

Date: 29 May 2025
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BY EMAIL

For the attention of the Case Team

southeastanglialink@planninginspectorate.gov.uk

Dear Case Team,

SEA LINK DCO APPLICATION (EN020026)

SCC RELEVANT REPRESENTATIONS

Thank you for the notification that the Planning Inspectorate has accepted the above application and that interested parties have until 23 June 2025 to submit Relevant Representations. Please therefore accept this letter as a response from Suffolk County Council ("the Council") to the Planning Inspectorate's request.

The Council notes the recent changes to the Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015, which mean that Relevant Representations are now required to be "where practicable, the full particulars of the case". Because SCC expects to be invited to submit a Local Impact Report ("LIR") in due course, it should be noted that full technical details of the Council's case will necessarily follow in the LIR.

Notwithstanding the above caveat these Relevant Representations set out, as fully as is practicable, the Council's case in the following paragraphs:

Introduction

1. The Council recognises that, whilst the development of infrastructure to enable the decarbonisation of energy supply is supported in principle, there are still significant shortcomings within the submitted proposals which need to be addressed.
2. The Council considers that solutions to several key issues were not sufficiently explored during the pre-application stage, and it is presently unclear how these issues will be resolved and what further information may be needed to demonstrate the deliverability and acceptability of any solutions, and, as such, NGET's submission of an application for Development Consent for its proposed

Sea Link project has been made prematurely and in a manner that will put undue pressure on the Examination process.

3. A significant number of issues, which could have been addressed through more thorough engagement, will need to be resolved during the six-month Examination, which the Council considers unacceptable because there is no assurance that satisfactory solutions can be achieved within the parameters of the application and this increases risks to the overall deliverability of the proposals.
4. The Council considers that substantive highway matters remain unresolved, in particular regarding the Benhall road over rail bridge, and as such the Council considers that the scheme may not be able to progress effectively through Examination. This is because that although the issue is outside the 'red line' of the scheme, and the Applicant has proposed that it be dealt with by a Traffic Regulation Order (TRO), the entire project is, at the time of submission, predicated upon an access route in which the Council has no confidence, nor any substantive or robust detail, and that may therefore, ultimately, be undeliverable.
5. The Council objects to the Sea Link proposals as currently formulated due to the reasons set out in the following paragraphs, and as detailed in technical comments in Appendix 1. To assist in interpretation of these comments, a map showing the local context of the proposals is provided in Appendix 2.

Significant Issues

Access Route – Benhall Railway Bridge, B1121

6. While the Applicant has considered some options, which could themselves have impacts in transport terms, the Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121, a Council asset which forms part of the access route selected by the Applicant to the converter station site. The Council considers that there has not been a sufficient review of access options.
7. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The Council would have significant concerns over the feasibility of constructing an overbridge to transport abnormal indivisible loads ("AILs") due to the geometry of the railway bridge and its proximity to the A12, where complex traffic management arrangements would be required to allow safe use of the bridge by the public and prevent potentially dangerous queuing of traffic onto the A12. Additionally, Benhall Railway Bridge is not currently included within the Draft Order Limits for the Sea Link proposals.
8. As currently designed, this bridge would form critical infrastructure to deliver the Sea Link scheme. Whilst it is under the control and responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.
9. The Council has actively, and repeatedly, tried to engage with the Applicant on this issue in order to find a satisfactory solution prior to submission of the Development Consent Order ("DCO") application. The Applicant has continually assured the Council that a solution can be found but has yet to provide sufficient detail of a solution that would alleviate the Council's concerns. The Council

considers it unacceptable that the Applicant's application fails to provide sufficient detail of how it intends to overcome the issues with Benhall Railway Bridge, resulting in this matter requiring exploration during the upcoming Examination.

River Fromus Crossing

10. The Council considers that the preferred access route, including the construction of a crossing over the River Fromus, provides a disproportionate solution to creating a permanent access to the converter station site. The proximity and proposed scale of the River Fromus crossing, its approaches and the resultant substantial and permanent loss of existing wooded vegetation would create significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building).
11. The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'
12. The Council is dissatisfied with the Applicant's assessment of alternative access options and its justification for the selection of the River Fromus crossing as the preferred access and considers that the Applicant has not conducted satisfactory engagement on this matter.
13. To make these proposals acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality and harmonise with its setting. However, very little detail is provided by the Applicant in this regard.

Converter station site design

14. The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. The Council acknowledges the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel ("DRP") engagement provided through East Suffolk Council, which the Council attended as an observer.
15. At the final stage of consultation, the Council requested that the DRP's feedback was published by NGET before submission in the interests of transparency and accountability. This would have allowed affected host communities to understand the design approach to the development and how the design principles and masterplan of the site was being developed. It could also contribute to building public confidence in the project and safeguarding community wellbeing. The Council is disappointed that NGET did not take this recommendation forward.
16. Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.

Insufficient land for mitigation within the Order Limits

17. The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant's ability to provide

effective mitigation, including landscape and visual mitigation and diversions of public rights of way.

18. For example, the Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for non-motorised users ("NMUs").
19. The Council, therefore, considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits for reasons of effective landscape and visual mitigation and public amenity.

Impact of Core Working Hours including 7am-5pm on Sundays and Bank Holidays

20. The potential for construction activities to take place seven days a week and on Bank Holidays would provide host communities with no respite from the impacts of the development activities associated with the Sea Link proposals, including disruption to local roads and Public Rights of Way ("PRoW") used for recreational activity at times when they are most frequently used. In turn, this is likely to affect local tourism.
21. The impacts of the proposed core working hours should also be considered cumulatively with other NSIPs. The impacts in terms of geographical proximity or overlap of construction should be considered, in addition to repeated impacts on communities if projects are delivered sequentially, for example the cumulative loss of amenity and health benefits as PRoW are closed, reopened, and closed again, which will discourage users.

Flood risk

22. Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and the current Flood Risk Assessment does not adequately demonstrate this.
23. The Council as Lead Local Flood Authority ("LLFA") is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of ScottishPower Renewables' ("SPR's") East Anglia ONE North ("EA1N") / East Anglia TWO ("EA2") project. Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR's DCO consent due to the lack of assessment methodology or calculation included within the assessment.
24. The Environmental Statement ("ES") fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.
25. The Council LLFA have also produced a Surface Water Management Plan ("SWMP") for the Friston catchment, which will assist the Applicant in assessing existing surface water flood risk in the area.

Cumulative effects

26. Given the number of Nationally Significant Infrastructure Projects (“NSIPs”) and other developments proposed in the area, the need for a full assessment of environmental and socio-economic impacts of the cumulative effects of the project in conjunction with the other projects is particularly important.
27. The construction period for this project is predicted to coincide with those of Sizewell C Nuclear Power Station, NSIPs promoted by SPR, and (if consented) National Grid Ventures’ (“NGV’s”) LionLink project.
28. It is anticipated that this would create significant cumulative pressure on the available workforce in the area and would impact tourism, both in terms of visitor perception and visitor numbers, on the Suffolk Coast. The Council considers it essential that the Applicant engages with local businesses and the host communities to discuss potential impacts and community benefits.
29. The Council disagrees with the Applicant’s assessment that the local labour force is of low sensitivity, as there are existing skills shortages in the region, which will be exacerbated by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods. This could also potentially reduce opportunities to secure any skills and employment legacy from the construction workforces as the projects are likely to be occurring in parallel.
30. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.
31. The Council is also concerned about cumulative impacts on the road network and expects the proposals to contribute to significant effects with regards to traffic on the routes leading to, and in proximity to, the Suffolk Coast (and subsequent impacts on air quality, noise, and vibration), local housing, services, and labour supply. For example, use of the preferred access route to the converter station site via the B1121 could significantly impact communities to the south of Saxmundham, including Benhall and Sternfield, that rely on the town for shops and services.
32. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this.
33. The sequential delivery of NSIPs on the east coast will create sequential impacts at the same locations and could be highly detrimental to, for example, tourism and PRow users, in addition to local residents and businesses. The Council considers these Sequential Project Effects should also be considered, or at least require enhanced mitigation, or deliver legacy projects that offset this impact.
34. The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for that receptor, then they could be significant, as recognised in the Planning Inspectorate’s Advice Note 9. The Council requested

that PRow should be treated as a separate topic in the ES, but this has not been taken forward.

35. The Council is concerned about the cumulative impact of this proposal with the other existing energy projects consented and proposed in this area on the PRow network, where the lack of a single assessment approach for public rights of way, access and amenity has resulted in this effect not being recognised. In particular, the onshore works of the EA1N and EA2 windfarms will impact on the PRow network to the north of Friston where there will be repeated temporary closures of PRow that could overlap with temporary closures on the same PRow required for the Sea Link project.
36. The Council consider it unacceptable for the public to lose their amenity by the effective sterilisation of an area due to closures and disruptions from parallel or concurrent projects. The impact of temporary closures of PRow should not be underestimated, as their value for local amenity could be severely reduced or removed during works.
37. Given that it is likely that the construction periods for Sea Link and LionLink will overlap, at least to some extent, the Council considers it essential that an element of phasing is incorporated to reduce the cumulative impacts. For example, ensuring that the cable ducts between the converter station site at Saxmundham and the substation at Friston for both Sea Link and LionLink are laid at the same time will help to reduce the cumulative impacts on the local community and environment.
38. A map showing the NSIPs facing Suffolk is shown in Appendix 3.

Coordination with other projects

39. The Council considers that project promoters connecting to National Grid onshore, in the same or similar locality, should seek to coordinate, co-locate, and consolidate infrastructure, both their own and other promoters' projects, wherever possible, to minimise the spatial extent of adverse effects on communities and the environment.
40. Throughout the various consultation stages, the Council pressed the case that Sea Link should fully coordinate consenting, construction, and operation with the LionLink project, and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.
41. The Council considers it essential for NGET to engage in discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated heavy goods vehicle ("HGV") movements, workforce numbers and traffic management on the highways network. Commonality could be found in sharing Delivery Management Systems or platforms for permitting highway works.
42. The mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate these effects on community wellbeing.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R Arbon', written in a cursive style.

Roly Arbon

Project Manager (PMO)

Growth, Highways & Infrastructure
Suffolk County Council

Appendix 1 – Detailed Technical Comments

1. Detailed comments of the Council's technical departments are provided in the following paragraphs.

Landscape and Visual

Effects on designated and defined landscapes

2. The proposed landfall site is located between Aldeburgh and Thorpeness, within the highly constrained Suffolk Coast & Heaths Area of Outstanding Natural Beauty ("SCHAONB") and the Suffolk Heritage Coast.
3. It is close to the Sandlings Special Protection Area ("SPA") and North Warren RSPB Reserve, and within the Leiston-Aldeburgh Site of Special Scientific Interest ("SSSI"). The site also has high archaeological potential.
4. In terms of tourism, the site is located within a tourism hotspot, the flat stretch of coastline between Aldeburgh and Thorpeness being a popular route for walks between the two settlements. The site would require access along the B1122 via Aldeburgh.

Potential adverse effects on landscape and visual mitigation measures of other projects

5. It is important to note that the alternating current ("AC") cable corridor route is likely to undermine the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N and EA2.
6. The Council therefore considers it essential for the Applicant to use horizontal directional drilling ("HDD") to minimise adverse impacts on the landscape mitigation package secured under the SPR DCOs.

Good design

7. The Council considers that a clear vision for the landscape for the whole of the project, particularly the converter station site, must be developed. The Council welcomes the work carried out by NGET on the masterplan of the converter station, particularly the Suffolk Design Review Panel engagement provided through East Suffolk Council which Suffolk County Council attended as an observer.

Converter Station site

8. The land to the north and east of Bloomfield's covert is open arable land, from which all historic landscape features are absent. Prior to agricultural improvement works after 1945, this area had a locally characteristic field pattern and included a substantial Ancient Woodland known as Great Wood, as well as ponds and a small plantation typical of the Ancient Estate Claylands landscape type, of which this area is part. The current landscape is generally open, providing wide-reaching views, and a converter station would be prominent from the B1119.
9. There are a number of listed buildings within the vicinity of the converter station site. Wood Farmhouse and Hill Farmhouse, both Grade II listed, would potentially experience a detrimental impact to their setting.
10. Saxmundham Footpaths 5 and 6 cross the site and would require diversion.

11. The Council considers that the development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield.
12. The strip of land along of the B1119 currently included in the proposed DCO limits does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham.
13. Although it is anticipated that work on the design of the converter station would continue post-decision if the Secretary of State granted Development Consent, the Council is concerned about how little detail has been provided at this stage.
14. The Applicant added additional potential work compound areas around the proposed Saxmundham Converter Station site to the DCO limits during the pre-engagement consultation that ended in January 2025. The Council considers that the added flexibility sought by the Applicant results in greater vagueness of the scheme and greater uncertainty.

River Fromus crossing

15. Regarding the proposed scale of the bridge over the River Fromus potentially being up to six metres in height with a span of over 150 metres, including embankment, the Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant adverse impacts on the landscape features and character, views, the setting of adjacent heritage assets, and the water environment.
16. It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in significant adverse effects on the local landscape character and the setting of Hurts Hall (Grade II Listed Building) and St John the Baptist's Church, Saxmundham (Grade II* Listed Building). The setting of the crossing, within land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.'
17. The Council also considers the proposals will also have significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan, and identified as a Suitable Alternative Natural Greenspace ("SANG") in Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020). Significant adverse effects will also be likely on important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).
18. The Council welcomes the change in layout of the Fromus crossing to avoid veteran trees on the eastern bank of the Fromus. However, this will result in the bridge and access road becoming more prominent in key views from the south of the Conservation Area, the Church of St John the Baptist, and Hurts Hall. In order to make this acceptable in landscape and visual terms, the design of both the access road and the bridge would need to be of outstanding quality, and

harmonise with its setting; however, very little is provided by the Applicant in this regard.

Landscape and visual mitigation

19. The proposals are located in highly constrained landscapes and the application of Good Design principles as well as the full Mitigation Hierarchy (including compensation for adverse effects that cannot be mitigated) will be essential.
20. While embedded mitigation will be essential to make the proposed scheme acceptable in landscape terms, the Council considers that apart from reinstatement planting, strategic landscape proposals, on- and off-site, will be required to mitigate landscape and visual impacts and effects.
21. The Council is concerned that, through removing areas from the DCO limits that were previously included for mitigation, comprehensive landscape, and visual mitigation commensurate with the proposals is being made more difficult, if not impossible, to deliver. The Council, therefore, considers that the area along the Fromus, as well as the field north of the converter station site, should form part of the DCO limits, for reasons of effective landscape and visual mitigation and public amenity.

Ecology and Biodiversity

22. The proposed landfall site and cable route is close to the Sandlings SPA and North Warren RSPB Reserve, and within the Leiston-Aldeburgh SSSI.
23. The proposed cable route area is ecologically sensitive, including wetlands, shingle vegetation and lowland heath which support a variety of bird species, such as woodlark, nightjar and nightingale and the proposals are likely to impact local flora and fauna.
24. In terms of Ecology and Biodiversity, the documents have been prepared to a good, professional standard by the Applicant.
25. The Council welcomes the appointment of an Ecological Clerk of Works and considers this a critical role to deliver biodiversity mitigation, compensation, and enhancement, including Biodiversity Net Gain. The Council looks forward to supporting their work through liaison at the Ecology Working Group.
26. The Council is generally content with the Applicant's suite of ecological surveys but notes that there is no mention of Deer. The Council considers it would be useful to understand the population sizes within, and that move through, the area, in order to assist the Applicant in devising strategies to protect new planting.
27. The Council would urge the Applicant to provide Biodiversity Awareness Training for construction workers, delivered by the Ecological Clerk of Works. This would help to ensure that workers are kept informed regarding what they may encounter, and how to deal with these situations appropriately.
28. The Council welcomes the mitigation measures proposed by the Applicant, including temporary hedging and the re-use of trees that have been removed, but considers that appropriate monitoring of their success will be vital.
29. The Council considers that the proposed five-year aftercare period for mitigation planting should be extended to ten years, particularly due to Suffolk's erratic weather patterns, especially in Spring.

30. The Council also considers that the proposed acid grassland restoration and enhancement should be kept in perpetuity, rather than the proposed ten years of management. If this is not feasible, management must continue until such time as the restored areas have met the standard agreed by the Ecology Working Group.
31. The Council is concerned about how this proposal will impact upon biodiversity in combination with every other nationally significant infrastructure project or other relevant proposal in this part of East Suffolk. The Council is concerned that this does not appear to have been addressed in detail.

Cultural Heritage

32. Suffolk County Council Archaeological Service ("SCCAS") have been engaged in discussions with the Applicant throughout the pre-application process and will continue to engage in the DCO process where appropriate, including in the upcoming Examination. Matters relating to Built Heritage are led by East Suffolk Council, however, other elements related to the historic environment, such as those relating to Archaeology matters, are provided below.
33. All archaeological investigation/mitigation for onshore works in Suffolk must be covered by an Overarching Written Scheme of Investigation ("OWSI"). The submitted OWSI is currently in draft form and comments by SCCAS need to be addressed before it can be considered acceptable, although SCCAS are in general agreement with regards to the proposals set out for ongoing archaeological assessment and mitigation within this document. The need for further site-specific written schemes of investigation ("WSIs") following approval of this WSI is set out in this document, which SCCAS are in agreement with. SCCAS wish to highlight that the preferred approach would be that following approval of the Outline Onshore Overarching WSI, a WSI which sets out ongoing outstanding evaluation and mitigation requirements for the entire onshore scheme in Suffolk should be submitted, supplemented by site-specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. The final OWSI and all subsequent WSIs/contractor method statements would need to be approved by SCCAS.
34. Geophysical survey has been completed for the majority of the Order Limits, showing multiple areas of previously unknown features of likely archaeological origin.
35. In communication with NGET's consultants, two phases of pre- submission trial trenching were agreed. The WSIs for both phases have been approved and SCCAS have approved the submitted P1 evaluation report and have monitored the recent P2 works and are therefore aware of the findings, despite the report not yet being available. These phases cover a large proportion of the Order Limits. These investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.
36. SCCAS consider that any remaining areas within the order limits not included in phase 1 or 2 trenched evaluation will require evaluation, including areas of the Friston substation site which have not been evaluated as part of the EA1N/EA2 project. All site accesses, haul roads, compounds and ecological mitigation areas etc. will also need suitable evaluation and mitigation. These works should be undertaken at the earliest opportunity post-consent (if consent is granted) so that

mitigation strategies can be developed for these areas and factored into project programmes. Appropriate provision will need to be made to mitigate any additional areas of archaeological significance which are defined during ongoing evaluation works, including provision for preservation in situ should any remains of national significance be defined.

37. For the area east of landfall which will be subject to directional drilling, SCCAS would advise that appropriate assessment of deposits in this area will need to take place to enable the potential impacts of planned works to be fully understood. SCCAS request that a copy of the Ground Investigation works archaeological monitoring report is provided as soon as possible.
38. The Saxmundham converter station site has now been fully evaluated (with responsibility for this shared between Sea Link and LionLink). Significant archaeological remains requiring mitigation span across this site and the areas which the different parties are responsible for. Mitigation in this area will therefore need to be undertaken in one instance by both Sea Link and LionLink at the same time, or by whoever the first party is that will be undertaking ground disturbance in this area.
39. At the Friston substation site, numerous sites requiring archaeological mitigation have been defined as part of the EA1N/EA2 project. Some of these sites are being preserved in situ during construction works relating to this scheme and are therefore not being subject to mitigation by excavation, however, would subsequently be impacted upon as part of works relating to Sea Link. As such, provision will need to be made by Sea Link to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme and will therefore no longer be able to be preserved in situ. This requirement is not adequately recognised within documents 6.2.2.1 or 6.2.2.3.
40. Given the interaction with the EA1N/2 and LionLink schemes, there is a need to include the results from these projects within assessments, especially for those areas where the schemes overlap or are in close proximity, given the results directly relate to the archaeological potential of this scheme.
41. The Council understands that NGET (Sea Link) and National Grid Ventures (LionLink) are looking into a data sharing agreement. The Council supports this as it would avoid duplication of effort. Co-operation with SPR will also be beneficial, given the overlapping nature of this scheme with the EA1N/2 project.
42. Archaeological remains that are required to be (due to significance) or are agreed to be (due to scheme design possibilities) preserved in situ as part of archaeological mitigation strategies, must be protected from damage during pre-commencement or construction works and throughout site operation. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, operation and in perpetuity must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan ("HEMP"), to be agreed with SCCAS, to secure the appropriate management of these areas within the development going forward.
43. To the west of Grove Road at Friston, the order limits include part of the suspected site of the lost church of Buxlow (recorded on the County Historic Environment Record as KND 009), where geophysical survey as part of the

EA1N/2 project defined anomalies of archaeological interest. Due to the potential national significance of this site, it has been identified as an area requiring preservation in situ as part of this scheme and therefore SCCAS would also expect that no works involving ground disturbance should be undertaken in this part of the DCO order limits as part of the Sea Link project, in line with preservation in situ requirements.

44. As has been shown by other NSIPs in the region, time will be a critical factor in delivering archaeological assessment and mitigation. Archaeological works should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable evaluations to be undertaken and also mitigation to be completed sufficiently in advance of the start of any pre-commencement or construction works, so as to avoid any delays to the development schedule.
45. Numerous large projects taking place in the county at the same time is putting significant pressure on available archaeological work forces, therefore SCCAS advise that NGET should seek to appoint an archaeological contractor for ongoing archaeological and assessment works at the earliest opportunity.
46. Finally, although the OWSI sets out the need for outreach/public benefit as part of mitigation, provision for a detailed Archaeological Outreach Strategy plan/document, to be agreed with SCCAS, should be made. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.

Water Environment

47. National mapping for the converter station site area suggests soils have poor properties for infiltration. Therefore, the Council, as Lead Local Flood Authority ("LLFA"), would encourage the Applicant to explore opportunities for infiltration through compliant testing at the earliest opportunity. If infiltration is not possible, locations to discharge surface water (at greenfield runoff rate) should be identified. These systems should be part of a wider watercourse network.
48. The Council notes that SPR have conducted widespread infiltration testing along the cable route and substation site. The Council considers it essential for the Applicant to acquire this report to gain a greater understanding of the site hydrology and avoid duplication of intrusive testing and other work, in the event that the substation is not delivered under SPR's existing consent.
49. The Council acknowledges that the Applicant has generally identified a return period of 1% AEP (Annual Exceedance Probability) for construction. However, the Council considers that the return period to which the haul road drainage will be designed is unclear, as is the methodology that has been used for the indicative sizing of drainage features on the plans. It is essential that there is sufficient space within the Order Limits to accommodate such drainage provision, particularly the haul road.
50. Where possible, works should avoid areas of existing pluvial flood risk, with suitable mitigation in place where this is not possible. The provision of surface water mapping plans throughout the submission is poor. The legends do not reflect the return periods, climate change epochs and omit reports such as the BMT Surface Water Management Plan ("SWMP") for Friston.
51. Where works intercept overland flow paths, consideration must be given to how these flows will be managed, to ensure there is no increase in flood risk, ensuring

there is adequate space available for any necessary mitigation within the Order Limits.

52. Friston is a particularly sensitive area in terms of surface water flood risk, given the existing flood risk to downstream receptors, and therefore must be adequately assessed. The current Flood Risk Assessment does not sufficiently demonstrate this.
53. The Council is concerned about the flood risk associated with the construction and operation of Friston substation, which remains within the proposals for Sea Link, in the case that the substation is not delivered under its consent as part of SPR's EA1N/2 project. Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation, which was secured under SPR's DCO consent due to the lack of assessment methodology or calculation included within the assessment.
54. The Council is not content with the Applicant's assessment of flood risk in Friston. The ES fails to acknowledge historic surface water flooding downstream in Friston. This should include various s.19 Investigations by the Council as LLFA under the Flood and Water Management Act 2010, and a discussion of the findings of the study conducted by BMT. The Applicant should also sufficiently engage with SPR to understand the context of the area and challenges found to date.
55. The County Council LLFA have also produced a SWMP for the Friston catchment, which is available to the Applicant should they not already have it, to enable them to assess existing surface water flood risk in the area.
56. The Council notes that several ordinary watercourses are missing from the Applicant's plans. There should be an assessment of the watercourses required for construction and permanent drainage systems, in particular the watercourse serving the Saxmundham converter station. This should form a walkover survey for the primary watercourses at Saxmundham and Friston. The discharge watercourses for the construction system should also be identified. On any development where ordinary watercourses are to be used, the LLFA must clearly understand the onward path of the water to an ultimate viable discharge point.
57. The proposed substation is located directly over an ordinary watercourse. A surface water flow path adjacent to this watercourse has been identified as part of the SWMP, which would directly impact the chosen site location. The natural infiltration basin on site has also not been considered, this forms a critical component of the natural surface water regime.
58. Proposed order limits do not extend to the Friston main river up to Highway culvert, as was also the case for the SPR DCO. The County Council LLFA has encountered problems with the SPR projects due to work required outside of the DCO process, including regrading. The Council therefore suggests that an extension of the Order Limits to the culvert at Grove Road may help to prevent similar issues if Sea Link is granted development consent.
59. The methodology, calculation, and areas used for the initial sizing of drainage features, both permanent and temporary are unclear at this time. The LLFA would expect accompanying plans and calculations to demonstrate how realistic the sizing of these features are, given the compact nature of the order limits. This also extends to impermeable areas and losses through permeable surfaces.

60. There is an inconsistency with the proposed Friston substation drainage strategy. The Flood Risk Assessment and plans do not provide clarity on the proposed system. Plans and some text suggest a single infiltration basin with overflow; other text suggests an overflow attenuation basin.

Geology and Hydrogeology

61. The Council as minerals and waste planning authority has responsibility for the safeguarding of planned and operational minerals and waste facilities as well as underlying minerals resources.
62. Waste created during construction, operation and decommissioning should be treated in accordance with the waste hierarchy of, a) prevention; b) preparing for re-use; c) recycling; d) other recovery, and; e) disposal.
63. Reference to the Safeguarding plans attached to the Suffolk Minerals & Waste Local Plan indicate that there would be no conflicts with existing minerals and waste facilities.
64. In terms of the underlying sand and gravel resources, some of the proposed development would not sterilise resources, but extraction within parts of the area occupied by the underground cables would not be possible. However, the national importance of the proposals outweighs the sterilisation of the affected regionally important minerals.
65. Where minerals are excavated on site during the course of construction then they should be used in the construction of the proposed development or provided to the market for sand and gravel where possible.
66. Removal of the development following cessation of use will be required to restore access to mineral resources.

Agriculture and Soils

67. Areas of best and most versatile ("BMV") agricultural land would become unavailable in areas occupied by surface infrastructure and would require remediation to the same standard following decommissioning.
68. Areas of BMV agricultural land would be unavailable during construction and decommissioning in areas of underground cabling and would require remediation to the same standard following construction and decommissioning.
69. The proposal would cause disruption to field drains, in particular areas of cable undergrounding, and mitigation would be required to restore drainage following construction and decommissioning.
70. Whilst the provisional agricultural land classification of the converter station site is slightly higher than on alternative sites, the loss of landscape features would be limited, and the potential for Green Infrastructure benefits and Biodiversity Net Gain would be considerable with the right design parameters.

Traffic and Transport

71. The proposed peak construction date (2027) for this project is close to Sizewell C Peak Construction (2028). There is a strong likelihood that Scottish Power Renewables' EA1N and East Anglia THREE ("EA3") will still be within their construction phase and LionLink may also commence within this period. There is a lack of cumulative assessment regarding the impacts of traffic from these projects, with the Applicant presuming that previous projects have mitigated their harm. The Council does not concur with this.

72. The total peak number of heavy goods vehicles (“HGVs”) associated with this project is 346 two-way movements (173 deliveries). This exceeds Scottish Power (270 two-way movements) but is below Sizewell C’s 500 two-way movements (early years) and 600 two-way movements (peak year). Preceding projects have undertaken cumulative impact assessment of the whole of the A12 between Ipswich and Lowestoft.
73. In view of the HGV volumes above, the Council considers that the A12 should be included within the Traffic and Transport Study Area, noting that the A12 north of Seven Hills is maintained by the Council. At Preliminary Environmental Information Report stage, the Council reserved its position on the extent of the transport assessment scope awaiting sufficient data to make a judgement.
74. The Council’s primary concern is safety particularly at evolved junctions where delays joining the main carriageway may result in driver frustration and risk taking.
75. The reliance of energy projects including SeaLink to use shift patterns to avoid worker trips during network peaks may, in combination with other projects, result in new peaks at the time workers arrive and depart. Insufficient evidence is provided to demonstrate that the combined impacts of the energy projects will not create a new network peak due to superimposition of shift changes.
76. As Local Highway Authority (“LHA”), the Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on roads used for recreational purposes and the uninterrupted impacts on local communities. The application appears conflicted stating that HGV deliveries will not be permitted on Sundays and Bank Holidays but then placing a limit of 30 HGV movements for a list of allowable construction activities.
77. Pre-construction activities as defined within the Order fall outside the remit of the Construction Traffic Management and Travel Plan (“CTM&TP”) and are therefore not managed. This has been a problem with other NSIPs in the deliver phase.
78. The CTM&TP in the Council’s view lacks rigorous controls on HGV routing and a cap on numbers in line with what is assumed in the assessments and has been accepted in previous DCO consents. Nor is there a commitment that can be enforced in terms of workers shift patterns that form part of the embedded mitigation. It is unclear if the definition of ‘workers’ includes visitors or others not involved in construction. The Council will require further assurance regarding the embedding of controls within management documents and the subsequent monitoring and enforcement of these.
79. Where assumptions are made with assessments, they should be evidenced. This includes the estimation of HGV, worker numbers and profiles, and assumptions made for the sensitivity of receptors. The Council is concerned that the threshold for the sensitivity in a number of topics is set at a high bar and hence mitigation not considered necessary.
80. The Council is concerned that some of the routes proposed for construction traffic are not appropriate for significant volumes of construction traffic and that the transport impacts have been underestimated. Specific locations are:
 - The preferred access route to the converter station site via the B1121 on communities to the south of Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield.

- The centre of Saxmundham that is constrained by a historic crossroad layout.
 - B1121 through Sternfield to Friston which has pinch points and bends.
 - The landfall site which is constrained with regards to access as the surrounding roads are unsuitable for HGVs and AILs including the geometry of the A1094/B1122 roundabout in Aldeburgh which was discussed in detail in the examination of EA1N/2.
 - The A1094 due to the superimposing of SPR EA1N, EA2 and Sizewell C (non-HGV) traffic.
81. Routes such as the A12 and A1094 are subject to seasonal fluctuations due to events, tourism and agricultural activities which has not been acknowledged in the assessment.
 82. The application includes proposals for traffic regulation orders, including prohibiting vehicles on roads including B class ones. It is unclear over what duration this will be required and hence what the impacts on the road users, communities and other NSIPs will be. The Council would require robust justification before it can accept such restrictions.
 83. The Council has a concern that the additional traffic and works on the network may compromise emergency access to Sizewell B due to the proposed restrictions on vehicles but also the cumulative impacts of traffic and roadworks from all NSIPs.
 84. ALL special order routes from the Strategic Road Network or port to the site must be surveyed to prove there is a viable route to the converter station and substation. Reliance on the ESDAL notification system may result in loads being refused, for example if a highway structure has an STGO or Special Order weight restriction.
 85. The Council is concerned that whilst a number of constraints have been identified for these moves, the Applicant has chosen to investigate to determine if mitigation is required and if this can be delivered without inclusion in the order limits.
 86. The Council has significant concerns regarding the use of Benhall Railway Bridge on the B1121 as part of the route proposed by the Applicant for access to the converter station site. The structural condition of the bridge means that it has been restricted to STGO 1 (46 tonnes). The geometry of the B1121, the bridge and its proximity to the A12 could cause significant traffic management issues that the Applicant needs to consider albeit within the application they do not consider it necessary to include any additional areas beyond the highway boundary within the Draft Order Limits. Although an overbridge could, in principle, be constructed, the impacts of this in terms of disruption to the highway network, users and local residents, including those affected by any diversion, have not been considered. With the current restrictions this route would not be resilient for long term access to the Saxmundham converter station site and the Council considers there are serious concerns regarding deliverability.
 87. As currently designed, this bridge would form critical infrastructure to deliver Sea Link, and potentially LionLink. Whilst it is under the control and the responsibility of the Council, it does interact with Network Rail assets which are themselves critical for the delivery of Sizewell C (of which the UK Government is a major

shareholder). Therefore, effective joint engagement between all relevant parties regarding this bridge will be essential.

88. The Council considers that action is required to provide more detailed information regarding vehicular movements during construction of Friston substation, particularly AILs, to understand the movements associated with each of the SPR and NGET projects.
89. The Council encourages NGET to continue discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, NGV, and SPR, to minimise highways impacts on the host communities with regards to requirements for materials and associated HGV movements, workforce numbers and traffic management on the highways network. Commonality could be found in sharing Delivery Management Systems or platforms for permitting highway works.
90. At present the Applicant has not considered Protective Provisions or a separate Highways Agreement to secure the authority's position as LHA.
91. The Council is disappointed that, as the LHA and a statutory consultee, it was not provided with sufficient time to contribute to the Statement of Common Ground before it was submitted to the Planning Inspectorate.

Public Rights of Way

92. The Council is disappointed that the impacts on both the physical resource and the amenity value of the public rights of way and access network are not treated as a separate topic in the ES, as requested during consultation, but, instead, split up over a number of disciplines. This has made it difficult for the impacts on PRow to be clearly interpreted by the public.
93. The division of the effects of the development on PRow across several chapters, each with their own set of criteria regarding harm, diminishes the level of cumulative effects and the level of importance of the local access network and the quality of the user experience and amenity value. As a result, an impact in isolation might be assessed as not being significant, whereas if impacts had been considered collectively for a PRow user, could then be significant, as recognised in the Planning Inspectorate's Advice Note 9.
94. The Council would like to see a commitment to keeping PRow open and available during the construction period through the use of management measures, such as controlled crossings, traffic marshals and signage. If temporary closures are required, then the number and duration should be kept to a minimum, and effective mitigation is needed for the impacts on recreational users of the PRow network, especially during the construction period.
95. The Council is concerned that reductions applied to the proposed order limits over the pre-application stage have limited the Applicant's ability to provide effective mitigation for diversions of public rights of way.
96. For example, at the targeted consultation stage, a considerable amount of land was removed from the draft order limits, where it was previously proposed to create open access land for use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.

97. The Council is concerned that there is insufficient space within the Order Limits, along the southern side of the B1119 Saxmundham, to allow for a landscape buffer next to the watercourse and the creation of a bridleway to provide an off-road route along the B1119 for NMUs.
98. Any alternative provided PRow must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for NMUs to access local facilities and employment.
99. The Council is also concerned about the impact of the extended working hours (including Sundays and Bank Holidays) on the PRow network at times they are most frequently used.
100. There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on Public Rights of Way. These include providing a Bridleway link alongside the B1119 for non-motorised users, upgrading the permanent diversion of E-354/006/0 and E-460/023/0 to bridleway and creating a footpath link (PRow) alongside the Fromus crossing to link to the existing PRow network.
101. The Council considers that the surfacing of E-103/006/0 from Sluice cottage at the beach to the old railway line should be considered for mitigation due to the disturbance and impact on amenity as set out in the following documents: Schedule 9(1)(b) '...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'. And Consideration of landscape and visual effects at both converter station sites, and possible mitigation including siting, planting & design approaches. From table 2 of the PINS Pre-Application Planning Services - Programme Document dated 2025 and 2.7 of the Project overview document dated October 2023 which states 'When undertaking works, we consider what practicable measures can be taken to enhance nearby and surrounding areas for the benefit of local communities and the natural and historic environment'.
102. The Council welcomes the inclusion of the King Charles Coast Path in document 7.5.9.11 Outline Rights of Way Management Plan – Suffolk in sections 4.2, table 4.2 and table 5.1, however there are two other promoted routes which should be considered and impacts assessed, the Suffolk Coast Path not yet fully superseded by the Kings Charles Coast Path), and the Sandlings Walk, as these are tourist routes, as well as local amenity and routes for health and wellbeing.

Socio-Economics, Recreation and Tourism

103. The Council has been disappointed with the quality of engagement on the proposals, both with technical departments and with the community, particularly around socio-economic and tourism issues.
104. The Council welcomes the opportunity to strengthen and support the growth of local businesses through their involvement in a project such as this. However, to achieve any growth the Applicant must be willing to engage collaboratively, as early as possible, with the economic development agencies within Suffolk. This is especially pertinent when it is known that this project is one of a series of projects being brought forward by National Grid in the locality and therefore will provide a far greater opportunity than a single project would.

105. The project could benefit the local economy as a result of additional spend from a non-homebased workforce. The Council considers it essential for the Applicant to work collaboratively with the Council to develop strategies to encourage workers to spend locally.
106. The Applicant should identify businesses, particularly those associated with recreation and tourism, in close proximity to the red line boundary of the scheme, to assess potential impacts to these organisations of the construction works and access routes.
107. There are a significant number of NSIPs in East Suffolk that will be requiring similar skilled workers at the same time, and the construction period for Sea Link is predicted to coincide with that of Sizewell C Nuclear Power Station. This is likely to put pressure on the available workforce, potentially reducing opportunities to secure any skills and employment legacy from the construction workforces as the projects could be occurring in parallel. This is also likely to lead to high levels of workforce displacement and churn, impacting local businesses and the local supply chain. The Council expects the Applicant to work with the Council to develop strategies to control the rate of workforce displacement, and to quantify and mitigate the negative impacts of this displacement.
108. The identification of the 60-minute study area is not in line with the expectations of the Council. As set out in Suffolk County Council's Energy and Climate Adaptive Infrastructure Policy, the Applicant is expected to define a separate economic study area for the workforce which defines a geography from which unskilled/semi-skilled labour can be expected to be drawn from for each distinct work phase and a defined geography from which skilled labour could be expected to be drawn from for each distinct work phase. This is to be identified by assessing the different skills required within each phase and the duration of the phase. The Applicant is expected to consider the propensity for travel, the availability of transport and the preferred method of travel to work for each.
109. The Council expects a scenario-based assessment of workforce availability, ensuring worst-case scenarios are used when assessing displacement risks, housing pressures, and cumulative effects. The assessment must also provide a clear breakdown of workforce phases, anticipated labour sources, and structured supply chain opportunities at hyper-local, local, and regional levels. Methodology should be pre-agreed with the Council to ensure robustness and alignment with wider socio-economic modelling.
110. The Applicant expects a low level of net additional construction employment to be taken by local residents, due to the jobs being specialised construction. This is based on professional judgements and other similar schemes, but it is not clear that the number of other infrastructure projects taking place in the area, as well as those proposed by the Applicant, and therefore the prevalence of such specialised skills locally has been taken into account.
111. A comprehensive Skills and Employment Plan and engagement with the Regional Skills Coordination Function at the Council would support a strategic approach to this issue.
112. The local labour force has been assessed to be of low sensitivity due to its adequate capacity to experience impacts without incurring a change on the economic well-being of residents and local businesses. The Council disagrees with this due to existing skills shortages in the region, which will be exacerbated

by the cumulative impacts of other infrastructure projects in the local area with overlapping construction periods.

113. The Council disagrees with the scoping out of Operational Employment due to limited numbers, as this issue should have been considered alongside other projects in the region, which will amplify any effects caused.
114. Commitment to a comprehensive Skills and Employment Plan and engagement throughout the planning process, as well during construction, with the Regional Skills Coordination Function at the Council would support an ongoing assessment of cumulative effects and a strategic approach to skills and employment.
115. Suffolk offers a rich and varied tourist offer and is known for its heritage assets and landscape designations, such as the SCHAONB and Heritage Coast.
116. The Council anticipate that the project, given its location close to the SCHAONB and other rural areas of Suffolk of importance to the tourism economy, could have impacts upon visitor perception, and visitor numbers, both during construction and during operation, which, in particular in combination with other projects happening simultaneously in the area, could be significant.
117. The Sea Link proposals need to fully assess its direct and indirect impacts on all known features and designations, in particular the extent to which its physical infrastructure will impact and detract from the environmental quality of an area for recreational activity, alongside quantifying the impact of construction on tourism assets and visitor numbers.
118. The Council is seeking to ensure the accommodation of construction workers and other workers who are not home based is to the benefit of the visitor economy rather than disrupting it. For example, depending on the scheduling of works, utilising accommodation that is available out of season that could complement the tourist season. If this were not to be achieved, the accommodation sector would be unlikely to be able to accommodate both workers and tourists, thus resulting in a reduction in tourist numbers and potentially detrimental impacts on tourist businesses in the region.
119. The additional core working hours (7am – 5pm on Sunday and Bank Holidays) is likely to affect local tourism due to the impacts on the PRoW network and roads used for recreational purposes at times when they are most frequently used.
120. The Council encourages the Applicant to consider community benefit options and would be happy to discuss how community benefits suitable for the locality could be incorporated. Secondary mitigation should be in addition to any community benefits from the development, guided by the government's expectations set out in the Community Funds for Transmission Infrastructure Guidance published by the Department for Energy Security & Net Zero in March 2025.
121. The Council also encourages project promoters to consider legacy opportunities of all elements of their development.

Health and Wellbeing

122. The proposals involve the construction of substantial electrical infrastructure with associated Electrical and Magnetic forces. The parameters to which the proposals are designed are precautionary in approach based upon research and the Council has been reassured that all recognised standards in respect of Electric and Magnetic Forces will be adhered to.

123. Suffolk County Council has published a supplementary guidance document for NSIP developers on the topic of Community Engagement and Wellbeing, to support its Energy and Climate Adaptive Infrastructure Policy.
124. This guidance highlights the importance of effective engagement with communities. The Council considers it essential for promoters to seek to develop relationships of trust, confidence and understanding with the community, taking a collaborative approach to involving the community in the design and delivery of the project. Clear, comprehensive, honest, and open engagement with the community throughout the pre-application, consenting, construction and decommissioning phases will help to safeguard community wellbeing, as participants are more likely to feel that they are being listened to and their opinions and ideas are being taken into account.
125. The Council considers that effective engagement with the local community during the pre-application stage has not been achieved. The targeted consultation overlapped the start of the summer holidays and the Ofgem consultation for Nautilus and only lasted 5 weeks. The timing of these consultations will therefore have limited the community's ability to effectively engage with and respond to the consultations.
126. The Council expects mental health, and wellbeing impacts to be assessed as part of the ES. The Council is pleased to see that the impacts of the project on mental health have been acknowledged in the ES, although it is concerned that a greater emphasis appears to have been placed on the physical health effects.
127. As discussed in the Inter-Project Cumulative Effects section below, it is important for the cumulative impacts to be considered. This area of Suffolk is facing a huge number of NSIPs, and the mental health and wellbeing impacts are cumulatively increasing with each new project. The Council therefore considers it essential for project promoters to work collaboratively to minimise and mitigate these effects on community wellbeing.
128. The potential for construction activities taking place within the additional core working hours stated could result in communities in the locality having no respite from construction traffic and could contribute to substantial impacts on the mental health and wellbeing of those communities. The Applicant must consider the community wellbeing impacts of the proposed working hours.
129. There are a number of simple measures that the Council considers it appropriate for the Applicant to implement to mitigate against the adverse impacts of the proposals on community wellbeing. These include providing a 'relationship manager' role as a consistent, impartial, single point of contact for the community, providing timely, high-quality, and accessible information on proposals, and engaging in face-to-face conversations with community leaders, parish councils, and the local community to guide them through what is a highly technical and complex process.
130. The Council considers investment in local community assets, such as public spaces or village halls, as an effective approach to mitigation and compensation for the local community, whilst also helping to foster positive relationships with affected communities. Relevant assets should be identified in collaboration with the community itself.
131. Helping the local community to better support its own mental health and wellbeing is also an effective mitigation measure. This could be achieved through

provision of funding to local mental health organisations, funding Mental Health First Aid training for members of the community, and raising awareness of tools for maintaining wellbeing, such as East Suffolk Council's WellMinds resource.

Air Quality

132. Air Quality matters are the responsibility of the relevant district council. The Council will, therefore, generally defer to East Suffolk Council on these matters, aside from some comments provided below.
133. The Council is pleased that its recommendation to install pollution sensors to accurately monitor levels of pollutants has been taken forward by the Applicant.

Noise and Vibration

134. Noise and Vibration matters are the responsibility of the relevant district council. The Council will, therefore, generally defer to East Suffolk Council on these matters.
135. The Council is concerned about the impact of the extended working hours (including Sundays and Bank Holidays) resulting in no respite for local residents and visitors with respect to noise and vibration impacts.

Suffolk Fire and Rescue Service ("SFRS")

136. SFRS considers it essential that any changes to footprint, use, occupancy, or access take into account the full weight of a blue light emergency response to an incident in any one of the locations.
137. SFRS need to ensure that Emergency Rendezvous Points ("RVPs"), access, and water supplies are appropriate for each work location and consider the final operational use and arrangements. Increased pressure is being placed on SFRS to consider the effects of its actions and tactics, and Sea Link and other NSIPs must assist the Fire Service to take appropriate and effective action in the event of an incident, without having to mitigate control measures that were omitted and should have been built into the infrastructure at build stage.

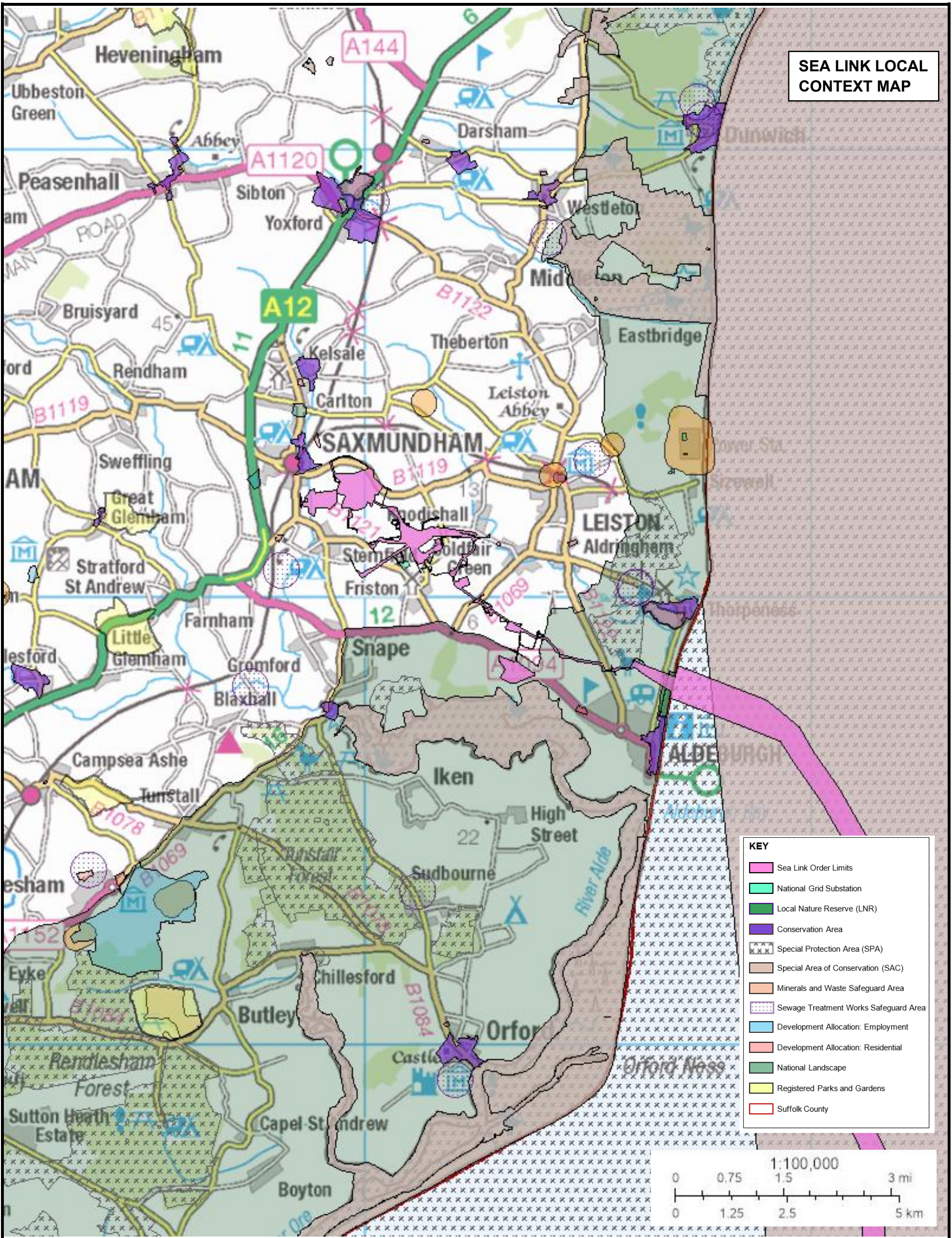
Emergency Planning



138. Due to the Sea Link proposals being within 10 km of the Extended Emergency Planning Zone for Sizewell B power station, an emergency plan for the construction of Sea Link would be required prior to commencement. This would cover arrangements for protecting construction staff during any site or radiation emergency, and would show that the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.

Draft Development Consent Order ("dDCO")

139. In October 2024, the Council commented on an early draft of the dDCO and provided comments on NGET's response in January 2025. While NGET has made several of the changes suggested, the Council remains concerned about numerous matters, which are set out in the following paragraphs.
140. The definition of "discharging authority" in Requirement 1 of Schedule 3 does not clearly identify the body (or bodies) that should fall within the definition of "discharging authority", and a similar drafting has already caused confusion post-consent for County Council officers dealing with Bramford to Twinstead.

141. The deadlines in articles 11(3), 14(5), 15(9), 17(2), 22(8), 50(9), and 51(5) should be 56 days, rather than 35 days.
142. The deadline in paragraph 1(1) of Schedule 4 (discharge of requirements) should be 56 days, rather than 35 days.
143. Requirement 4 of Schedule 3 requires the Applicant to provide the relevant planning authority with written notice of the completion of construction for each stage of the authorised development, and the operational use of that part of the authorised development, within 28 days. The Council considers this should be shortened to 14 days, as in the Bramford to Twinstead DCO.
144. Requirement 6 does not require outline versions of the Material and Waste Management Plan, Construction Drainage Management Plan, and Flood Management Plan, but no justification is provided.
145. There is a lack of information provided in Requirement 13 in relation to decommissioning of the substation.
146. The proposed fees in paragraph 3(1) of Schedule 4 (Discharge of requirements) are insufficient, and the Council would prefer a Planning Performance Agreement ("PPA") to be entered into with the Applicant to cover the discharge of requirements.
147. The Council would appreciate justification for the claim in article 52(3) that the duty in section 206(1) of the 1990 Act (replacement of trees) does not apply.
148. The Council is concerned about the exclusion of soft landscaping as an item within each of Work Nos. 1 to 5 of Schedule 1 (Authorised Development)
149. DCO Requirement 14 must secure ongoing archaeological assessment and mitigation for all areas of the scheme, prior to the commencement of any pre-commencement or construction works involving ground disturbance, with a specific sign off point tied to the construction project, as well as making appropriate provision for post-excavation assessment, reporting, publication, and archiving, within a suitable timeframe. The current wording does not successfully achieve this and there is also insufficient detail in the Outline Written Scheme of Investigation to secure this; therefore, SCCAS advise the need for amendments in order to reach agreement with the wording of this requirement. The suggested wording will assist in the timely delivery of the project and prevent potential delays to the sign off of archaeological requirements.
150. SCCAS would advise the need for the addition of a clause to Part 4: Supplemental Powers in relation to appropriately dealing with archaeological human remains believed to be over 100 years old in line with the Burial Act 1857 and the terms of any issued burial license, as well as the requirements of the relevant WSIs and best practice documents.



	<p>Growth, Highways & Infrastructure Endeavour House 8 Russell Road Ipswich Suffolk IP1 2BX</p>	<p>SEA LINK RELEVANT REPRESENTATIONS APPENDIX 2</p> <p>Map showing the local context of the proposals</p> 
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