fauna. The Council requests that these areas are included within the ecological assessment, with appropriate surveys, including bats, birds, reptiles, insects and flora, undertaken as part of the EIA, and that appropriate mitigation, reinstatement and, where necessary, compensation measures are identified for any effects on the Wildlife Walk or adjacent scrub habitat.

Our Environmental Team has undertaken extensive ecological improvement works on the Memorial Field. Similarly, the Council requests that an ecological survey of the Memorial Field is undertaken and

that any likely construction effects, mitigation and reinstatement requirements are assessed within the EIA.

Construction Stage - Loss of Amenity

We understand that green/open space and recreational facilities are scoped in (Table 18-22). The risk of severance is noted as moderate, 'particularly during construction'. The Seaman Avenue playpark and Memorial Field Skatepark are vital for the well-being of our young people. Moreover, the Memorial Field hosts the Youth Booth and Scout Hut; both are essential for the young people of the town. At the B1119 end of the Memorial Field is the Memorial Garden, which is used regularly for reflection. Additionally, the Memorial Field hosts various events during the year, including the three-day Sax Fest and the early autumn travelling fair. The Council therefore considers that the sensitivity of green/open space and recreational facilities should be increased from Medium to High to reflect the importance of this location. The EIA should assess loss of use, temporary severance and reinstatement requirements, with appropriate mitigation and compensation measures identified where significant effects are predicted.[1]

Construction Stage - Noise, Light, Dust Pollution

We note that Essex and Suffolk Water has identified noise as scoped in and classed as high sensitivity. Although the Scoping Report records overall air-quality sensitivity as Low, it acknowledges that localised impacts may occur. Given the proximity of residential properties, community facilities and educational uses, the Council considers that construction dust, lighting and localised air-quality effects should be specifically assessed within the EIA. The proposed SEND provision at the former High School site in Seaman Avenue should also be included as a sensitive receptor and taken into account when determining the sensitivity of community and education facilities. The Council therefore requests that the Medium sensitivity rating for Community and Education facilities is reconsidered in light of the presence of vulnerable users who may be particularly sensitive to noise, disruption to access and changes in air quality.[2]

Construction Stage – Socio-economic Impacts

Table 17-18 identifies 34 businesses within a 500m radius of the proposed CSR to Saxmundham Pipeline section of the EIA Scoping Area. The Council has identified additional organisations and community facilities which do not appear to be separately identified within Table 17-18, including:

- The Youth Booth – located on the Memorial Field
- The Scout Hut – located on the Memorial Field
- The Police Station – Seaman Avenue
- Ensors Accountants – junction of Seaman Avenue and Rendham Road

The Council requests that the baseline is checked to ensure that all relevant businesses, services and community organisations within the 500-metre study area are captured.

[1] *EIA Scoping Report – Volume 1, Main Report,* Suffolk Water Recycling Transfer and Storage, August 2026.
[2] *EIA Scoping Report – Volume 1, Main Report,* Suffolk Water Recycling Transfer and Storage, August 2026.

The Council is also concerned that the fixed 500-metre business study area may not capture the wider economic effects of construction-related traffic disruption on the High Street and Railway Station. Although the proposed works do not appear to directly affect the B1119/Rendham Road route through Saxmundham towards Leiston, traffic management at the Seaman Avenue/B1119 junction could delay access to the town centre. In combination with traffic generated by other NSIPs and the South Saxmundham Garden Neighbourhood development, this could result in further congestion and deter some visitors from using town-centre shops, services and entertainment. The Council therefore requests that the socio-economic assessment considers whether the zone of economic influence should extend beyond the fixed 500-metre radius to include the High Street and Railway Station.

Suffolk Water Recycling Transfer and Storage

WA0210003
SuffolkWRTS@planninginspectorate.gov.uk

CENTRAL SERVICE RESERVOIR

SIBTON PARISH COUNCIL

Re: EA Comment

We have concerns due to local experience, with the potential effect that the overflow outlet may cause.
The proposed watercourse to which it is directed, currently often struggles to cope with heavy rain fall, causing flooding on the road adjacent to West Cottage, Sibton Green and an area of the field that the overflow pipe crosses. Work would be likely required to clear this watercourse to avoid such issues if significant overflow volume is contemplated.

Light pollution during the construction phase, particularly during the autumn and winter months is also of concern. Professional lighting design needs to be considered to avoid excess and unnecessary light spill. This is a dark sky area. Not only for residents but also to prevent wildlife disturbance.
Site lighting to be as low level as possible.

South Norfolk Council
Horizon Centre
Broadland Business Park
NR7 OWF

The Planning Inspectorate
The Square,
Temple Square House,
Temple Quay
Bristol BS1 6PN

Date: 01 October 2026

Dear Sir/Madam.

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Application by Essex and Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)

Scoping Consultation

Thank you for your consultation dated 9th September 2026. We have reviewed the documents submitted and would like to make the following comments. The technical officer-level comments are made without prejudice basis and South Norfolk District Council as a host Local Authority reserves the right to make further comments during the Development Consent Order process.

South Norfolk District Council considers in general that the Scope of the documents are sufficient to meet the requirements of the assessment of the project from our areas of expertise. However, having regard to the documents submitted we would comment as follows, these comments follow on from our response to the applicant's non-statutory consultation:

Landscape and Visual

A full Landscape and Visual Impact Assessment should be undertaken, and this should consider all potential impacts, both during construction and in operation, and the cumulative impacts with other TCPA and NSIPs where appropriate. The Council also advise using the recently adopted Landscape Susceptibility SPD, although relevant to renewable energy projects, this provides further insight and clarification on the Landscape Character Areas.

Specific comments:

Arboriculture

- As existing trees and hedgerows are an undisputed feature of the sites and receiving landscape it is expected that tree surveys will be available to inform the scheme's detail design and be part of the submission for examination. From experience of previous NSIPs we do not consider that this can be left until final design stages. Without detailed surveys of (at least) the potentially affected areas, it is difficult to ascertain the implications of the proposal.
- Furthermore, the Scoping refers to the Hedgerows Regulations in Paragraph 10.6.2 and from experience with recent NSIPs, the Council would expect to have full details of hedgerow

removal necessary for temporary construction works and required for any permanent accesses for maintenance to fully understand the extent of hedgerow losses proposed.

Ecology and Biodiversity

Ecological surveys are being undertaken between 2025 and 2027. Construction work is expected to start in 2030 with operation from 2033. The application is expected to be submitted to PINS in spring 2028.

The EIA will consider terrestrial ecological impacts associated with construction, operation, and decommissioning, and will and consider negative as well as beneficial effects. The Council notes the EIA will consider the ecological mitigation hierarchy and that the proposal will be subject to statutory BNG as it will be submitted after 2nd November 2026.

SNDC broadly agree with the matters scoped into the terrestrial ecology chapter (summarised in Table 6-9 of the EIA Scoping Report) although we request that consideration also be given to the inclusion of:

- Habitats of 'less than local' importance due to the scale of the proposal as there is also potential for significant benefits to habitats of 'less than local' importance, such as modified grassland;
- Beavers, as there is a report of a beaver on the River Waveney;
- Fragmentation (barrier to movement) caused by protective fencing and security barriers; and
- Tree loss (not just impacts to ancient woodland, veteran trees, and TPO trees)

We defer to colleagues in the Environment Agency, Norfolk Rivers Trust, and Natural England regarding freshwater ecology. SNDC suggest that Norfolk Wildlife Trust should also be included in discussions with the applicant given the proximity of the scheme to County Wildlife Sites.

When considering impacts, consideration should also be given to the potential presence of unidentified ancient woodland, and habitats of CWS/RNR quality within/adjacent to the order limits, so that they can be avoided. Similarly, SNDC request that all notable trees are afforded the same protection as ancient/veteran trees.

Specific comments:

Ecological Surveys

- SNDC requests that ecological surveys (e.g. badgers) are carried out in the optimal period to minimise the likelihood of evidence being missed. The bat surveys need to identify important commuting routes/foraging areas in order to provide suitable mitigation. Habitat surveys should be undertaken by ecologist with at least FISC Level 3 (or equivalent). Where third-party land is not accessed, maps should be included showing the extent of un-surveyed land.

County Wildlife Sites

- SNDC request that the CWS/RNR citations be included within the ES and their reasons for designation considered as part of the impact assessment i.e. the order limits partially incorporate Meadows at Boon's Plantation CWS (2181), hydrologically linking the two.
- The CWS/RNR database is updated annually with the 2026 updated being available in due course. Updates should be considered when available.

Mitigation

- When considering impacts SNDC request that 'ecological buffers' are included as embedded mitigation e.g. CWS should have at least a 15 m buffer to avoid direct impacts.
- SNDC also request that all notable trees are afforded the same level of protection as veteran/ancient trees as these will become the veteran/ancient trees of the future.

- SNDC requests that the applicants approach Natural England's DLL Norfolk & Suffolk Steering Group if DLL is likely to be used to ensure they can provide sufficient compensatory ponds.

Biodiversity Net Gain (BNG)

- The scheme will be subject to statutory BNG and will need to adhere to Published guidance including ('Biodiversity gain statements for nationally significant infrastructure projects' and 'NSIP: biodiversity gain statement for water resources'.
- SNDC request that the metric is submitted as an Excel document alongside the Excel version of the condition assessments. Ideally the UK Habs data (and tree data) should be available as a .shp file
- If irreplaceable habitat is impacted, bespoke compensation must be provided.
- While there are no restrictions on where BNG can be delivered for NSIPs consideration should also be given to the biodiversity net gain hierarchy. SNDC request that BNG is provided as close to the Order Limits as possible.

Cultural Heritage

The EIA should include a Heritage Impact Assessment. The Council will also expect non-designated heritage assets to be identified that will likely be affected and whilst any assessment needs to be proportionate to their significance, the degree of impact should not be considered to be less simply because of the generally lower level of significance of non-designated heritage assets compared to designated heritage assets; the level of impact needs to be judged on how it may impact on the characteristics of each particular asset.

Specific comments:

- SNDC are concerned that in Paragraph 11.3.1, we are excluded as a consultee with responsibilities relating to the historic environment. SNDC have a Senior Heritage and Design Officer who is involved with the multiple NSIPs hosted in the district, and has been involved with this project to date, and the Council would expect ongoing engagement throughout the EIA and DCO process.

- It is important to consider impact from permanent access roads (for example disrupting historic field patterns and access) as well as the fields which will be temporarily disrupted through the construction phase where hedgerows can be replanted.

- SNDC have no further comments to make with regard to the historic environment and defer to Norfolk County Council in their capacity as the Historic Environment Service with regard to Archaeology.

Environmental Impacts

SNDC have concerns regarding the potential environmental impacts of the proposal and the matters proposed to be scoped-in and scoped-out. The Council have listed below details of topic areas that require further evidence for assessment and should therefore be scoped into the EIA.

Specific comments:

Contamination

Paragraph 2.5.1, relating to the operational phase of the proposed AWRP, states that the membrane filtration process will remove residual chemicals including PFOA and PFOS. The Council request the below information is provided regarding this, including:

- The efficiency of chemical removal;

- The specification of the equipment to be used;
- Details of all other PFAS species which the membrane filtration will remove along with the effectiveness of the process- does the process work on the short chain PFAS such a Trifluoracetic Acid and if so, how effective in the removal; and
- What will happen to the contaminated filtration system/media? Will this be recycled/destroyed, and if so, how?

Paragraph 2.5.3 states that 1.1Ml/d is proposed to be transferred to the River Waveney and the Council request the below information is provided regarding this, including:

- What testing will be undertaken on the water to ensure that the water will not be detrimental to the environment and human health of the people who use the river;
- Has any testing of the river been undertaken and if so, what analytes have been tested for; and
- What contaminant levels has any chemical analysis been compared to? Is this for human, water, or ecological health?

In Paragraph 2.5.4, the report states that 5Ml/d will be discharged into the North Sea from the LSO but no information has been provided regarding the contaminant load of this emission and what the potential impact will be on the maritime environment, including swimmers, other water users, fish and shellfish (including any potential effect of the bioaccumulation of toxins within the fish/shellfish which could prevent them being consumed and the potential impact on the fishing businesses).

Beyond what has been provided in the scoping report justification should be given to the reason for using the indirect method instead of the direct method for water transfer. The report states that the following the treatment the water will be suitable to return to the environment, but no evidence of this has been provided. If the water has passed through cleaning processes, there is no justification for this to be deposited into the River Waveney for re-abstraction at Barsham and instead, a HDD pipeline under the river would be more effective.

Noise and Vibration

- Operational noise and vibration from the pipelines have been scoped out of the assessment as it has been assumed that they will not generate any noise or vibration. However, there is the possibility of the pipes generating noise and vibration just as house pipes can generate noise. As such this must be considered and mitigation measures proposed should this occur due to a quirk of construction.
- Vibration levels chosen in Table 14.2 are for preventing damage to buildings and does not include the potential for nuisance. This is considered in table 15.4. As these levels are significantly lower than those for the protection of buildings, these should be adopted as the vibration limit values as they will be protective of amenity as well as buildings.
- NVSRs and pumps. These should be screened in as the specification of the pumps is unknown at this time and while there may be little chance of vibration impact if the proposed mitigation is employed, the impact on the NVSRs from noise could be a significant issue with impact on amenity.
- With the exception of the above, it is agreed that the matters scoped in are acceptable.

Air Quality

- Odour from the operational plant should not be screened out and should be modelled which should be supported by empirical evidence gathered at the other existing AWRP site in Longford. Regard should also be given to odour complaints that the local authority or Environment Agency have received regarding the other plant at Longford.
- With the exception of the above, it is agreed that the matters scoped in are acceptable.

Health

- The potential impact of odour from the AWRP should be scoped in as this will have deleterious impact on the amenity of the residents and if prolonged or excessive their mental health.
- SNDC defer to Norfolk County Council with regard to Health and Wellbeing considerations.

Ground Conditions

- Ground gas has not been mentioned and should be scoped in particularly as the scoping assessment has identified landfills backfilled pits and peat deposits. It is agreed that the matters scoped in are acceptable.

Lighting

- Site lighting is only mentioned in passing in Paragraph 2.5.8. While it is not specifically necessary to scope lighting into the assessment, it should be considered at an early stage to prevent nuisance and impacts on ecology. Details and specification of all lighting should be provided with the application.

Cumulative Impacts

South Norfolk District Council provided a list of TCPA applications for consideration with regard to the cumulative impacts, and these should be included within Appendix 23.1 '*Long List of Developments'* to accurately assess the impacts and we would expect due consideration to be given to these. Details of these applications are available on the Council's website and can be provided again if necessary.

South Norfolk District Council is currently host to multiple NSIPs including three offshore windfarms under construction, three highway upgrade projects under construction, Norwich to Tilbury overheard lines project in its recommendation stage and East Pye Solar currently in examination. The cumulative impact and disruption of these during their construction should be taken into consideration within the ES.

Socio-Economic Impacts

South Norfolk District Council considers that this topic should be scoped in. The effects and disruption for local business should be fully assessed for Construction, Operation, and any Decommissioning.

Equally, South Norfolk with its Market Towns of Diss, Harleston, Loddon and Wymondham; numerous Heritage assets including Saxon and Norman Churches; the Waveney Valley; Boudicca Way; museums; walking and cycling routes; associated accommodation; and venues for example, provides a rich tourism/visitor offer. The Council considers a full assessment of the impacts of the project would have on known features, directly and indirectly should be provided.

South Norfolk District Council wishes to continue to engage with the developer to seek to minimize the impact of the development on its communities and environment in a constructive and respectful manner and welcome the developer's comments that there will be continued consultation through the process.

Yours faithfully

[redacted]

[redacted]
Senior Planning Officer
t [redacted]@southnorfolkandbroadland.gov.uk
South Norfolk District Council

Rishabh Rai

From: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 21 September 2026 15:52
To: Suffolk WRTS
Subject: Re: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

You don't often get email from enquiries@sphere-connections.co.uk. Learn why this is important

Hi Rishabh,

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks

[redacted]

[redacted] | Head of Asset Management & Operations | Sphere Energy Connect
E: s[redacted]@sphere-connections.co.uk | M: [redacted]

Internal Use

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 03 September 2026 20:18
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Dear Sir/Madam

Please see attached correspondence on the proposed **Suffolk Water Recycling Transfer and Storage**.

The Applicant for the Proposed Development intends to make an application for Development Consent under

Suffolk County Council

SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE

EIA Scoping Opinion Response

2 October 2026

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Glossary of Acronyms and Abbreviations

AIL	*Abnormal Indivisible Loads*
AWRP	*Advanced Water Recycling Plant*
CEMP	*Construction Environment Management Plan*
DCO	*Development Consent Order*
DEPZ	*Detailed Emergency Planning Zone*
EIA	*Environmental Impact Assessment*
ES	*Environmental Statement*
HDD	*Horizontal Directional Drilling*
HE	*Historic England*
HER	*Historic Environment Records*
LHA	*Local Highways Authority*
LiDAR	*Light Detection and Ranging*
NSIP	*Nationally Significant Infrastructure Project*
OSEP	*Outline Skills and Employment Plan*
PIS	*Preservation in Situ*
PPA	*Planning Performance Agreement*
REPPIR 19	*Radiation (Emergency Preparedness and Public Information) Regulations 2019*
SBIS	*Suffolk Biodiversity Information Service*
SCCAS	*Suffolk County Council Archaeological Service*
SPA	*Special Protection Area*
SRN	*Strategic Road Network*
SSSI	*Site of Special Scientific Interest*
SWRTS	*Suffolk Water Recycling, Transfer and Storage*
WRC	*Water Recycling Centre*

"The Council" / "SCC" refers to Suffolk County Council.

Purpose of this Document

Suffolk County Council has prepared the document to respond to the Planning Inspectorate's request for an Environment Impact Assessment (EIA) Scoping Opinion for the proposed Essex and Suffolk Water Suffolk Water Recycling, Transfer and Storage (SWRTS) scheme.

1 Introduction

1.1 The proposed development is to build an Advanced Water Recycling Plant (AWRP) with a maximum daily deployable output of 11 million litres a day (11 Ml/d). The site for the AWRP is likely to require approximately 9 hectares (ha). The AWRP will receive up to 16 Ml/d of treated wastewater from the existing Lowestoft Water Recycling Centre (WRC) which is owned and operated by Anglian Water Services.

1.2 The works will also include the construction of a new pumping station and potential minor modifications to the existing Lowestoft Water Recycling Centre (WRC) to divert treated wastewater to the AWRP and two proposed storage reservoirs for the storage of drinking water, located at strategic locations for onward supply and will be sized to provide 36 hours of storage. The central reservoir will have a capacity of approximately 17Ml and the western reservoir will be approximately 13Ml. The reservoirs will likely require a construction site size of approximately 4ha each.

2 General Comments

2.1 This document is Suffolk County Council's (SCC) response to The Planning Inspectorate's request for comments to inform the adoption of an Environmental Impact Assessment (EIA) scoping opinion by the Planning Inspectorate regarding Essex and Suffolk Water's Water Recycling, Transfer and Storage project.

2.2 This response contains the technical comments of staff directly employed by Suffolk County Council (SCC) specifically on the question of the adoption of an EIA Scoping Opinion and is not intended to comment on the merits of the proposals. SCC's position on the merits of the proposal will be informed by its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy[1].

2.3 SCC considers that cumulative impacts need to be fully assessed. The proposed scope of assessment appears inadequate, in part, due to the unnecessarily

[1] https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(24-02-2026),%20The%20Cabinet

restrictive criteria for identifying cumulative developments. Further detail is provided in the detailed part of this response.

2.4 Robust mitigation measures should be included in the Environmental Statement to ensure impacts potentially resulting from the development are minimised as far as possible. The Council expects ongoing engagement during the formation of the final application in order for these measures to be discussed and agreed as far as possible prior to submission. Other relevant authorities and statutory bodies should also be engaged in a similar way.

2.5 The potential for impacts arising from odour are of particular concern for the Council given the nature of the project, which will involve disposal of product removed from treated water and the options for the AWRP being near settlements. SCC does not agree that odour impacts may be scoped out as stated in paragraph 15.5.21. Rather, a robust assessment based on modelling in accordance with relevant guidance on best practice should be included in the Environmental Statement in order to inform adequate monitoring and mitigation measures. Without this, SCC does not see how there can be confidence that the application will satisfy paragraph 4.6.7 of the National Policy Statement for water resources infrastructure[2] which states:

i. "*The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and steam.*"

2.6 In what follows, detailed comments are provided on the applicant's EIA Scoping Report.

[2] https://assets.publishing.service.gov.uk/media/6874ca77c831dea2b152cfe9/E03400114_National_Policy_Statement_for_Water_Resources_Web_Accessible.pdf

Impacts by Service Area

3 Archaeology

3.1 Suffolk County Council Archaeological Service (SCCAS) are pleased that archaeology and heritage have been included in the list of impacts to be considered as part of the EIA for the SWRTS scheme.

3.2 SCCAS welcome that the scoping documents recognise, at a high level, the potential impacts of the proposed scheme upon above and below ground archaeology and heritage. From the information provided in the EIA scoping reports, all elements of the scheme (the pipe routes, haul roads, compounds, reservoir sites, recycling centre sites, Horizontal Directional Drilling (HDD) pits, and ecological mitigation etc.) will damage or destroy any surviving archaeological remains. However, the current study area has in most parts never been subject to systematic archaeological investigation and, therefore, the character, extent, and significance of surviving above and below ground heritage assets across this area has yet to be defined.

3.3 As such without further assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.

3.4 SCCAS is pleased that the scoping documents recognise the need for archaeological assessment and mitigation work in association with the scheme and also that provision has been made to assess the impact of the proposals upon the setting of above ground heritage assets.

3.5 As has been shown by the East Anglia One (EA1), Sizewell C, Lionlink and Sealink schemes, time will again be a critical factor for SWRTS. Archaeological and heritage assessments and mitigation phases must be programmed into the project at the earliest opportunity, with sufficient time allowed to enable fieldwork to be completed prior to the start of construction works, to avoid any delays to the development schedule.

3.6 SCCAS would strongly advise that a dedicated archaeological consultant is appointed to the project at this stage in project planning to try to ensure the smooth delivery of the archaeological requirements for the project alongside other elements of the scheme.

Baseline Information

3.7 Data regarding known above and below ground heritage assets present within the study area comes from information recorded within the County Historic Environment Records (HER) and from designated heritage assets.

3.8 SCCAS is pleased that provision has been made to consult the County HER to identify known undesignated heritage assets within this area. The majority of sites currently recorded on the County HER within the study area have been identified through finds scatters and aerial photography.

3.9 The rivers Waveney, Blyth, Yox, and Dove flow through the study area, much of which is situated on light soils (especially in the east of the county), meaning that there are many favourable locations for archaeological activity from all periods. This is attested to by the multi-period finds scatters which have recorded throughout the study area. the central clay in Suffolk, should not be discounted due to lower concentrations of finds as it is becoming clearer due to recent works that this is likely a result of discovery biases.

3.10 Current recorded sites within the study area of notable significance include, but are not limited to:

- BLN 009 and any other parts of BLN 066 barrow cemetery
- LUD 006 and LUD 006 Roman farmstead?
- SOL 008 Roman Farmstead
- SOL 035 Roman settlement
- SBT 018 Sibton Abbey Park
- HXN 051 likely cemetery
- YAX 017 likely cemetery
- YAX 018 likely cemetery
- YAX 073 Roman settlement (trenched all ready, mitigation defined)

3.11 Portable Antiquities Scheme finds (those recorded as monuments on the HER) do not appear to have been included in the lists of HER records. Unless they are confidential, they should be included in the report. Or at the very least their existence and a commitment to understanding impacts on them should be noted. Some of these are indicators of surviving below ground remains of significance.

3.12 As the majority of the study area has never been subject to systematic archaeological investigation, there is high potential for additional, and as yet unknown, important heritage assets to survive across much of this area. Some of these may be of national significance and worthy of preservation in situ. This has been clearly demonstrated by the East Anglia ONE (EA1), Sizewell C, Lionlink and Sealink schemes, where a significant number of archaeological sites have been defined, the majority of which were not previously recorded on the County HER or associated with finds scatter or cropmark evidence which indicated the likely presence of surviving below ground remains.

3.13 Archaeological investigations immediately adjacent to the study area have yielded extensive multi-period archaeological remains, (e.g. Eye, Halesworth, Saxmundham and Sizewell areas) some of which are not yet fully recorded on the HER. This highlights that similar archaeology is likely to continue into the study area, particularly given the comparative soils and topography. An effort should be made to obtain information regarding the results from projects which interact with or are immediately adjacent to the scheme area.

3.14 As such, thorough desk top assessment and field evaluation is needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

Methodology

3.15 SCCAS would advise that the impact of this development upon archaeology and heritage cannot be assessed until a full archaeological evaluation has been undertaken over the whole development area. The results of this work will enable an accurate review of the nature, quality, and extent of the archaeological resource across the study area. Archaeology and heritage should be factored into the decision-making process regarding the final reservoir sites and pipe route (plus associated infrastructure locations); therefore, the information generated through archaeological evaluation must be available at an early stage.

3.16 As identified in the scoping documents a desk-based assessment would be appropriate in the first instance for the entire study area. This should include a historic map regression, a study of aerial photography (including historic imagery), an assessment of Light Detection and Ranging (LiDAR) data, and predictive modelling of potential based upon topographic and geological evidence (including palaeolithic assessment). Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.

3.17 A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.

3.18 SCCAS would advise that all areas which will be impacted upon by the different elements of the SWRTS scheme, or which form possible option sites, should be subject to archaeological field assessment at this stage in considering the location, layout and design of reservoir sites and pipe routes, to allow for preservation in situ where appropriate of any sites of importance that might be

defined (and which are currently unknown) and to provide information to contribute to the site selection process.

3.19 The approach to evaluation can be refined following desk-based assessment.

3.20 Geophysical survey (a combination of magnetometry and resistivity as appropriate), also accompanied by fieldwalking and a metal detecting survey, should form a first phase of field evaluation

3.21 The results of these assessments should be used to then inform a programme of trial trenched evaluation (and potentially palaeolithic evaluation fieldwork), combined with palaeo-environmental assessment in river valley areas.

3.22 SCCAS would advise that all sites which will be impacted by any element of the onshore works should be subject to trial trenching at EIA stage. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and also to contribute to risk management. Upfront work will ensure all options can be properly considered (including giving proper thought to preservation in situ and alternative solutions), avoiding unexpected costs and delays post-consent. Evaluation at this stage will test the suitability of sites for development, given the reduced flexibility for mitigation through design once reservoir sites and pipe routes are finalised.

3.23 The combined results of the above assessments should then be used to develop a mitigation strategy for the reservoir sites, pipe route, and all associated infrastructure. Some areas (as yet unidentified) may require localised preservation in situ (PIS) where appropriate. For surviving below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the resultant mitigation included should include proposals to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, will be based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work should also be included.

3.24 All phases of archaeological evaluation and mitigation must be subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS. All stages of the work will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled. The reference to the role of SCCAS/HE (Historic England) is welcome within the scoping documents (Para 11.3.1 scoping report).

Specific comments

3.25 2.4.6 CEMP should also reference archaeology.

3.26 3.3.20 Pre-commencement works involving ground disturbance do have the potential to have significant impacts upon any archaeological remains which are present Archaeological evaluation and mitigation MUST be completed in each area of the scheme prior to any other pre-commencement works involving ground disturbance. This expectation should also be highlighted within the archaeology chapter of the ES.

3.27 11.1.6 Name the archaeologist please.

3.28 11.3.5 This has been agreed; some boreholes will be monitored by a geoarchaeologist with all results being combined into an assessment report. One borehole should be moved, or if it cannot be moved should be stripped and fully monitored by an archaeologist.

3.29 11.4.1 DBA should also include a historic map regression and predictive modelling of potential based upon topographic and geological evidence. The impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data. Landscape should be considered for assessment as an aspect of the historic environment. The DBA also needs to take the results from other schemes it interacts with into consideration.

3.30 11.5.2 Also any pre-commencement works involving ground disturbance, compounds, ecological mitigation etc.

3.31 11.5.5 and 11.5.6 (and table 11.4) Unless any works were to take place within PIS areas.

3.32 11.5.11 Or within PIS areas.

3.33 11.7.4 Strip map and excavate (sampling defined by SCCAS, with potential for lower percentages but not as a certainty), depending on nature of works and potential.

3.34 11.7.7 Also setting out measures to ensure archaeological mitigation and PIS requirements are followed during construction

3.35 (e.g. system to ensure that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS are suitably protected. The CEMP should also set out the

provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas (if relevant).

3.36 11.8.2 Whole scheme has archaeological potential. Full RLB area needs geophysics and eval. Potential for extensive and currently unknown remains (including though of high significance) to be present throughout the route as majority has seen limited previous archaeological assessment. Also, geophysics will not pick up all heritage assets, including some of potentially national significance e.g. cemeteries. Full and thorough evaluation essential to inform scheme design and appropriate mitigation.

3.37 11.8.11 (and table 11.4) does not mention set piece excavation, only SMS (with the attendant issues of SMS in 11.7,4 already noted)

3.38 11.8.16 Designated assets within the scheme are currently known…

3.39 23.2.1 interactions noted, but in general terms, these will need to be specific to archaeology, notably preservation in site defined by other schemes.

3.40 Appendix 11.1 - 1.5 Missing SCCAS guidance and Fieldwork Standards in the East of England

4 Ecology

4.1 The full Ecological Impact Assessment report must include the assessment of impacts such as noise, visual disturbance, loss of habitat connectivity, air quality and how these impacts will be mitigated.

4.2 The significance of the impacts on protected species and habitats should be explained in detail (refer to CIEEM guidelines on the significance of impacts on ecological receptors).

4.3 The Ecological Impact Assessment report must include robust mitigation measures to ensure that impacts on protected species and habitats potentially resulting from the development are minimised as far as possible.

4.4 There are numerous internationally designated sites (Special Protection Area, Special Area of Conservation, RAMSAR sites) within and close to the proposed scheme limits, including Broads SPA/RAMSAR site, Minsmere-Walberswick SPA/RAMSAR site, Alde-Ore Estuary SPA, Benacre to Easton Bavents SPA and the Outer Thames Estuary SPA. A habitat regulations assessment/appropriate assessment will be required to assess the potential impacts of the scheme on the abovementioned designated sites and the species associated with them (Marsh Harrier, Bittern, Otter, Great Crested Newt, Woodlark for example).

4.5 Additionally, there are numerous Sites of Special Scientific Interest within or close to the proposed scheme limits. These include Sotterley Park SSSI (designated for its ancient woodland habitat), Snape Warren SSSI (designated for its saltmarsh and mudflat habitats), Metfield Meadow SSSI (designated for its unimproved grassland habitat) and Chippenhall Green SSSI (designated for its unimproved grassland habitat). The proposed pipeline route must be carefully chosen so as to avoid all of these ecologically sensitive habitats and must avoid severing connectivity to these habitats.

4.6 There are also other designated sites within the proposed DCO boundary. These include Local Nature Reserves, County Wildlife Sites and Roadside Nature Reserves. Further information on these sites can be obtained from Suffolk Biodiversity Information Service (SBIS). Should any of these sites be potentially impacted by the works, the applicant should demonstrate how impacts on these sites will be mitigated for and minimised.

4.7 SCC Ecology have not seen surveys for breeding birds, amphibians (including Great Crested Newt), badger, bats, water vole, otter, other mammals, INNS, reptiles, and invertebrates to be carried out. All surveys need to be undertaken by suitably qualified ecologists at the appropriate time of year (see CIEEM guidelines). The habitat baseline within the proposed red line boundary will also need mapping for BNG purposes.

4.8 Suffolk Biodiversity Information Service (SBIS) should be contacted regarding protected species and habitats records within the proposed DCO boundary limits.

4.9 SCC Ecology would like to see a copy of the 2025/2026 wintering bird survey report once this is available.

4.10 Where non-designated roadside verges may potentially be impacted (by new access points off existing highways for example), these will need assessing for their biodiversity value. Roadside verges provide a valuable corridor for wildlife to enable them to move between habitat areas.

4.11 SCC Ecology would like to understand the applicant's proposals on how the scheme will deliver Biodiversity Net Gain, and whether this will use onsite habitat enhancement/creation measures or the purchase of offsite habitat units (or a combination of both options).

4.12 All species survey results should be shared with Suffolk Biodiversity Information Service (SBIS).

4.13 SCC Ecology would like to know whether Marine Net Gain is being considered for the Long Sea Outfall installation. If so, the applicant should explain how this will be achieved.

4.14 SCC Ecology would like to understand whether any marine habitat impacted by the installation of the Long Sea Outfall will be reinstated to its original condition once all works are complete.

4.15 The Applicant should quantify the potential for disturbance of species associated with the National Site Network sites within and adjacent to the proposed DCO boundary, such as the Benacre to Easton Bavents SPA, Minsmere to Walberswick SPA, Outer Thames SPA, Broadland SPA/RAMSAR site and the Breydon Water SPA. This topic should be covered in the Habitat Regulations Assessment report for the application.

4.16 The Applicant should investigate which habitats will be impacted by location of where the Long Sea Outfall meets the coastline and demonstrate how potential impacts at the landfall site will be mitigated as well as any reinstatement measures.

4.17 Freshwater ecology: all potential impacts on watercourses and the species dependent on them should be assessed by appropriately qualified river condition assessment ecologists. This will also include the habitat baseline for BNG requirements.

4.18 Any surveys for INNS should be robust and include methodology for managing or eradicating these species if they are found to be present within the proposed working areas of the development. The proposed scheme limits are located in an area where Chinese Water Deer and Muntjac (amongst other species) are known to be present in high numbers and the applicant should draw up an appropriate deer management plan to demonstrate how these species will be managed to avoid damaging any newly created habitat areas within the DCO boundary.

4.19 The Applicant should demonstrate how any temporary loss of habitat connectivity created during the pipeline installation and other operations within the DCO boundary will be managed. Temporary measures such as dead hedging or Heras style fencing covered in fake vegetation have been used on other schemes previously where there are any gaps in hedgerows created to retain habitat connectivity overnight for species such as bats.

4.20 Should you wish to discuss any of the above matters, please contact the SCC Ecology Team and we will be happy to discuss these matters and provide any relevant information as required.

5 Economy, Skills, and Tourism

5.1 SCC welcomes the inclusion of socio-economic effects within the scope of the Environmental Impact Assessment and the commitment to prepare an Outline Skills and Employment Plan (OSEP). However, Chapter 17 appears primarily focused on baseline economic conditions, employment and business activity and

provides limited detail regarding the assessment of workforce demand, labour market capacity, skills requirements, education and training provision, workforce accommodation, and supply chain opportunities. SCC considers that these matters have the potential to give rise to both beneficial and adverse effects during construction, operation and decommissioning and should be explicitly assessed within the Environmental Statement.

5.2 In preparing the Environmental Statement, the Applicant should reference SCC's The Socio-economic Effects of NSIPs (2025). The assessment should focus on likely socio-economic effects rather than baseline conditions alone and should clearly define the assessment methodology, study areas, assumptions, significance criteria, and assessment thresholds.

5.3 SCC notes the workforce and economic study areas set out in Section 17.2.2. Whilst these may be appropriate for certain socio-economic receptors, the Environmental Statement should demonstrate that the selected study areas are suitable for assessing workforce demand, labour market capacity, skills availability, education provision, and supply chain opportunities. Consistent with SCC guidance, workforce catchments and supply chain catchments should be assessed separately and supported by a clear evidence base.

5.4 The Environmental Statement should provide a detailed assessment of workforce demand across construction, operation, maintenance and decommissioning phases, including workforce numbers, occupations, skill levels, workforce origins, and labour catchments. The assessment should compare projected workforce requirements against available labour supply and identify any potential labour shortages, recruitment pressures, labour displacement, competition for workers and cumulative labour market effects. SCC guidance also expects the assessment of low, medium, and high home-based workforce scenarios, with the low home-based workforce scenario forming the basis of the worst-case assessment.

5.5 Cumulative workforce and skills impacts will be particularly important given the scale of infrastructure development anticipated across Suffolk and the wider East of England during the projected construction period. The Environmental Statement should therefore assess cumulative labour demand arising from other major energy, nuclear, transmission, utility and infrastructure projects and identify the extent to which cumulative demand could exacerbate labour market pressures, skills shortages, and workforce displacement.

5.6 Where workforce requirements cannot reasonably be met locally, the Environmental Statement should assess the implications for housing, temporary worker accommodation, transport networks, and local services, including cumulative effects with other major developments.

5.7 The Scoping Report proposes to scope out operational employment, skills, and labour market effects. SCC does not consider that these matters should be scoped out solely on the basis of anticipated workforce numbers. Whilst operational employment may be limited compared with construction, the roles are likely to be skilled and long-term in nature and may contribute positively to workforce retention, technical capability, and skills development within Suffolk. The Applicant should therefore provide a robust justification for the proposed scope out or undertake a proportionate assessment of operational effects.

5.8 The Environmental Statement should also include a dedicated assessment of supply chain opportunities and effects. Consistent with SCC guidance, this should assess opportunities at hyper-local, county, and regional levels and identify the extent to which procurement expenditure may be secured by local businesses.

5.9 SCC notes the proposal to scope out education and visitor facilities because the Proposed Development does not include dedicated education infrastructure. Whilst SCC accepts this position in relation to physical facilities, the Environmental Statement should nevertheless assess the capacity of the education and skills system to support workforce requirements generated by the Proposed Development. This should include consideration of further education, higher education, apprenticeships, independent training provision, curriculum alignment, and skills gaps.

5.10 The OSEP should be informed by the findings of the socio-economic assessment and developed in consultation with SCC's Regional Skills Coordination Function and relevant stakeholders. It should identify proposed skills, employment and social value interventions, delivery arrangements, monitoring mechanisms and measurable outcomes, including apprenticeships, work experience, training opportunities, and support for under-represented groups.

6 Flood and Water Environment

6.1 The applicant will need to undertake an assessment of flood risk to ensure that the infrastructure is in the lowest areas of predicted flood risk (fluvial, pluvial, groundwater, foul and reservoir) and does not increase flood risk of any type to others. This assessment should include consideration of the national flood maps[3], national standards for SuDs[4] and SCC's local SuDs guidance as LLFA[5].

[3] https://flood-map-for-planning.service.gov.uk/

[4] https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds

[5] https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf

6.2 The development will need to manage the surface water runoff from the permanent and temporary sites and ensure that flood risk and pollution is managed to national and local policy/guidance.

6.3 Any impoundment of water will cause a potential flood risk, and breach scenarios should be modelled to show the potential impact on adjacent landowners and infrastructure.

6.4 The applicant should look to undertake ground investigations to ensure that the infrastructure does not cause harm to groundwater.

6.5 Any crossings of watercourse should be done by direct drill beneath the bed of the watercourse (min 1.5m) where possible. Where a temporary open trench crossing is required, consent/permitting from the relevant authority (EA, LLFA, IDB) will be required and the watercourse be reinstated as previous.

7 Highways

7.1 Suffolk County Council (SCC), in its capacity as the Local Highway Authority (LHA), has reviewed the traffic and access information contained within the Environmental Impact Assessment Scoping Report.

7.2 The following comments identify matters that SCC considers should be addressed as the project progresses. They relate principally to the proposed study area, data collection, construction traffic, workforce movements, cumulative effects, assessment methodology, mitigation, management plans, Abnormal Indivisible Loads, and the information required to support the future Transport Assessment.

Study Area

7.3 The study area should include:

- the A12 between the A14 Seven Hills Interchange and Lowestoft.
- the A140 between its junction with the A14 and its junction with the A143; and
- any other roads that may provide access to or from the construction areas, including the A1120, A144 and A145.

7.4 It is noted that paragraph 13.2.4 identifies the A1120, A144 and A145 as roads that may also be included. Where these or other roads may be used by construction traffic or affected by the proposed works, they should be included within the study area and assessment.

7.5 The list in paragraph 13.2.2 appears to exclude local C roads and unclassified roads. These roads should be included where they may be used by construction traffic or otherwise materially affected by the proposed development.

7.6 SCC notes the applicant's proposal to use haul roads to keep traffic off parts of the public highway network. However, the construction of haul roads may itself

generate additional construction vehicle movements. These movements should be taken into account within the relevant traffic forecasts and assessments.

7.7 Within paragraph 13.1.2, the definition of an HGV should be refined for clarity. For other Nationally Significant Infrastructure Projects (NSIPs), an HGV has been defined as a commercial vehicle exceeding 3.5 tonnes.

7.8 It is noted from the figures, including Figures 13-1 and 13-2, that the scoping area has been drawn to reflect the proposed works, while highway elements referred to elsewhere fall outside the identified red line boundary. SCC seeks confirmation that all relevant highway elements falling outside the red line boundary will nevertheless be included within the scope of the assessment.

7.9 SCC notes that the applicant has provided a list of highway interfaces for each component of the project in Tables 13-2 to 13-12, which the applicant considers should be included within the scope of the assessment.

7.10 Insufficient information has been provided at this stage to enable SCC to comment in detail on each interface. In particular, further information will be required regarding:

- the proposed locations and forms of access.
- the anticipated volume and composition of construction traffic.
- the proposed construction traffic routes; and
- the timing and duration of construction activity.

7.11 Initial comments are provided below regarding interfaces that may interact with other proposed, consented or under-construction NSIPs.

7.12 In Tables 13-2 to 13-12, the term “SRN” appears to have been used to describe several roads that form part of the Local Road Network rather than the Strategic Road Network. The classification of these roads should be reviewed and corrected where necessary.

Data Collection

7.13 Caution should be exercised where professional judgement is relied upon in place of recently collected data.

7.14 For a scheme of this significance and geographical scope, traffic surveys are likely to be required at specific locations, as available data may be limited, dated, or insufficiently detailed.

7.15 While strategic transport models may assist with assessment at a regional level, care should be taken where model outputs are used as a proxy for the assessment of individual junction capacity. Junction-specific assessments should be supported by suitable and sufficiently recent traffic data.

7.16 The proposed scope, methodology, timing, and locations of traffic surveys should be discussed with SCC before the surveys are undertaken. This will help to ensure that the data collected are suitable for the proposed assessments and avoid unnecessary or abortive work.

Table 13-5: Proposed WSR Section of the EIA Scoping Area

7.17 The preferred option for the WSR is located directly adjacent to the A140, which is the primary north-south strategic route connecting Ipswich and Norwich. However, access may be constrained by the geometry and characteristics of the surrounding highway network.

7.18 The cumulative traffic impacts arising from the project, in combination with other proposed, consented or under-construction NSIPs that may use the A140 for construction traffic, should be assessed. This should include, where relevant, the EcoPower and Norwich to Tilbury projects. The assessment approach and findings should be discussed with SCC in its capacity as the LHA.

7.19 Table 13-5 of the Scoping Report identifies a potential temporary access from Stuston Lane. However, Stuston Lane does not appear to connect directly to the proposed WSR site. Temporary and permanent access may therefore need to be provided from the A140, Brome Link Road or Eye Road. The proposed access strategy should be clarified.

7.20 Although construction routes have not yet been provided, the town of Eye is subject to an environmental weight restriction through its centre. The movement of HGVs through Eye is also a sensitive local issue. These matters should be recognised when identifying and assessing potential construction routes.

7.21 The Order Limits to the north of Eye overlap with the proposed EcoPower project, specifically its proposed Areas 1 and 2. The potential interaction between the projects should be considered as part of the cumulative assessment and construction planning process.

Table 13-10: Proposed Saxmundham to Sizewell C Pipeline Section of the EIA Scoping Area

7.22 The proposed route for this element of the project will interact with the proposed LionLink cable corridor to the north-east of Saxmundham.

7.23 There will also be significant overlap with the Sizewell C project in this area, including the Sizewell Link Road. The Sizewell Link Road and associated changes to the highway network should be reflected in the relevant baseline, future baseline, and traffic assessments.

7.24 Table 13-13 does not appear to refer to Abnormal Indivisible Load movements during the operational phase, for example where pumps or other substantial

equipment may require replacement. Although such movements may be limited in number, they may nevertheless be disruptive and should be considered within the assessment.

Alternative Delivery Methods

7.25 The applicant should consider alternative methods of delivering construction materials, including the use of rail or seaports where practicable. Several railheads are located within or close to the project area.

7.26 The Long Sea Outfall and Advanced Water Recycling Plant sections of the project are in close proximity to Lowestoft and Great Yarmouth, both of which have rail connections and seaport facilities.

7.27 The Sizewell C project includes a Beach Landing Facility and a new rail route. As the proposed project includes a pipeline connection to Sizewell C, there may be opportunities for collaborative working or the shared use of Sizewell C facilities. These opportunities should be explored with the relevant parties where practicable.

Construction Traffic

7.28 Insufficient information has currently been provided regarding:

- HGV movements.
- LGV movements.
- construction workforce numbers.
- associated workforce traffic.
- traffic generated by the individual project components.
- construction traffic routes; and
- the timing and duration of construction activity.

7.29 SCC would welcome early sight of the proposed construction routes to enable it to provide appropriate advice and assist in identifying potential highway constraints.

7.30 Paragraph 13.8.10 refers to further work on trip generation and traffic distribution. However, limited information is presently available regarding the likely scale, distribution, and timing of construction traffic.

7.31 Detailed traffic forecasts should be provided to enable the magnitude of effects on the highway network to be assessed. The assessment should consider, where relevant:

- driver delay.

- accessibility.
- road safety; and
- highway and junction capacity.

7.32 Detailed construction traffic forecasts should be provided for each principal project component and should include:

- peak construction flows.
- peak daily vehicle movements.
- the proportions of HGV and LGV movements.
- construction phasing.
- traffic routing; and
- workforce movements.

7.33 Within Figure 13-3, some routes are labelled as "local access routes with restrictions". In several locations, including Leiston and Eye, the relevant restrictions are environmental weight restrictions. These may prevent access by vehicles exceeding 7.5 tonnes unless those vehicles are travelling to premises within the restricted areas.

7.34 The implications of these restrictions should be clearly identified when preparing the construction traffic routing strategy.

Construction Workforce

7.35 Information regarding the construction workforce is currently very limited.

7.36 Workforce movements can represent a significant proportion of construction-related traffic and should therefore be appropriately reflected in the traffic forecasts and environmental assessment.

7.37 A clear workforce travel strategy, supported by evidence-based assumptions, should be provided. This should include details of:

- workforce numbers.
- shift patterns.
- anticipated modes of travel.
- vehicle occupancy assumptions; and
- the measures proposed to manage workforce travel.

Cumulative Impact

7.38 The cumulative traffic impacts arising from this project, in combination with other proposed, consented or under-construction NSIPs that may use the A12 for

construction traffic, should be assessed. The assessment approach and findings should be discussed with SCC in its capacity as the LHA.

7.39 In particular, the peak construction period for Sizewell C may coincide with, or take place at approximately the same time as, the delivery of this project. The implications of any overlap should be assessed.

7.40 Limited information has been provided regarding the developments and infrastructure schemes that will be included within the cumulative impact assessment.

7.41 Traffic flow data should be assessed in combination with the following consented, proposed and under-construction NSIPs where they may interact with the proposed project:

- Sizewell C, under construction.
- East Anglia ONE North, under construction.
- East Anglia TWO, consented.
- Norwich to Tilbury, awaiting a decision.
- Sea Link, awaiting a decision.
- LionLink, proposed; and
- EcoPower, proposed.

7.42 This list should not be treated as exhaustive. Other developments and infrastructure projects may also need to be included where they could materially affect the relevant parts of the highway network.

7.43 Numerous smaller local developments should also be considered within the cumulative traffic assessment. Details of relevant developments should be obtained from the relevant district and borough councils.

7.44 The proposed cumulative assessment methodology, assessment years and development assumptions should be discussed with SCC and the relevant local planning authorities at an early stage.

Management Plans and Control Measures

7.45 The proposed control measures do not currently include sufficient consideration of traffic generated by the construction workforce.

7.46 SCC acknowledges that limited public transport provision across much of the project area may make workforce travel planning challenging. Nevertheless, the applicant should identify practicable measures to reduce workforce trips by private car and promote sustainable or shared travel wherever possible.

7.47 Potential measures could include:

- car sharing.
- crew minibuses.
- the use of public transport where practicable; and
- cycling and walking where appropriate.

7.48 Control measures and management plans should include pre-commencement and enabling works within their scope. Experience has demonstrated that these works can result in significant adverse local effects if they are not appropriately planned and managed.

7.49 The content and scope of the relevant management plans and control measures should be developed in consultation with SCC in its capacity as the LHA.

Assessment Methodology

7.50 Broadly, the proposed assessment approach is considered to provide a reasonable starting point. However, data collection and the application of professional judgement both involve an element of uncertainty.

7.51 Assessment criteria should not be applied rigidly where uncertainties exist within the underlying data or assumptions. An effect should not automatically be dismissed solely because it falls marginally below a specified numerical threshold.

7.52 The sensitivity of receptors and locations will be a key consideration when determining environmental effects. Early engagement between the applicant and SCC would therefore be welcomed to minimise the potential for future disagreement, particularly where assumptions are made regarding local conditions.

7.53 One example of a potentially inappropriate assumption would be concluding that pedestrians do not use a route solely because no dedicated pedestrian infrastructure is present within the highway. The absence of formal infrastructure does not necessarily demonstrate the absence of pedestrian, cyclist, or equestrian use.

7.54 When considering the duration of effects, attention should be given to repeated construction activities within individual communities. While an individual project may result in a short- or medium-term effect, the cumulative effect of multiple projects undertaken over an extended period may constitute a long-term effect for the affected community.

7.55 Examples may include roads or Public Rights of Way that are repeatedly closed and reopened to facilitate several different projects.

Mitigation

7.56 Care should be taken when proposing the movement of workers outside established network peak periods as a mitigation measure.

7.57 Given the number of NSIPs and other construction projects that may propose similar measures, there is a risk that coinciding shift start and finish times could create a different network peak, for example between 07:00 and 08:00 rather than between 08:00 and 09:00.

7.58 Any proposed temporal distribution of construction or workforce movements should therefore be assessed against the anticipated cumulative traffic conditions and not solely against the existing network peak periods.

Transport Assessment and Construction Traffic Management Plan

7.59 A Transport Assessment and Construction Traffic Management Plan should be submitted in support of the Development Consent Order application.

7.60 These documents should adequately consider the effects of traffic generated by the proposed development, including:

- construction traffic.
- workforce traffic.
- pre-commencement and enabling works.
- operational traffic.
- Abnormal Indivisible Loads; and
- cumulative traffic associated with other relevant developments and infrastructure projects.

7.61 SCC, in its capacity as the LHA, will need to understand the traffic impacts arising from the proposed development, both in isolation and cumulatively with other consented, proposed and under-construction projects in the surrounding area.

7.62 In addition to the implications for network peak periods, the Transport Assessment should consider:

- the suitability of each proposed highway access.
- the visibility required at each access.
- consequential effects, including any vegetation removal required to provide suitable visibility.
- the geometry and physical characteristics of access routes.
- the suitability of affected roads for the type and volume of traffic proposed.
- road safety.

- network and junction capacity.
- impacts on Public Rights of Way and non-motorised users.
- the identification of feasible Abnormal Indivisible Load routes; and
- constraints including weak bridges, structures with restricted capacity and restrictive road geometry.

7.63 Surveys and site visits are likely to be necessary to provide sufficient detail to identify the direct and consequential effects of the proposed access arrangements.

Existing Baseline

7.64 No details appear to have been provided regarding the extent or location of the proposed traffic surveys.

7.65 The survey scope, methodology, timing, and locations should be discussed with SCC before the surveys are undertaken. This will help to ensure that the data collected are appropriate for the assessment and avoid unnecessary or abortive work.

7.66 The baseline should be supported by data that are sufficiently recent and representative of typical network conditions. Any adjustments made to survey data should be clearly explained and justified.

Future Baseline

7.67 The number of proposed schemes in the north and east of Suffolk makes the assessment of future-year conditions particularly complex.

7.68 The future baseline, assessment years and assessment scenarios should therefore be discussed with SCC and the relevant local authorities at an early stage. It may be necessary to evaluate several scenarios to account for different combinations of project phasing and delivery.

7.69 The assumptions adopted for each future-year scenario should be clearly documented and supported by appropriate evidence.

7.70 16. Table 13-19: Summary of Traffic and Access Scope

7.71 SCC considers that open spaces, recreational sites, and shopping areas should be included as receptors within the assessment.

7.72 The pipeline corridors cross numerous Public Rights of Way and minor roads that are well used by walkers, cyclists, and horse riders. Public open spaces may also experience reduced use as a result of:

- their proximity to the project.
- temporary or permanent changes to access.

- disruption caused by construction activity; or
- severance of access routes.

7.73 The Applicant should provide an explanation regarding why horse riding has been scoped into the operational phase while walking and cycling have been scoped out.

7.74 Walking, cycling and horse riding should be combined into a single receptor category covering the amenity of all non-motorised users, unless a clear justification is provided for assessing these users separately.

7.75 A similar inconsistency arises in relation to the decommissioning phase, for which horse riding has been scoped out but walking and cycling have been scoped in.

7.76 The receptors assessed for the decommissioning phase should ordinarily be consistent with those assessed during the construction phase, as decommissioning may involve activities and effects similar to those arising during construction. Any proposed differences should be clearly explained and justified.

Abnormal Indivisible Loads

7.77 In paragraph 13.7.10, the applicant states that established management practices are available for moving Abnormal Indivisible Loads (AILs), including the Electronic Service Delivery for Abnormal Loads notification process.

7.78 However, this is a binary notification process under which proposed movements may be accepted or rejected. It does not remove the need to identify and assess the physical and operational constraints affecting potential AIL routes.

7.79 SCC, in its capacity as the LHA, is aware of structures on the highway network that may not be capable of accommodating certain AILs, including vehicles operating under Special Types General Orders.

7.80 Early engagement with SCC is necessary to:

- identify relevant highway and structural restrictions.
- identify potential AIL routes.
- determine whether further structural or route assessment is required; and
- review the capacity of affected structures.

7.81 Where necessary, additional assessment may be required to determine whether mitigation measures relating to highway structures are needed.

7.82 Care should also be taken to ensure that viable routes to key infrastructure remain available during the operational phase, for example where heavy or bulky pumps or other equipment require replacement.

7.83 Potential operational AIL movements should not be scoped out of the assessment, as appears to be proposed in Tables 13-16 and 22-4.

Plans and Drawings

7.84 All relevant plans and drawings should show the Sizewell Link Road and other committed highway mitigation.

7.85 The Sizewell Link Road is currently under construction and is expected to be completed before construction of the proposed project commences. It should therefore be appropriately reflected in the relevant baseline and future baseline plans.

7.86 The Sizewell C Green Rail Route has been constructed and should also be shown on the relevant plans and drawings.

7.87 Plans should clearly distinguish, where relevant, between:

- the existing highway network.
- committed highway schemes.
- proposed project infrastructure.
- temporary access arrangements.
- permanent access arrangements.
- haul roads.
- construction traffic routes; and
- relevant Public Rights of Way and non-motorised user routes.

Relevant Highway Data and Guidance

7.88 Where roads are referenced, road numbers and street names should correspond with those recorded in the National Street Gazetteer.

7.89 Information on the National Street Gazetteer is available from GeoPlace.

7.90 Suffolk County Council's highway guidance for NSIPs is available from the Suffolk County Council NSIP information page for developers and project promoters.

7.91 The walking and cycling route information does not acknowledge the presence of Quiet Lanes. Although Quiet Lanes do not have specific legal protection, they form an important part of the county's non-motorised transport network. Relevant information is available from Quiet Lanes Suffolk.

7.92 Suffolk also has an extensive network of Roadside Nature Reserves. Care should be taken to avoid and protect these areas during construction, including

preventing damage caused by construction traffic using minor roads to access project sites.

7.93 Further information is available through the Suffolk Roadside Nature Reserves interactive map.

Conclusion

7.94 SCC considers that the proposed traffic and access assessment provides a reasonable initial basis for further work. However, additional information and engagement will be necessary to establish a sufficiently robust assessment of the project's highway and transport effects.

7.95 In particular, SCC requests:

- early discussion regarding the extent of the study area and the roads to be assessed.
- early discussion regarding the scope, methodology, timing, and locations of traffic surveys.
- clarification of the proposed temporary and permanent access arrangements.
- detailed construction, workforce, and operational traffic forecasts.
- identification and assessment of proposed construction traffic and AIL routes.
- appropriate consideration of proposed, consented and under-construction NSIPs and other relevant developments.
- consistent consideration of pedestrians, cyclists, equestrians, and other non-motorised users.
- assessment of the cumulative duration and effects of repeated construction activity.
- consideration of alternative delivery methods, including rail and marine transport where practicable.
- preparation of a Transport Assessment and Construction Traffic Management Plan proportionate to the scale and impacts of the development; and
- continued engagement with SCC as the project design, assessment and mitigation measures develop.

7.96 These matters should be addressed, where relevant, through the relevant Environmental Statement, Transport Assessment and associated management plans submitted in support of an application.

8 Joint Emergency Planning Unit

8.1 The Major Accidents and Disaster (MA&D) identifies Sizewell A, B and C as manmade features that are external to the proposed development that could have an adverse consequence.

- The list of legislation should include the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR 19) that pertains to Sizewell B (SZB).
- REPPIR 19 sets legal duties for site operators and local authorities to prepare for and respond to radiation emergencies. It requires Suffolk County Council to prepare and maintain off-site emergency plans based on emergency planning zones.
- Proposed developments in the vicinity of SZB could have health consequences for the workforce or impact on emergency planning arrangements and therefore the project should include the SZB Detailed Emergency Planning Zone (DEPZ) within the Zone of Influence (ZoI).
- The Office for Nuclear Regulation (ONR) includes a wider consultation zone (15km from SZB) for proposed developments that could impact on the viability of the emergency response arrangements. This should also be included within the ZoI.
- Wildfires is a major event category proposed to be 'scoped out' of the Environmental Statement (ES). Following the events of this year, the MA&D should consider reinstating wildfires based on the likelihood and potential significance.

8.2 The Cumulative Effects Assessment should include:

- The impact of the project on the safety of SZB, including the cumulative impacts on the transport network.
- The A12 and the main access routes to SZB namely B1122 / Sizewell Link Road (SLR) and B1119 within the Traffic and Access ZoI.
- The North Suffolk Reservoir (NSR) NSIP within the List of Developments.

9 Landscape

9.1 The paragraph numbers included below in brackets refer to the paragraphs in SUFFOLK WATER RECYCLING, TRANSFER & STORAGE EIA SCOPING REPORT VOLUME I: MAIN REPORT August 2026 Planning Inspectorate Reference: WA0210003 Document Reference: 331003515/Vol I/Main Report Revision 01

Study Area

9.2 (10.2.4) Figure 10-4 is referenced regarding representative viewpoints; this should be amended to 10-3. Further, Appendix 10.4 appears not to have been included

with the Scoping documents, only Appendix 10.1, which does not provide any information regarding viewpoints.

9.3 (10.6.3) SCC disagrees with the proposal that visual receptors at distances of greater than 2km from the Proposed Development's above ground components during the operational phase, and from main/satellite compounds during the construction and decommissioning phases, can be scoped out of the assessment in the ES. The reason given (that any such changes can be considered unlikely to materially alter the overall balance of features and elements comprising existing views) is too broad-brushed and not evidenced. SCC considers that a ZTV, which was not available at the time of writing the scoping report, should inform the study area (GLVIA3, paragraph 6.45: The study area should be agreed with the competent authority at the outset and should cover the area from which the proposed development will potentially be visible.)

9.4 SCC would be able to accept a preliminary 2km (as per GLVIA3, paragraph 6.2), on the basis that this is backed up by further evidence, such as a ZTV, and that there remains room for amendments and exceptions.

9.5 (10.6.4-10.6.5) SCC considers that night-time assessments need to be conducted for all receptors that may be affected by the proposals. This includes assessment of lighting as well as noise and vibration and air pollution. Without further information regarding the transient nature and the time frame of construction works, SCC considers that construction works, including in the pipeline corridors must not be scoped out. It is not sufficient to assess effects on above-ground elements, when assessing nighttime effects during construction and decommissioning.

9.6 The further limitation of nighttime assessments to 1km distance of the project (as per Table 10-10) is only acceptable, if it can be demonstrated that no significant effects (for example, as a result of lighting, noise, and vibration) would occur beyond this distance.

Baseline Environment

(Table 10-1) Sources of Baseline Data

9.7 It should be noted that the Suffolk Landscape Character Assessment describes types rather than areas, and the actual geographical local landscape character areas need to be defined within the type and assessed against the type (i.e., how representative any geographically identified character area is for the type).

9.8 It should further be noted that there is a dataset available from SCC for Suffolk Seascape types.

9.9 (10.8.38) For nighttime assessments SCC considers that more up-to-date data for light pollution should be considered to back up the CPRE mapping of England's

light pollution and dark skies, based upon satellite data of sky glow during 1014/2015.

9.10 The Light pollution map - Go Stargazing website provides images up to 2025. It should be noted, however, that their imaging does not pick up emissions from LED luminaires and therefore may also not be showing the full extent of light pollution. It may however deliver a valuable comparison.

Further Impacts proposed to be scoped out of the assessment

Ancient woodland, veteran, ancient and TPO trees outside the Order limits

9.11 (10.6.1) SCC considers that landscape features such as ancient woodland, veteran trees and trees subject to tree preservation orders ('TPOs') located at distances of greater than 15m from the Order Limits need to remain scoped into the assessment in the ES, as it is a) possible that the root protection zones of these could be directly impacted by the Proposed Development's construction, operational or decommissioning activities; and b) there could be indirect impacts and effects on such features, other than those resulting from direct works within the root protection zones, such as air pollution (for example, dust) and contamination (for example, run-off).

9.12 It also must be clarified that any distances from trees and woodlands are measured from the canopy edge rather than the boles of the trees.

Hedges

9.13 (10.6.2) SCC does not consider it proportionate to scope out the assessment of impacts on individual hedgerows and instead, assess solely the Proposed Development's likely significant effects on hedgerows collectively.

9.14 SCC considers that all affected hedgerows need to be accurately surveyed and assessed. Schedules will need to be provided, containing length, length to be managed or removed, species mix, other features (for example, a ditch), and whether the hedgerow is to be considered important under the 1997 Hedgerow Regulations. For Important Hedgerows under the regulations, SCC expects that special measures are considered and applied where possible (for example, HDD or, as a minimum, reduced working corridor widths).

9.15 The EIA will need to support the approach to Hedgerows as set out precedent DCOs - see for example EA1 and EA3 see The East Anglia ONE Offshore Wind Farm Order 2014 [6]and The East Anglia THREE Offshore Wind Farm Order 2017[7]. Another example would be the Bramford to Twinstead Important Hedgerow Assessment

[6] https://www.legislation.gov.uk/uksi/2014/1599/contents
[7] https://www.legislation.gov.uk/uksi/2017/826/article/32

EN020002-000627-6.3.7.5 ES Appendix 7.5 Important Hedgerows Assessment.pdf[8].

- A hedgerow is important, and is protected, if it is at least 30 years old and meets at least one of these criteria:
- marks all or part of a parish boundary that existed before 1850
- contains an archaeological feature such as a scheduled monument[9]
- is completely or partly in or next to an archaeological site listed on a Historic Environment Record (HER)[10], (formerly a Sites and Monuments Record)
- marks the boundary of an estate or manor or looks to be related to any building or other feature that's part of the estate or manor that existed before 1600
- is part of a field system or looks to be related to any building or other feature associated with the field system that existed before 1845 - you can check the County Records Office for this information
- contains protected species[11] listed in the Wildlife and Countryside Act 1981
- contains species that are endangered, vulnerable and rare and identified in the British Red Data[12] books
- includes woody species and associated features as specified in Schedule 1, Part II Criteria, paragraph 7(1)[13] of the Hedgerow Regulations - the number of woody species needed to meet the criteria is one less in northern counties

Proposed Approach to Mitigation

Referring to (10.7.2)

- The design should strive to use existing landscape features and landform to achieve integration and limit visual effects.
- The terminology of 'where practicable' sets too low a bar. It should be 'where possible.'
- A soil management plan will be required.
- A detailed lighting design would need to be provided to be agreed with the relevant local authority.
- It is unclear what is intended for planting.

[8] EN020002-000627-6.3.7.5 ES Appendix 7.5 Important Hedgerows Assessment.pdf
[9] https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/
[10] https://historicengland.org.uk/advice/technical-advice/information-management/hers/ Record (HER)
[11] http://www.legislation.gov.uk/ukpga/1981/69/schedule/5
[12] http://jncc.defra.gov.uk/page-3352
[13] http://www.legislation.gov.uk/uksi/1997/1160/schedules/made

- There should be mitigation for any mature tree lost (ratio of 3 new trees for each tree lost), with impacts on potential veteran and ancient trees being avoided as far as possible, and bespoke compensation where this is not possible.
- SCC considers that 'where practicable' should be deleted from secondary mitigation for landscape.
- Tree protection should be in accordance with British Standards Institution's BS 5837: 2012 Trees in Relation to Design, Demolition and Construction or its succeeding iteration.
- The supply, storage, handling, and implementation of proposed planting should also include BS 8545:2014+A1:2026 Trees from nursery to independence in the landscape – Code of practice.

Proposed Approach to the ES

Assessment Methodology

9.16 Referring to (10.8.6)

- Pre-commencement and mobilisation works should also be considered.
- Decommissioning effects should be considered.

9.17 Referring to (10.8.9)

- SCC queries the reference to N1 (3), as this could not be verified.
- N4 (3) refers to all special qualities and statutory purposes; tranquillity and darks skies are given as examples. SCC expects that impacts and effects on all special and statutory purposes are qualities will be adequately assessed.

Landscape effects

9.18 (10.8.11) Settlements, local highways, PRoW, and individual Dwellings/ farms would usually be considered visual receptors.

9.19 Landscape receptors comprise the local landscape character, the fabric of the landscape and landscape features, such as woodlands, trees, hedgerows, and ponds.

9.20 SCC therefore considers that Table 10-2 needs to be revised.

9.21 (10.8.12) SCC does not agree that the collective approach set out in this paragraph is proportionate or in line with GLVIA3.

9.22 GLVIA3 states:

- Paragraph 3.16: The level of detail provided should be that which is reasonably required to assess the likely significant effects.

- Paragraph: 3.19: Other than any effects that are considered and eliminated at an earlier point, likely significant effects must be considered in the assessment stage of LVIA.
- Paragraph 3.20: In most cases it will be essential to give detailed consideration to both:
  - effects on the landscape as a resource (the landscape effects); and
  - effects on views and visual amenity as experienced by people (the visual effects).

9.23 Paragraph 3.21: In LVIA there must be identification of both:

- landscape receptors, including the constituent elements of the landscape, its specific aesthetic or perceptual qualities and the character of the landscape in different areas; and
- visual receptors, that is, the people who will be affected by changes in views or visual amenity at different places.

9.24 The effects are identified by establishing and describing the changes resulting from the different components of the development and the resulting effects on individual landscape or visual receptors.

9.25 (10.8.14-10.8.15) SCC considers that the impacts and effects on The Broads National Park and the Suffolk and Essex Coast and Heaths National Landscape and their settings, as well as the Suffolk Heritage Coast, will need to be assessed separately.

9.26 SCC further considers that the impacts and effects need to be assessed for these designated landscapes and their statutory purposes as a whole, rather than just for the parts that fall within the study area.

Visual effects

9.27 (10.8.16) Further information is required on visual receptor groups and their sensitivity.

9.28 (10.8.22) SCC welcomes the consideration that landscapes and seascapes classed to be of lower landscape value may still be highly susceptible to the nature of the proposed change.

Visualisations

9.29 There appears to be no information provided regarding the visualisations, the methodology of producing them, or how they will be presented in the ES.

9.30 SCC considers that a rationale will need to be provided for the type of visualisation suggested for each viewpoint and would welcome a sample page for the visual

assessment pages. A good example for a reader friendly layout would be the Bramford to Twinstead Grid Reinforcement scheme.

Criteria for Determining Visual Value

9.31 While Tables 10-3 and 10-4 are broadly acceptable, SCC considers that in Table 10-5, a greater value should be placed on views that are valued by local people and that this should be included within the medium bracket. What is currently considered of very low value would then become of low value, reserving the very low value to views which are dominated by detracting elements.

Criteria for Determining Visual Susceptibility

9.32 In Table 10-6 further clarification is required on visual receptors for whom the nature of the view is of very low recognised importance.

Impact Magnitude

Magnitude of Landscape Impacts

9.33 (10.8.23) The reference to GLVIA should be paragraph 3.26.

9.34 (10.8.24) Duration and reversibility should also consider at what point a long-term impact or effect becomes permanent (for example after 15 years) and which impacts/effects could be considered temporary.

Magnitude of Visual Impacts

9.35 SCC considers Table 10-8 is broadly acceptable. However, the assessment of visual effects needs to go beyond assessing the selected viewpoints and their visualisations and SCC would welcome further clarification on this point.

Effect Significance

9.36 The distribution of effect significance as shown in Table 10-9 is broadly acceptable.

9.37 SCC welcomes that, where two significance categories are included in one cell, a single category will be assigned and an evidence-based reasoned judgement given for the selection of that category (10.8.30).

9.38 However, the significance threshold needs to be clarified. SCC expects that all effects that are moderate or major will automatically be considered significant. It must further be considered that an accumulation of minor effects can overall become significant.

Nighttime assessment

9.39 (10.8.31) This requires further clarification.

9.40 Firstly, SCC has concerns with regards to the sufficiency of the daytime assessment and the proposals to solely focus on publicly accessible areas (see

also paragraph (10.8.38)). This may not capture all relevant receptors. SCC considers that effects on residential amenity and on wildlife will need to be fully assessed in the ES with regards to topics such as air pollution, noise and vibration, and lighting.

9.41 Secondly, the sensitivity of receptors, which experience night-time effects, is not necessarily the same as during the day, even if they are the same receptors and the same impacts occur. This seems to be addressed in paragraph (10.8.32), but it is unclear how these two approaches are combined.

9.42 Please also see SCC's comments above with regards to paragraph (10.6.4).

9.43 (10.8.33) The assessment should also consider light spill into areas that are not meant to be lit.

Limitations and Assumptions

9.44 (10.8.38) SCC considers that residential amenity and effects on wildlife will need to be fully assessed in the ES with regards to topics such as air pollution, noise and vibration, and lighting, both during the day and during nighttime. Limiting the visual nighttime assessment to publicly accessible areas are unlikely to capture all relevant sensitive receptors that may be affected by lighting in connection with the proposals.

9.45 In addition, SCC considers that the further limitation of nighttime assessments to 1km distance of the project is only acceptable, if it can be demonstrated that no significant effects would occur beyond this distance (for example, as a result of lighting or noise and vibration).

9.46 Please refer to SCC comments above with regards to scoping out, under 10.6.

Summary of Landscape and Visual Scope (Table 10-10)

9.47 Please refer to SCC comments above with regards to study areas and scoping out.

Figures – General comments

9.48 SCC Landscape would prefer if full OS base maps (1:25,000) were to be used.

9.49 For the ES it would be helpful if the figure document titles for the document library could reference which topic area, they relate to, so that it is clear which link needs to be opened.

9.50 It is evident from reviewing the figures that the same scale does not fit all data sets. While some figures require a finer grain (such as the viewpoint maps), others would benefit from a coarser grain (such as National Landscape Character Areas).

9.51 SCC Landscape considers that some figures could be usefully merged, without overloading the content. For example, Ancient, Veteran and TPO trees could be

combined with Ancient Woodlands and Wood Pasture. SCC would be happy to engage with the Applicant in this matter.

9.52 SCC considers that the keys for each figure should remain consistent for all pages (rather than being tailored to the features present on a given sheet) to indicate that a certain feature would be depicted if it were present in this location.

Scoping-Report-Volume-III-Figures-Part-6-of-9.pdf,

Scoping-Report-Volume-III-Figures-Part-9-of-9.pdf

9.53 While the provided maps are very clear for each element (roads, lorry routes, cycle routes, PRoW, etc.), it would be useful to have the various elements on an interactive map, in individual layers so that the interaction between these elements can be more readily understood.

Figure 76-1 International Sites (10km Radius) and Figure 6-2 National and Local Designated Sites (2km Radius)

9.54 Inset location maps require updating/correcting.

Figure 6-3 Notable Habitats Desk Studt Record (500m radius)

9.55 The redline boundary should aim to not only avoid direct impacts on woodlands but also provide appropriate buffers and protective measures to avoid indirect impacts, as far as possible (for example, north of Burgh Road, sheet 3 of 14; in the approach to Saxmundham, sheet 13 of 14).

Figure 10 (1) Landscape Character Areas, Figure 10-2: Landscape Planning Context, Figure 10-3: Visual Receptors

9.56 SCC would ask that the study area be added to the Landscape Character Areas, Landscape Planning Context and Visual Receptors figures.

Figure 10-1 Landscape Character Areas

9.57 This figure depicts the National Landscape Areas (NCA). This should be reflected in the figure title. The scale of 1:25,000 is to 'zoomed-in' for the information provided and not very user-friendly. SCC would welcome the NCAs to be shown on a less granular scale. SCC further considers that there should be additional figures showing the Suffolk Landscape Character Assessment landscape types as well as the types and areas of the Suffolk Coastal, and Waveney District Landscape Character assessments.

Figure 10-2 Landscape Planning Context

9.58 Similarly, this figure would probably be more useful at a less granular scale, providing a better overview.

9.59 The Suffolk Heritage Coast should also be mapped.

Figure 10-3 Visual Receptors

9.60 It would be helpful to have the ZTV as a wash across this figure. With regards to viewpoint locations, SCC considers that a finer scale, on an OS base, should be used to aid easy location of the viewpoints. Viewing cones should be included, indicating the direction and viewing angle at each location.

9.61 SCC queries if there is a timeline to visit the viewpoints that were identified as inaccessible.

9.62 SCC considers that additional viewpoints will likely be required in areas, where above ground infrastructure is proposed (for example, around the proposed reservoirs). SCC would be happy to engage further with the Applicant to agree viewpoints, once more detailed information on above ground structures, potential visibility and mitigation measures becomes available.

Figure 11-3 Geology – Superficial and Figure 11-4 Geology – Bedrock.

9.63 It would be useful to have, in addition to the key, labels on the map, as the colours can be difficult to differentiate.

Figure 15-3 Designated Habitat Sites

9.64 The redline boundary should make every effort to avoid Veteran, Ancient and TPO Trees (for example at Spexhall, sheet 6 of 14; near Bruisyard, sheet 12 of 14)

9.65 Clarification is required as to whether this figure incorporates information from the Revised Ancient Woodland Inventory.

10 Agriculture and Soils

10.1 The risks associated with soil management are highly variable across the different areas of the project. For example, it is reasonable to expect that the impacts of rainfall and management of wet soils is likely to vary across different areas of the project. There are different types of soils within the Order Limits such as sandy soils towards the east coast and clay soils elsewhere, each of which require bespoke mitigation measures to prevent long-term impacts. Specific assessment of impacts on peaty soils is necessary and Natural England's mapping of its presence should be consulted[14].

10.2 On some parts of the site, soils will be moved and stored for long periods of time. Elsewhere, soils storage will be much more short-term. These differences also have implications for impacts on soils and what best-practice soil management techniques are necessary for adequate mitigation. Clarity should also be provided on the applicant's approach to soil storage as best practice requires that soils

[14] https://naturalengland.blog.gov.uk/2025/05/12/a-new-peat-map-for-england/

must be stored on site and so there must be sufficient space within the Order Limits for proper soil storage after account for constraints such as existing vegetation and presence of archaeology. Insufficient space can lead to stockpiling of topsoil too high which leads to oxygen deprivation for the living microorganisms within the soils which would nullify its ability to facilitate agricultural crops. Therefore, the applicant should demonstrate that best practice will be followed in accordance with DEFRA's guidance in the Outline Soil Management Plan[15] submitted with the application.

10.3 The depth of the pipeline should ensure that on all soil types of agricultural land can be returned to its original use including cultivation at depth where required. The Council notes that the pipeline buried using open-cut methods will be buried at a depth of between 0.9m and 1.2m in paragraph 2.4.14. This may compromise certain agricultural activities and so burial depths should be examined and discussed with landowners to avoid this. All restoration of agricultural land should ensure that the soils are fully capable of returning to its former agricultural use and any potential future agricultural use as informed by the landowner.

11 Public Health

Methodology

11.1 SCC (Public Health) is not satisfied that all determinants proposed to be scoped out are supported by sufficient baseline evidence or assessment justification. Where a plausible pathway to population health, wellbeing or health inequality effects remains, SCC considers the relevant determinant should remain scoped into the assessment, representing a precautionary and comprehensive approach.

11.2 Whilst the Human Health methodology is broadly considered to be of an acceptable technical standard, its robustness is dependent on the adequacy of the baseline evidence, the identification of vulnerable populations, and the appropriateness of the subsequent scoping decisions.

11.3 At present, SCC considers the baseline evidence and the rationale underpinning a number of scoping decisions to be insufficiently evidenced, limiting confidence that potentially relevant health pathways can be discounted.

Health Baseline

11.4 Paragraph 18.4.2 identifies Census data, OHID profiles, the Indices of Multiple Deprivation, amongst others. These are considered appropriate core sources, and the inclusion of the Suffolk Joint Strategic Needs Assessment is welcomed.

[15] https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites

11.5 It is important that the baseline is sufficiently detailed to support decisions about population sensitivity and whether individual determinants can safely be excluded. A number of notable population characteristics are absent from the baseline, which SCC consider important to understanding potential impacts. The baseline does not include:

- key elements of mental health, such as rates for diagnosed depression and severe mental illness
- substance misuse
- neurodivergent people
- physical activity among children and young people, and older people
- digital exclusion (in respect to engagement)

11.6 Furthermore, SCC consider that the baseline methodology for the ES should extend beyond the desk-based studies identified at paragraph 18.4.2 to include targeted and proportionate primary data collection. Such intelligence could both strengthen the baseline evidence and provide indicators that could be monitored throughout the phases of the project, aiding identification of changes in health determinants and informing mitigation and adaptive management. Using a contextual example of access to services and community assets, SCC consider it important to observe any measurable changes in engagement with mental health services that may be associated with project related effects, missed medical and care appointments that may be associated with traffic disruption, or reductions in the use of community and voluntary sector services. This data may provide insight into emerging wellbeing impacts, including unmet need, social isolation, or barriers to access.

Study areas and assessment guidance

11.7 Paragraph 18.2.7 explains that a 500-metre study area is to be used for pipelines and Mains sections following professional judgement and National Highways' DMRB LA 112 guidance, with a two-kilometre study area for the AWRP, LSO, CSR, and WSR.

11.8 DMRB LA 112, as recognised in the report, was designed for Highways schemes and whilst it is not considered inherently inappropriate for the proposed project, it should not be treated as establishing a universally appropriate fixed distance for a geographically extensive water infrastructure scheme.

11.9 SCC does not therefore object in principle to the proposed 500 metre and two-kilometre study areas as initial screening areas. However, these distances should not operate as firm limits. The health study area should be extended wherever relevant pathways extend further, including along construction traffic routes and diversions, affected public transport and community transport routes, PRoWs,

access routes to healthcare and social infrastructure, noise and air quality zones of influence, and areas experiencing cumulative effects from other projects.

11.10 This would avoid a situation in which a population is omitted because it is more than 500 metres from the Order Limits even though it lies on a construction traffic route or depends upon a route, facility or green space affected by the Proposed Development.

11.11 Paragraph 18.2.10 states that "the study areas will be refined throughout the evolution of the Proposed Development." SCC accepts that refinement may be appropriate as the design and evidence base develop, however any material refinement to the study areas, particularly where it results in a reduction in the area assessed for a determinant, should be clearly justified and evidenced within the ES, including the rationale for concluding that potential health effects outside the revised study area have been appropriately considered.

Consultation, community engagement, and wellbeing

11.12 SCC have a Community Engagement and Wellbeing Supplementary Guidance Document[16] that includes principles to inform engagement, assessment, and mitigation.

11.13 The Council's guidance states that promoters should consider impacts on community wellbeing "both alone and in combination with other proposals, during all phases of the project, from the earliest stages of the pre-application period, through consenting, and during construction." It also expects mental health, and wellbeing impacts to be assessed in the EIA and identifies effective engagement as part of safeguarding community wellbeing.

11.14 This is relevant to paragraph 18.3 and to the proposed assessment of community resilience, influence, identity, and participation. Engagement should not be treated solely as a procedural account of consultation undertaken. The ES should explain how engagement evidence has informed the identification of affected groups, pathways, design changes, mitigation, and monitoring.

11.15 The assessment should also recognise that online methods may not reach all affected residents. The baseline should inform the use of accessible, non-digital and targeted methods where communities include older people, disabled people, people with limited health literacy or households at risk of digital exclusion.

Disability, long term conditions, and local variation

11.16 Paragraphs 18.4.11 and 18.4.12 identify comparatively high levels of disability and long term physical or mental health conditions. This supports a more detailed breakdown to distinguish, between mobility limitation, sensory impairment,

[16] https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf

learning disability, mental health conditions, and other long-term conditions relevant to sensitivity or adaptation.

11.17 A single aggregated disability or long-term condition measure may conceal different pathways. For example, a person with limited mobility may be particularly affected by a longer or inaccessible PRoW diversion, whilst a person sensitive to changes in routine or environmental stimuli may be particularly affected by unpredictable construction activity, noise, or altered access arrangements.

Mental health and wellbeing

11.18 Paragraph 18.7.3 refers to the World Health Organisation definition of health, encompassing physical health, mental health, and social wellbeing. Public Health supports that definition, but it should not be used as a substitute for identifying and assessing specific mental health pathways.

11.19 As mentioned above, the baseline omits data relating to population mental health. It will be important that the ES include and clearly identify all relevant data to inform the assessment, bringing together, rather than cross referencing separate technical chapters, the potential consequences of:

- prolonged uncertainty and loss of perceived control
- noise, vibration, artificial lighting, and sleep disturbance
- traffic, congestion, severance, and additional journey time
- temporary or prolonged restrictions on PRoW and associated recreation
- reduced or disrupted access to green and blue space
- concerns about water quality, contamination, flooding, or safety
- changes to landscape, sense of place and community identity
- disruption to social interaction, participation, and support networks
- cumulative exposure to this and other major infrastructure projects
- economic uncertainty, disruption to local businesses and livelihoods, and the associated financial and psychosocial impacts on business owners, employees, and affected communities

11.20 Paragraph 18.4.76 recognises several of these pathways, we particularly welcome this.

11.21 Paragraph 18.7.8 recognises that the assessment will be primarily at population level. Population level assessment should not obscure groups whose sensitivity differs materially from the general population. Specifically, neurodivergent people should be included within the identification of potentially vulnerable groups where relevant to sensory disturbance, predictability of routine, clear communication,

accessible engagement and changes to familiar routes or environments. The purpose should be to identify proportionate and inclusive mitigation, not to assume that all neurodivergent people will experience the same effect.

11.22 SCC note that Chapter 15 (Air Quality and Odour) includes a proposed assessment of odour effects, with paragraph 15.2.11 setting out the odour study area and paragraphs 15.8.43 to 15.8.49 describing the proposed odour assessment methodology. SCC considers that odour has the potential to influence wellbeing, residential amenity and quality of life and therefore supports the applicants approach that odour effects are assessed, across construction, operation, and decommissioning. Any residual odour effects identified through the Air Quality and Odour assessment should be appropriately reflected within the Human Health assessment.

11.23 SCC considers that mental health and wellbeing should be assessed as a specific and identifiable outcome across all relevant determinants scoped into the assessment, rather than being considered implicitly through a general or holistic approach to health. The assessment should clearly explain how each relevant determinant may influence mental health and wellbeing, including effects arising from uncertainty, disruption, changes to access and amenity, community identity, social participation, recreation, economic impacts, and cumulative exposure to multiple infrastructure projects.

Health related behaviours - physical activity and access to open space

11.24 Public Health does not support the proposed exclusion of physical activity from all phases. As detailed above, physical activity among children and young people, and older people is absent from the baseline. For context, data from Suffolk JSNA[17] shows that 42.5% of children and young people aged 5 to 18 meet the Chief Medical Officers' recommendations compared with 49.1% in England, highlighting sensitivity.

11.25 The construction phase presents a clear pathway through potential disruption to PRoW, recreational routes, green and blue spaces, active travel opportunities, severance, loss of amenity and perceived safety.

11.26 Paragraph 18.4.34 identifies poorer accessibility to green space in parts of the health study area. Paragraph 18.4.31 additionally records that "The most common method of travel to workplace in the health study area is driving a car or van". These findings indicate potential sensitivity rather than the absence of a pathway. Greater car dependence may mean that disruption to road routes has substantial access implications, whilst it may also indicate that walking and cycling

[17] https://app.powerbi.com/view?r=eyJrIjoiZTEzYzg0MWQtMTEyYi00YWZmLTg1ZGQtMGM1ZDA4NGNkMzZkIiwidCI6IjEwOWM2YWVjLTUwNDYtNGE5NS04ZjNjLTg0ZjYzYmExOGFmNCJ9

opportunities are already constrained. The question for the EIA is whether construction, diversions, severance, loss of amenity or perceived safety could reduce walking, cycling, recreation or access to the limited opportunities that do exist.

11.27 Whilst operational effects may be more limited than during construction, the Proposed Development includes permanent facilities and operational footprints that may continue to influence access, perceptions of place, landscape character, amenity, and the attractiveness of recreational environments. For example, paragraph 2.5.6 states that the AWRP is expected to operate "24 hours a day, 7 days a week". SCC therefore consider that a plausible pathway remains whereby operational activities and permanent changes to the environment could influence participation in recreation and physical activity.

11.28 Similarly, decommissioning activities have the potential to recreate many of the same pathways identified for construction, including temporary disruption to access routes, recreational spaces, and the wider public realm. Whilst the nature and duration of effects may differ, SCC do not consider it appropriate to assume at this stage that physical activity effects can be excluded from the decommissioning phase.

Health related behaviours – risk taking behaviour & diet and nutrition

11.29 There is a relationship between mental wellbeing and health related behaviours. Paragraph 18.4.76 recognises that “major infrastructure developments can influence mental health and wellbeing through changes in community resilience, perceived control and ability to influence decision making “. Given this recognised pathway, SCC considers it plausible that behavioural responses may vary across individuals and communities throughout all phases of the project. In turn, psychosocial stress, disruption to daily routines and where relevant, financial pressures arising from project related circumstances may influence health related behaviours, including dietary choices and risk-taking behaviours. For example, changes in household financial circumstances may affect the affordability and accessibility of healthier food options, whilst disruption to routines and mental wellbeing may influence risk taking behaviours such as smoking and alcohol consumption. As these represent plausible pathways to population health and health inequality effects, SCC considers that risk taking behaviour and diet and nutrition should remain scoped into the assessment.

Economic determinants and balanced assessment

11.30 SCC considers that paragraphs 18.4.98 to 18.4.100 do not provide a balanced account of both beneficial and adverse pathways. Employment, apprenticeships, training, and supply chain opportunities may support health through income, financial security, skills, and self-efficacy. Conversely, congestion, additional

journey time, disruption to existing businesses, competition for labour and accommodation, or unequal access to project benefits may adversely affect wellbeing or widen inequalities. Any negative Economic impacts may be felt most acutely by small and medium sized enterprises. The assessment should therefore consider the potential health and wellbeing implications arising from both positive and negative economic effects.

11.31 SCC recognise that operational employment and income and education and training impacts are likely to be more notable during construction. However, the conclusion that these determinants can be scoped out of operational, and decommissioning is not considered warranted. Whilst the magnitude of effects may differ from the construction phase, operational activities may still generate employment, supply chain, skills, and training opportunities, whilst adverse effects on local businesses, labour availability or access to economic opportunities may also persist. Similarly, decommissioning activities have the potential to create both beneficial and adverse economic effects through temporary employment, procurement activity, business disruption, and changes in accessibility. As such, a plausible pathway to health and wellbeing effects remains beyond construction. Employment, income, training, and education are recognised determinants of health and wellbeing, and their potential influence should not be overlooked. SCC consider that these impacts should be scoped in for all phases of the project.

Social environment

11.32 Public Health accepts that community identity, culture, resilience, and influence; social participation, interaction and support pathways are likely to be strongest during pre-app and construction and that reinstated underground pipelines may have limited operational effects.

11.33 However, operation of the permanent AWRP, CSR, WSR and associated infrastructure could continue to affect landscape character, perceptions of place, amenity, trust, community safety, or perceived environmental risk. The applicant should therefore not exclude “community identity, culture, resilience and influence; social participation, interaction and support” across the operational phase.

11.34 A component specific assessment is considered appropriate. Operational pathways may be excluded for individual underground pipeline sections where land is fully reinstated and no pathway remains but should be retained for permanent above ground development and any continuing access, amenity, noise, odour, lighting, visual or risk perception effects.

11.35 A similar approach is required for decommissioning. Whilst the nature, scale and duration of effects may differ from construction, decommissioning activities have

the potential to give rise to many of the same health determinants and pathways already identified within the assessment, including effects on access, community wellbeing, participation, amenity, perceptions of place and other wider determinants of health. SCC therefore consider that these determinants should be assessed proportionately for decommissioning rather than omitted from the assessment.

11.36 SCC also note the proposal to scope out housing, community safety, and transport modes and connections during decommissioning. Whilst the rationale for excluding housing during decommissioning may be more readily understood, SCC consider that plausible pathways remain for both community safety and transport modes and connections. Decommissioning activities have the potential to generate construction type effects including temporary traffic movements, access restrictions, route diversions, and changes to perceptions of safety. Given these pathways are recognised elsewhere within the assessment, SCC do not consider their exclusion from the decommissioning phase to be sufficiently justified at this stage and recommend they remain within scope.

Institutional and built environment

11.37 Public Health does not support a complete exclusion of health and social care services and relevant built environment effects during operation and decommissioning.

11.38 Operational maintenance, emergency works, tanker and chemical deliveries, washouts and other activities could also affect routes or services, even if intermittently. Paragraph 2.5.7 identifies chemical deliveries and weekly sludge removal tanker visits, whilst paragraph 2.5.18 states that operational maintenance activities associated with the pipelines will be described and assessed in the ES. The health assessment should therefore consider whether routine or foreseeable non-routine operational activity could affect access to health, social care, or other essential infrastructure. Where the applicant concludes that no significant pathway remains for a particular component, this should be demonstrated using the operational traffic, maintenance and emergency modelling and arrangements.

11.39 Decommissioning should also remain scoped in. Paragraph 2.6.2 contemplates removal of the AWRP, CSR and WSR and paragraph 2.6.4 acknowledges that decommissioning effects may resemble construction effects. Access to essential services, emergency response capacity and temporary pressure on community infrastructure should therefore be assessed for the realistic, worst case decommissioning scenario.

12 Public Rights of Way

12.1 Suffolk County Council Public Rights of Way Team recognises the strategic importance of the proposed SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE PROJECT (SWRTS**)** project and notes that the preferred options remain at an early stage of development.

12.2 Given the extensive linear nature of the pipeline corridors and the proposed reservoir sites, the project has significant potential to affect Public Rights of Way, permissive routes, informal recreational access, and National Cycle Network routes during both construction and operation.

12.3 The Environmental Impact Assessment should therefore include a dedicated assessment of impacts upon public access and Public Rights of Way.

Matters that should be scoped into the EIA

Comprehensive PRoW Baseline

12.4 The ES should identify and map:

- All Public Footpaths.
- Public Bridleways.
- Restricted Byways.
- Byways Open to All Traffic.
- National Cycle Network routes.
- Permissive paths.
- Open access land where relevant.
- Long-distance recreational routes affected by the scheme.

12.5 This should cover both direct land take and adjacent routes potentially affected by construction activities.

Construction Effects

12.6 The project documentation specifically references crossings of Public Rights of Way on several corridors.

12.7 The EIA should assess:

- Temporary closures.
- Diversions.
- Restrictions on access.
- Severance effects.
- Loss of connectivity.

- Construction traffic impacts on users.
- Safety implications at crossing points.
- Impacts arising from trenchless crossing compounds.
- Compound placement adjacent to PRoW.

Public Access Around Reservoir Sites

12.8 The proposed Central Service Reservoir and Western Service Reservoir locations may affect existing rights of way and recreational users during construction and operation.

12.9 The assessment should consider:

- Existing PRoW connectivity.
- Construction access routes crossing or sharing PRoW.
- Temporary and permanent effects on recreational use.
- Opportunities to retain access during construction.
- Opportunities to create and enhance the PRoW network.

National Cycle Network

12.10 The document identifies crossings of National Cycle Network routes.

12.11 The EIA should assess:

- Construction disruption.
- User safety.
- Temporary route diversions.
- Duration of impacts.
- Quality and accessibility of any alternative routes.

User Experience and Amenity

12.12 The assessment should extend beyond legal route availability and consider:

- Noise.
- Dust.
- Visual intrusion.
- Construction compounds.
- Plant and machinery movements.
- Temporary fencing.

- Lighting.

12.13 These can materially affect enjoyment and usability even where routes remain open. The British Horse Society has good guidance on construction near to Bridleways and horses. https://www.bhs.org.uk/media/e0jd440c/construction-0626.pdf

Accessibility

12.14 Any temporary diversions should:

- Be available before closures occur.
- Be safe and convenient.
- Be accessible for users with mobility impairments were reasonably practicable.
- Maintain continuity for equestrians and cyclists where existing rights permit.
- Be at least commensurate with the existing use or better.

Cumulative Effects

12.15 Particular attention should be given to cumulative impacts arising from other major infrastructure projects referenced in the document including, but not limited to:

- Sizewell C.
- LionLink.
- EcoPower Suffolk Solar.
- Chediston Solar Farm.
- North of Lowestoft Garden Village.

12.16 The cumulative effect of multiple schemes on the recreational network and countryside access should be assessed.

Opportunities for Enhancement

12.17 The PRoW Team would encourage the applicant to identify opportunities for:

- Permanent route improvements.
- Surface upgrades.
- Improved accessibility.
- Additional links to address existing severance.
- New multi-user routes where practical.
- Green infrastructure integration around reservoir sites.

12.18 Given the scale of the project and its widespread footprint, opportunities for enhancement should be considered as part of the project's legacy.

Site specific comments for preferred sites and pipeline corridors

Advanced Water Recycling Plant

- 3.2 – Lound Footpath 006 and 007 runs around and through the site.
- 3.3 In Norfolk and so SCC will not comment.

Central Service Reservoir

- 3 - Walpole Footpath 016 runs to the north of the proposed site.
- 4 – Sibton Bridleway 006 runs on the eastern boundary with Walpole Footpath 016 runs to the north of the proposed site.

Western Service Reservoir

- 9 – Brome footpaths 008 and 010 are in close proximity to the location of the proposed reservoir.

Advanced Water Recycling Plant to River Waveney (A-W) Pipeline Corridor

- A-W3 aka Pipeline Corridor 3 crosses many PRoWs and promoted trails some long distance. https://www.discoversuffolk.org.uk/explore-suffolk/ https://www.discoversuffolk.org.uk/promoted-trails/angles-way/
- https://eastsuffolklines.co.uk/walks
- For example: The Angles Way, Waveney Valley Walks and East Suffolk Lines.

Specific Information Request

12.19 The PRoW Team requests that future consultation and EIA submissions include:

A. A Rights of Way Constraints Plan.

B. A Schedule of all affected PRoW.

C. Details of proposed crossings.

D. Temporary Closure and Diversion Strategy.

E. Construction Traffic Management information relating to PRoW users.

F. Public Access Management Plan.

G. Assessment of cumulative recreational impacts.

H. Details of proposed access enhancements and legacy benefits.

Recommended Conclusion

12.20 Suffolk County Council Public Rights of Way Team raises no objection in principle to the scheme at EIA Scoping stage. However, given the extensive linear nature of

the works and the number of Public Rights of Way and recreational routes likely to be affected, the Environmental Statement should include a dedicated Public Rights of Way, Access, and Recreation assessment. This should assess direct, indirect, temporary, permanent, and cumulative impacts on the rights of way network and set out appropriate mitigation, diversion, management, and enhancement measures to ensure that public access is maintained and improved wherever possible.

13 Cumulative effects

13.1 The Council is concerned with the proposed search area and criteria for cumulative developments. The criteria for cumulative developments given in paragraph 23.4.4 of a 5km Zone of Influence area (ZoI) from the proposed Order Limits appears arbitrary, lacks justification and does not reflect the identified zone of influences for impacts as divided by impact area. For instance, table 23-2 identifies that impacts may be felt within 10km of the Order Limits. Moreover, traffic and transport impacts will diffuse across the local road network and strategic road network, which is already being impacted by cumulative developments, and so cumulative impacts may extend beyond the proposed ZoI.

13.2 The other criteria from paragraph 23.4.4 appears problematic; namely, only development >50 units and 10,000m2 of commercial floor space are considered. This does not reflect the rural nature of the location of the project, where substantial agricultural development is commonplace and may contribute to cumulative impacts. Such development can cause substantial movements of agricultural vehicles and so should be considered. The Council understands that the relevant district councils would be able to provide this information and their respective planning portals should be consulted to consider what development of this nature should be included in the cumulative effects assessment. Minerals and waste developments are also not covered by these criteria but also require consideration in the cumulative effects assessment.

Rishabh Rai

From: info@tarchoninterconnector.com
Sent: 07 September 2026 16:51
To: Suffolk WRTS
Subject: Re: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

You don't often get email from info@tarchoninterconnector.com. Learn why this is important

Dear Rishabh,

Thank you for your email.

Based on the information provided, and our initial review of the proximity of the proposed development to the planned Tarchon Interconnector Project, it does not appear that there are any visible links of concern between the two projects at this stage.

We would be grateful if you could clarify whether the Applicant anticipates any onshore construction-related works, or the transfer of construction and maintenance equipment, taking place through the Tendring area as part of the proposed development.

If all works are expected to be retained within Suffolk, and there is no anticipated interaction with the Tendring area, then it is unlikely that the Tarchon Interconnector Project would have any further comments to make at this stage and could be discounted as a consultee.

Thank you for noting the issue with the previous email address. Please use this email address for any future correspondence relating to the Tarchon Interconnector Project.

Kindest regards,

[redacted]
Stakeholder Relations for the Tarchon Project

TARCHON

Email: info@tarchoninterconnector.com
Address: Freepost TARCHON ENERGY
Tel: +44 (0)3 303 010079
Web: www.tarchoninterconnector.com

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: Friday, September 4, 2026 3:59 PM
To: info@tarchoninterconnector.com <info@tarchoninterconnector.com>
Subject: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

THRANDESTON PARISH COUNCIL

Suffolk Water Recycling Transfer and Storage

This is the response of Thrandeston Parish Council to the Scoping Report (the Report) submitted by Essex and Suffolk Water Limited (the Applicant) to the Planning Inspectorate. This response was agreed by a meeting of Thrandeston Parish Council (the Parish Council) on 24 September 2026.

The Parish of Thrandeston covers the Village of Thrandeston and the area referred to by the Applicant as Great Green to the north east of the Village. For the sake of clarity this terminology will be adopted in this response. The Parish is impacted by two principal components: the proposed Western Service Reservoir (WSR) and the proposed Eastern Distribution Mains. The study areas inevitably overlap and the Parish Council has found it difficult in some instances to establish what parts of the Parish fall inside the study areas for each component. The Parish Council would ask that where there is any doubt on the issue there be a presumption in favour of including the wider area.

Unless otherwise indicated references are to Volume 1: Main Report.

Introduction

1. Figure 1-3 Sheet 10 of 14 shows the proposed site for the WSR and also the proposed Eastern Distribution Mains.
    i. Arrows indicate six possible sites for the WSR. In the Preferred Options Announcement published July 2026 the Applicant stated that a site to the east of the A140 (in previous documentation referred to as WSR9) is the preferred option for a variety of reasons, not least its proximity to the A140. It is unclear therefore why the other sites are shown on Figure 1-3. The remainder of the Report is written on the basis that the WSR will be located to the east of the A140. The Applicant is asked to clarify this in the Environmental Statement (ES).
    ii. Some areas appear to be excluded (by way of example three parcels of land to the north of the word ‘Yaxley’ on the Figure). The significance of these is unclear and does not appear to be explained anywhere in the Report. The Applicant is asked to clarify this in the ES.

EIA Methodology

2. 3.3.20 states that pre-construction activities associated with the Proposed Development are proposed to be scoped out of assessment in the ES. The projected list of proposed pre-construction activities includes, amongst others, above-ground site preparation for temporary facilities for the use of contractors, receipt and erection of construction plant and equipment, and installation of pre-site drainage, including pipework and outfalls. All of these activities will lead to an increase in traffic and possibly noise. The Parish Council has concerns about this and asks that these activities be scoped in. In a quiet rural area such as Thrandeston Parish any increase in traffic has a considerable impact. The roads within Thrandeston Village and Great Green are single track with limited passing places. This is particularly important as at present the scoping area for the Eastern Distribution Main is extensive.

Terrestrial Biodiversity

3. Table 6-5 provides a summary of priority and irreplaceable habitats within 500m of each section of the EIA Scoping Area that have been identified from desk-based study data. The Parish Council notes that the Table includes Traditional Orchards but would ask the Applicant to ensure that the data relied upon is accurate with reference to DEFRA'S MAGIC map. Of particular note is Home Farm Orchards. The orchards are managed as UK Priority Habitat Traditional Orchards and in June 2026 were awarded National Plant Collection status. The Collection includes over 500 varieties of apple, pear, cobnut and plum, and is being expanded to include other fruit and nut species.

Landscape and Visual

4. 10.6.1 says: 'Landscape features such as ancient woodland, veteran trees and trees subject to tree preservation orders ('TPOs') located at distances of greater than 15m from the Order Limits are proposed to be scoped out of the assessment in the ES, as it is unlikely that the root protection zones of these will be directly impacted by the Proposed Development's construction, operational or decommissioning activities.' Whilst noting that the 15m buffer is accepted standard it should be noted that the Root Protection Area for ancient and veteran trees is 15 x the diameter or 5m beyond the canopy whichever is the greater. In the light of this the Parish Council asks the veteran trees within the hedges be properly assessed. Some of the hedges within the Parish have a heritage/cultural as well as biological value.

5. 10.6.2 deals with hedgerows and says: 'For proportionality, the assessment of impacts on individual hedgerows is proposed to be scoped out of the assessment and instead, the ES would assess the Proposed Development's likely significant effects on hedgerows collectively.' The Parish Council does not accept that this approach is correct and asks that a proper assessment be carried out on those hedgerows which will be impacted by the Proposed Development. The Hedgerows Regulations 1997 set out the criteria for determining 'important' hedgerows of which there are many examples across the Parish. These are located at The Marsh, around Goswold Hall and adjacent to single track lanes. The Parish Council has in its possession a map prepared by a resident of the most significant trees in the Village almost all of which were on the hedges along the single-track lanes. These include pollard ash trees, once pollarded oak trees, old hedge maples and white willow. This map can be made available to the Applicant.

Terrestrial Historic Environment

6. 11.4.40 deals with Designated Heritage Sites within the study area of the proposed WSR.
    i. It is difficult to reconcile this paragraph with Figure 11-1 sheets 29-31. The Figure includes the Thrandeston Conservation Area in its entirety whereas 11.4.40 seems to say that only part of the Conservation Area is included. This also links to the point made at 1ii above as some listed buildings within the study area would appear to be excluded. This is important and requires clarification. There are 14 listed buildings within the Thrandeston

Conservation Area including the Grade I listed Church and Grade II* listed Manor House.

ii. There is a typing error in this paragraph which is repeated elsewhere in the Report which should be corrected. Blackley should read 'Blakely'.

7. 11.4.43: It is assumed that the reference to 'Botswold Hall' should read 'Goswold Hall'.

Traffic and Access

8. 13.4.19 and 13.4.20 deal with the public rights of way (PRoW) network and states that baseline data will be collected for affected parts of the network to inform the assessment of impacts. The Parish Council is aware that work to collect the baseline data has commenced and that in collecting this data permissive footpaths which run close to PRoW are being ignored. The Parish Council is of the view that this gives a distorted picture of the use of footpaths across the Parish.

Noise and Vibration

9. 14.4.29 states that the proposed Eastern Distribution Mains section of the EIA Scoping Area contains residential areas of Mellis, Brome and Yaxley but fails to mention Thrandeston and Great Green. Figure 1-3 sheet 10 of 14 clearly shows that properties within Thrandeston and Great Green fall within the Scoping Area. The Parish Council asks that this error be corrected.

Socio-economics

10. Table 17-20 lists businesses within 500m of the proposed Eastern Distribution Mains section of the EIA scoping area. The list does not include working farms within the Area, BCP Scaffolding and Safety Netting which operates from Church Farm, Little Green, and holiday accommodation in the Area. Old Wood Hall, Great Green, has recently been granted permission for the change of use of an outbuilding to allow holiday let use. The Parish Council submits that the list in Table 17-20 is incomplete and asks that the Applicant revisits it.

Human Health

11. Table 18-14 details the preliminary sensitivity of the proposed WSR study area to changes in health determinants.
    i. Thrandeston Village Hall is omitted from the table.
    ii. Thrandeston Church should be corrected to St Margaret's not St Mary's.

12. Table 18-26 details the preliminary sensitivity of the proposed Eastern Distribution Mains study area to changes in key health factors.

    i. Thrandeston Village Hall is omitted from the list of community facilities.
    ii. Thrandeston Church should be corrected to St Margaret's, not St Mary's.
    iii. Reference is made to residential receptors within the villages of Brome, Mellis and Yaxley. There is no reference to the village of Thrandeston or to residential receptors there or in Great Green.

13. 18.4.76 states: ‘Consultation with stakeholders has highlighted that, within Suffolk, communities are currently experiencing sustained exposure to multiple NSIPs. In this context, although not an NSIP, the Proposed Development may contribute to ongoing experiences of change and uncertainty and may reinforce perceptions of reduced influence over aspects of the local environment and future community conditions.’ The reference to the Proposed Development not being an NSIP is confusing and should be clarified. The impact of sustained exposure to multiple NSIPs identified by the Applicant cannot be understated. The Parish Council asks that throughout the progress of this Application the impact on physical and mental health be given full and proper consideration.

Major Accidents and Disasters

14. Table 22-5 lists major event categories proposed to be scoped out of the ES. As currently drafted, this includes wildfires. It is assumed that in the light of recent events at Dunwich Heath and elsewhere these will be scoped in. The Parish Council wishes to inform you that the Thrandeston, Yaxley and Wortham area has been subject to wildfires in recent years.

Cumulative Effects Assessment

15. 23.4.4 states that in identifying the long list of cumulative schemes only those developments larger than 50 units or 10,000m^2 of commercial floorspace have been included. The Parish Council is of the view that this approach is not appropriate for rural areas where smaller developments can have a significant impact on the road network and on the environment more generally. The cumulative effects of a number of small developments should not be overlooked. By way of specific example DC/25/005523 Poultry Houses Thrandeston Road Brome and Oakley Suffolk is currently not included in the long list. The proposed site is to the north of 45 on Figure 23-2 sheet 8 of 11. If granted the Application would have a considerable impact on traffic movement in the vicinity of the proposed WSR and Eastern Distribution Mains and on noise in the area.

16. Figure 23-2 sheet 8 of 11 (to be read in conjunction with Appendix 23-1) illustrates those cumulative schemes within a 5km radius of the EIA scoping area.
    i. Number 5 represents EcoPower Suffolk. The placement of the number on the Figure is misleading. Thrandeston sits at the centre of the EcoPower Suffolk project and is in close proximity to the heaviest concentration of permanent industrial infrastructure in the scheme. The Proposed Development includes a proposal for a BESS, substation and associated infrastructure between Mellis and Thrandeston, a cable corridor from the BESS linking to other parts of the scheme to the north and east of Thrandeston, and solar racks in Great Green. All of these elements will impact the Parish.
    ii. At 1.2.2. objective 1 of the Proposed Development is: ‘To meet the urgent need to increase the supply of potable water to Hartismere Water Resource Zone (‘WRZ’).’ At 16.6.1 in the context of climate change considerations the Applicant accepts that the Proposed Development may enable the lifting of the existing moratorium on the provision of new non domestic water supply in

the vicinity of the EIA Scoping Area leading in time to new commercial development being built and occupied.
Whilst accepting that the exact nature of future developments cannot at this stage be identified the Parish Council would ask the Applicant to consider future developments as part of the cumulative effects assessment. The building of the Yaxley 132kV/400 kV National Grid Substation is a clear example of how one development leads to further development. The Substation has attracted a number of applications for BESS schemes, solar and related infrastructure projects. Taken with the Norwich to Tilbury 400 kV overhead upgrade the impact on this quiet rural area is already considerable. The Parish Council is concerned that the WSR will similarly attract further developments. The Parish Council asks that the Applicant looks realistically at the impact of the Proposed Development on Thrandeston Parish when taken with known and future developments.

If further information is required, please contact the Parish Clerk.
Email: clerk@thrandestonparishclerk.org
Phone: 07958 623897

Rishabh Rai

From: [redacted]@trinityhouse.co.uk>
Sent: 28 September 2026 14:41
To: Suffolk WRTS
Cc: [redacted]
Subject: FW: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification
Attachments: WA0210003 Letter to stat cons_Scoping & Reg 11 Notification.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: EST

> You don't often get email from [redacted]

Good afternoon Claire,

I can confirm that Trinity House is content with the Scoping Report. However, when the applicant carries out its Navigation Risk Assessment on works below the high water mark, Trinity House would be happy to provide expert marine input at that time.

Kind regards,

[redacted]
Navigation Services Manager | Navigation Directorate | Trinity House
[redacted]@trinityhouse.co.uk | [redacted]
www.trinityhouse.co.uk

TRINITY HOUSE

From: Suffolk WRTS <SuffolkWRTS@planninginspectorate.gov.uk>
Sent: 09 September 2026 11:07
To: Navigation <navigation.directorate@trinityhouse.co.uk>
Cc: [redacted]@trinityhouse.co.uk>
Subject: RE: WA0210003 - Suffolk Water Recycling Transfer and Storage - EIA Scoping and Consultation and Regulation 11 Notification

Suffolk Water Recycling Storage and Transfer Project – Amendment to deadline for receipt of scoping request responses

With respect to the above consultation and our letter of the 2 September 2026, please note that the 28-day deadline was incorrectly stated on the correspondence.

The correct 28-day deadline for receipt of responses is the **2 October 2026.**

Ubbeston Parish Council – Response to Environmental Impact Assessment Scoping Opinion Consultation

Suffolk Water Recycling, Transfer and Storage Project

Dear Sir/Madam,

Ubbeston Parish Council welcomes the opportunity to comment on the Environmental Impact Assessment (EIA) Scoping Opinion for the Suffolk Water Recycling, Transfer and Storage Project. The council wishes to make representations on the following topics, which reflect the environmental sensitivities and community concerns within our parish.

1. Ecology and Biodiversity

Ubbeston supports a diverse range of rural habitats including hedgerows and ecologically valuable field margins. The council requests that the Environmental Statement (ES) includes:

- Full ecological surveys along any pipeline corridor or construction access routes that may pass near the parish.
- Assessment of impacts on protected species known to be present in the wider area.
- Consideration of hedgerow removal and disturbance to habitats during construction.
- Clear proposals for biodiversity net gain, including reinstatement of hedgerows.

2. Traffic and Transport – Construction Traffic and HGV Movements

Ubbeston is served by narrow rural lanes with limited passing places. The council is concerned about the potential impact of construction traffic and HGV movements associated with pipeline installation and reservoir construction. The ES should therefore include:

- A detailed Construction Traffic Management Plan identifying expected HGV volumes, routing, peak periods, and access points.
- Assessment of road safety risks on rural roads and lanes within Ubbeston and the wider area.
- Identification of sensitive locations including residential clusters and areas with restricted visibility.
- Measures to prevent rat-running or inappropriate diversion of construction traffic through Ubbeston
- Consideration of cumulative traffic impacts with other major projects in the region.

The council welcomes clear mitigation to minimise disruption and ensure safe operation throughout the construction period.

3. Noise and Disturbance During Construction

Ubbeston is a quiet rural parish. The ES should assess:

- Construction noise and vibration from trenching and pipeline installation,
- The duration and intensity of disturbance, including any requirement for extended working hours.

- Impacts on nearby residential and business properties and community spaces.
- Measures to minimise noise, vibration, and general disturbance, particularly during early mornings and evenings.

4. Landscape and Visual Impact

The parish lies within a scenic rural landscape. The ES should include:

- Assessment of visual impacts from any above ground infrastructure.
- Consideration of effects on rural landscape character and tranquillity
- Mitigation proposals such as screening, planting, and sensitive design of structures.

5. Public Rights of Way and General Community Impact

Ubbeston has an active network of public rights of way used by residents and visitors. The ES should assess:

- Temporary closures or diversions of footpaths during construction.
- Impacts on recreational routes, access to the countryside, and community amenity.
- Measures to maintain safe access for walkers, residents, and landowners.

6. Cumulative Impact with Other NSIPs in the Region

The council notes that Suffolk is currently experiencing multiple Nationally Significant Infrastructure Projects (NSIPs). The ES should therefore include:

- A clear cumulative impact assessment considering overlapping effects on traffic, landscape, ecology, noise, and community amenity.
- Identification of combined pressures on rural infrastructure and the environment arising from multiple NSIPs operating within similar timeframes.
- A transparent methodology for assessing cumulative effects across the wider region.

Conclusion

Ubbeston Parish Council would welcome these matters being fully addressed within the Environmental Statement and reflected in the Planning Inspectorate's Scoping Opinion.

We look forward to continued engagement as the project progresses.

Yours faithfully, [redacted] Clerk to Ubbeston Parish Council

UK Health Security Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: WA0210003
Our Ref: 96163CIRIS

Ms Claire Deery
Senior Environmental Advisor
The Planning inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough SL1 4PN

1st October 2026

Dear Ms Deery

Nationally Significant Infrastructure Project
Suffolk Water Recycling Transfer and Storage Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.***

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

We recognise the promoter's proposal to include a health section. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*', setting out aspects to be addressed within the Environmental Statement[1]. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

It is noted that the current proposals do not appear to have any sources of Electric and Magnetic Fields (EMF)

Yours sincerely,

On behalf of UK Health Security Agency

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

[1] https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658

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Your Ref: WA0210003;
Our Ref: 26_36634_P

02/10/2026

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Essex & Suffolk Water (the applicant) for an Order granting Development Consent for the Suffolk Water Recycling Transfer and Storage (the proposed development)

Scoping consultation

Thank you for consulting the Water Management Alliance (WMA) on the information we consider should be provided in the Environmental Statement for this proposed development.

WMA is responding on behalf of three Internal Drainage Boards (IDBs) that could be affected by the proposed development: Broads IDB; Waveney, Lower Yare & Lothingland IDB; and East Suffolk Water Management Board.

WMA is engaging directly with the applicant in relation to potential interactions between the proposed development and the Boards' interests. Our comments on the current EIA Scoping consultation are therefore brief and high-level:

1. WMA welcomes inclusion of a flood risk assessment to support the broader Environmental Impact Assessment. This should include consideration of potential impacts from any aspect of the development, either temporary or permanent, on drainage infrastructure within the IDB districts. Impacts could include physical alteration of watercourses, works close to watercourses that could interfere with the Boards' ability to carry out maintenance, capital or emergency works, and works resulting in the introduction of water to the drainage network.

2. The EIA should reflect the water environment regulatory regime, i.e. noting where consent for works will be required from IDBs, under the Land Drainage Act 1991 and Byelaws pursuant to the Act.

Yours faithfully,

[redacted]

[redacted]

National Infrastructure Officer
Water Management Alliance

Wetherden Parish Council
Suffolk Water Recycling, Transfer and Storage Project – WA0210003
Response to Environmental Impact Assessment Scoping Consultation

Dear Sir/Madam,

Wetherden Parish Council thanks the Planning Inspectorate for the opportunity to comment on the scope of the Environmental Statement for the proposed Suffolk Water Recycling, Transfer and Storage Project.

The Parish Council understands that the project remains at the pre-application stage and that the present consultation concerns the scope and level of detail of the Environmental Statement rather than the principle of the proposed development.

Having considered the information presently available, the Parish Council notes that Wetherden does not appear to lie within the preferred pipeline corridors currently being progressed and that the principal western infrastructure appears to be located in the Eye area.

Nevertheless, because this is a substantial infrastructure project involving extensive pipeline construction, construction compounds, movement of materials and construction traffic across Suffolk, the Parish Council considers that the Environmental Statement should clearly identify and assess any direct or indirect effects upon Wetherden and the surrounding area.

In particular, the Parish Council requests that the Environmental Statement addresses the following matters:

Construction traffic and highway impacts

The Environmental Statement should identify proposed construction traffic routes, HGV routes, construction compounds, workforce movements and delivery routes associated with the project.

It should specifically establish whether construction traffic associated with the project could use roads within or adjoining Wetherden parish or routes through neighbouring settlements.

The assessment should consider the suitability and capacity of rural roads and junctions, highway safety, pedestrian and cyclist safety, road surface deterioration, noise, vibration and disruption to residents.

Where significant construction traffic is proposed, appropriate routing restrictions and mitigation should be identified.

Cumulative traffic and infrastructure impacts

The Environmental Statement should assess the cumulative effects of this project together with other major infrastructure and development projects taking place in Suffolk during the same construction period.

The Parish Council considers that the cumulative effect of construction traffic is particularly important and should not be assessed solely on a project-by-project basis.

Public Rights of Way and recreational routes

Any effects upon public footpaths, bridleways and other Rights of Way should be identified.

Where temporary closures or diversions are required, the Environmental Statement should assess their duration and effect upon users and should establish how safe and convenient access will be maintained.

Landscape and visual effects

The assessment should consider both temporary construction impacts and any permanent above-ground infrastructure.

This should include construction compounds, soil storage, lighting, fencing, access tracks and other infrastructure which could affect the rural character of the landscape.

Noise, vibration, dust and lighting

The Environmental Statement should assess construction noise, vibration, dust and artificial lighting, including effects upon rural communities and individual residential properties.

The assessment should consider the potentially prolonged nature of pipeline construction and associated vehicle movements.

Water environment, drainage and flood risk

The Environmental Statement should identify any effects upon ordinary watercourses, drainage systems, groundwater and surface-water flows arising from pipeline construction or associated works.

It should assess the potential for increased flood risk, sedimentation or pollution during construction and demonstrate how these risks will be controlled.

Ecology and biodiversity

The assessment should include effects upon hedgerows, mature trees, field margins, watercourses and other habitats affected by pipeline construction, compounds and access routes.

The Environmental Statement should explain how habitat loss and fragmentation will be avoided or minimised and how affected land and habitats will subsequently be restored.

Agricultural land and soils

Given the predominantly agricultural character of much of Suffolk through which the project passes, the Environmental Statement should assess loss and disturbance of agricultural land and soils.

It should include measures for appropriate soil handling, storage and reinstatement and consider effects upon agricultural drainage and the continued operation of farms during construction.

Historic environment and archaeology

The Environmental Statement should adequately assess both designated and undesignated heritage assets, including archaeological remains which may be affected by pipeline construction and associated works.

Consideration should also be given to the setting of heritage assets and historic landscape character.

Construction compounds and ancillary development

The Environmental Statement should identify, so far as reasonably possible, the proposed locations and scale of construction compounds, temporary access routes, laydown areas and other ancillary works.

Their environmental effects should be assessed as part of the project rather than deferred to a later stage wherever practicable.

Confirmation of effects upon Wetherden

Finally, the Parish Council requests that the Environmental Statement clearly identifies whether any element of the proposed development, construction activity, construction traffic route or associated works falls within Wetherden parish or is likely to have a significant effect upon the parish.

If the assessment concludes that there are no likely significant effects upon Wetherden, the Environmental Statement should state the basis for that conclusion.

Wetherden Parish Council reserves the right to make further representations as the design develops and more detailed information becomes available through the statutory consultation and Development Consent Order process.

Christine Mason

Parish Clerk to Wetherden Parish Council

YAXLEY PARISH COUNCIL'S SUBMISSION TO SUFFOLK WATER RECYCLING, TRANSFER & STORAGE EIA SCOPING REPORT.

Yaxley Parish Council supports the principle of increasing water capacity in the Hartismere area and the site of the proposed reservoir at WSR9. However, it asks the project team to provide a clear pipeline-routing proposal, minimise disruption to residents, protect the local environment and heritage, plan construction access carefully, and establish long-term community compensation for affected villages.

Introduction:
Yaxley is a small linear village west of the A140, opposite Eye. Homes line the Mellis Road, Yaxley Road, Old Ipswich Road and Old Norwich Road, which is a cul-de-sac. Because these roads are narrow, construction work can disrupt residents' daily lives and access. Recent installation of a water main along Mellis Road/Yaxley Road caused prolonged sectional closures and difficult access. The Parish Council considers that if this route was to have been chosen the proposed pipeline works should have been coordinated with that project to avoid repeated disruption. It should be avoided by choosing a route which avoids the Mellis Road.

Anxiety Caused by Letter to Residents:
Further anxiety arose when some landowners received letters stating that, following feasibility, environmental, engineering and technical assessment and early consultation, preferred corridors and sites had been identified for further design and environmental assessment. The letters explained that the search area for distribution mains had been expanded; that the final alignment had not been determined; that surveys or investigations might be required; and that landowners would be contacted separately before access was sought. They also stated that the project remained under development, that no land-acquisition decisions had been made and that further opportunities for feedback would be provided. However, the letters contained incomplete and unclear wording, and the Parish Clerk's request to the project team for clarification received no response.

The lack of clarity in the letter has caused considerable anxiety among property owners along Mellis Road/Yaxley Road. At the meeting of the Parish Council on 5 August 2026 several residents attended to express their concerns all of which were noted by the Parish Council, as well as the District and County Councillors and local Member of Parliament who were in attendance. Combined with the recent disruption caused by installation of the water main, this has led the Parish Council to conclude that engagement has been poorly handled. The scoping consultation should provide clear information about any pipelines proposed through Yaxley and review the route to identify an alternative that would avoid significant disruption to local residents.

The Project:
Yaxley Parish Council supports the principle of the project because the Hartismere area needs additional water capacity and the site of the proposed reservoir at WSR9 in particular, but objects in the strongest terms to the route of the distribution main west of the reservoir as this area has already suffered sufficient disruption. However, the filtration system must be effective, and the process used to select locations must be explained clearly. The consultation has so far lacked sufficient detail and information.

The project must provide adequate protection for wildlife and replace trees close to the new reservoir. Trees, shrubs and other planting should be established early so that landscaping can screen the reservoir, which has been described as a concrete box. Construction access links and the travel plan must also be carefully designed to minimise disruption to residents. Single-track roads should not be widened and avoided, and alternative routes to the sites must not damage the surrounding area.

The project must provide an efficient and adequate water supply where it is needed, while also delivering benefits to the community in which the reservoir and associated infrastructure are located. A substantial compensation fund should be established for communities affected by the project and overseen by the relevant parish councils. Each affected community should receive payments from the fund for 20 years.

The Local Area Potential Environmental Damage from Construction:
The following extracts from the August 2026 EIA Scoping Report provide relevant baseline information about the landscape, water environment, heritage, noise, businesses, community sensitivity, geology, hydrology and soils within the proposed Distribution Mains through the Parish of Yaxley study area.

Predominantly farmland with cereal crops, temporary grass and clover leys, other neutral grassland, modified grassland, and arable field margins. Woodland, orchards, ponds, scrub, trees, other rivers and streams, ditches and hedgerows are present within the landscape.

The River Dove and its tributaries, together with a network of ordinary watercourses and agricultural drainage ditches, lie within the Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area or within 500 metres of its boundary. These watercourses cross the lowland landscape around Mellis, Yaxley, Thrandeston and Eye. They include wet ditches and floodplain drainage habitats that provide ecological connectivity with the wider River Waveney catchment.

There are seven listed buildings within the village of Yaxley. These include the Church of St Mary, a Grade I listed building (NHLE 1033114), approximately 310 metres south of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area, and Guildhall Cottage, a Grade II* listed building (NHLE 1033115), approximately 130 metres south of it. The remaining Grade II listed buildings are situated on Old Ipswich Road.

These are all at serious risk of damage during construction of the distribution main and this must be avoided.

Local Impact:
Noise of Construction:
14.4.29 The proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area contains residential areas of Mellis, Brome and Yaxley.
14.4.30 For the study area for this section of the EIA Scoping Area, it is expected that the baseline sound climate will be dominated by traffic movements on the A140. For areas farther from the A140, it is expected that road traffic from intermediary roads and intermittent sound from local areas will dominate the baseline sound climate.
Table 18-26 shows that the proposed Distribution Mains through the Parish of Yaxley study area has a mixed sensitivity profile. Noise is the principal concern and is rated high sensitivity because residential properties, healthcare and community facilities, educational facilities, and commercial properties—including Eye Airfield Industrial Estate and Brome Industrial Estate—are nearby. Community and educational facilities, green and open space, recreational facilities, healthcare services, transport connectivity, potential pollution pathways and landscape amenity are rated medium sensitivity. These ratings reflect the presence of vulnerable populations, important local services and key transport routes that could be affected by environmental or traffic changes. Air quality is rated low sensitivity, indicating relative resilience and fewer constraints.

Historical:
11.4.134 A geophysical survey (ESF30514) for a proposed gas and electrical connection was carried out within the southern and southeastern parts of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area, which identified considerable and varied magnetic activity and was followed by a series of archaeological evaluation and mitigation. A late Iron Age to early Roman farmstead (YAX041) was identified during the archaeological evaluation (ESF26032). This evaluation also identified Anglo-Saxon activity, together with medieval and post-medial field systems (YAX041). The A140 follows the route of a former Roman road (BRM011) and is aligned northeast to southwest through the eastern part of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area. Brome Common (TDE016) and Mellis Village Green (MLS011), both former medieval greens, are located within the eastern and southwestern parts of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area. Several artefact scatters dating from the prehistoric to the medieval period are also recorded within this section of the EIA Scoping Area. 11.4.135 The former Eye Railway Branch (EYE135) is located within the southern part of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area, south of Mellis Road. It has since been dismantled. The proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area also encompasses the western extent of the Second World War Eye Airfield.
Plans must be made to avoid damage to these historical sites.

17.4.40 As shown on Table 17-20, there are a total of 18 businesses within 500m of the proposed Distribution Mains through the Parish of Yaxley section of the EIA Scoping Area. The highest proportion of businesses are within the Accommodation and Food Industry (six), with other

businesses being in the construction and retail industries (two), amongst others. Table 17-20: Businesses within 500m of the Proposed Distribution Mains through the Parish of Yaxley Section of the EIA Scoping Area (the terrestrial area).
It is essential that these businesses should not be adversely affected.

Surface Water
The proposed Distribution Mains through the Parish of Yaxley study area overlaps the proposed WSR study area, so the same surface-water receptors apply. No further SMRs have been identified within the Distribution Mains through the Parish of Yaxley study area. However, an additional tributary of the River Dove rises near Mellis, flows east through Yaxley and joins the River Dove near Eye. Under the Water Framework Directive, this watercourse is designated as the Dove tributary–Eye water body. The study area also contains agricultural ditches, drains and ponds, although these have not been quantified at this scoping stage. Both water bodies have a 'moderate' ecological status; further information is provided in Chapter 9, Water Environment.
A significant amount of water runs off from impermeable services on Eye Airfield. It would be beneficial to the area if work was done to harvest this water into the new reservoir.

Landscape:
Landscape amenity has medium sensitivity. The study area is primarily agricultural land near residential receptors in Brome, Mellis and Yaxley. Some sections contain limited vegetation and therefore provide little screening of the proposed distribution mains. Localised changes to landscape character are anticipated, particularly during construction.
There is an opportunity here to improve the local landscape with sympathetic planting. This should be included in the overall final plans.

Population:
18.4.62 Table 18-27 demonstrates that the proposed Distribution Mains through the Parish of Yaxley study area, is characterised by an older population, fewer children, low levels of income deprivation, and low to moderate health and disability challenges, as well as a low population density.
It is essential that the local population is considered when the final plans are drawn up. In particular, older people should not be disturbed by excess noise or traffic movement.

Conclusion:
Essex and Suffolk Water Ltd should take into account the people who live in the area when preparing their plans for the Distribution Mains through the Parish of Yaxley. To this end it is essential that the following are taken into account in the scoping:

- Avoid disruption to the lives of local people by careful planning of construction work and limiting the number of times local roads are dug up. This happened recently during the installation of a water main along Mellis Road/Yaxley Road which caused prolonged sectional closures and difficult access. Other routes should be prioritised to avoid a repetition of this recent disruption.
- The Distribution Main through the Parish of Yaxley appears on the plans to go along the Mellis Road/Yaxley Road. Yaxley Parish Council requires a different route to be used for the distribution main which avoids local roads again being dug up.
- Clarity is needed for the route of the Distribution Mains through the Parish of Yaxley following the letters sent by Essex and Suffolk Water Ltd and the anxiety they caused to local residents. It is essential that the route is clearly shown on plans rather than as currently where there are large patches covering the proposed areas.
- There must be plans to limit the impact of noise during construction and work should be limited to between 08.00 to 18.00, with none at weekends or on bank holidays.
- The use of singletrack roads should be avoided and road hazards such as the parents parking at the beginning and end of the school day at Mellis CEVC Primary School should be taken into account when the construction of the Distribution Mains through the Parish of Yaxley is planned.

Yaxley Parish Council.
Email: [redacted]
Phone: [redacted]