

## Cabinet

<b>Report Title:</b>	Council response to the Statutory Consultation in respect of the LionLink Multi-Purpose Interconnector										
<b>Meeting Date:</b>	24 February 2026										
<b>Lead Councillor(s):</b>	Councillor Richard Rout, Cabinet Member for Devolution, Local Government Reorganisation and NSIPs										
<b>Local Councillor(s):</b>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">Councillor Michael Ladd</td> <td style="width: 50%;">Kessingland and Southwold</td> </tr> <tr> <td>Councillor Annette Dunning</td> <td>Halesworth</td> </tr> <tr> <td>Councillor Richard Smith MVO</td> <td>Blything</td> </tr> <tr> <td>Councillor TJ Haworth-Culf</td> <td>Aldeburgh and Leiston</td> </tr> <tr> <td>Councillor Andrew Reid</td> <td>Wilford</td> </tr> </table>	Councillor Michael Ladd	Kessingland and Southwold	Councillor Annette Dunning	Halesworth	Councillor Richard Smith MVO	Blything	Councillor TJ Haworth-Culf	Aldeburgh and Leiston	Councillor Andrew Reid	Wilford
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### Brief summary of the item to be considered

1. This report covers the County's Statutory Consultation Response to the National Grid Ventures (NGV) LionLink Offshore Hybrid Asset (OHA) proposals. This would create an interconnector between the United Kingdom and the Netherlands. It would also connect to and transmit electricity from a Dutch offshore windfarm (Nederweik 3).

### What is Cabinet being asked to decide?

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| <ol style="list-style-type: none"> <li>2. The Cabinet is recommended to:           <ol style="list-style-type: none"> <li>a) approve the submission of the Consultation Response to National Grid Ventures (NGV) and object to the LionLink scheme based on the considerations and concerns set out in this Report, including the choice of Walberswick for a landing site, which the Council considers wholly inappropriate, and the long HVDC cable route to Saxmundham;</li> <li>b) approve the submission of the Consultation Response to National Grid Ventures (NGV) based on the considerations and concerns set out in this Report;</li> <li>c) authorise the Executive Director for Growth, Highways and Infrastructure, in consultation with the Cabinet Member for Devolution, Local Government Reorganisation and NSIPs, to make minor amendments to the draft Consultation Response set out below;</li> </ol> </li> </ol> |
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- d) authorise the Executive Director for Growth, Highways and Infrastructure, in consultation with the Cabinet Member for Devolution, Local Government Reorganisation and NSIPs, to continue working with NGV with the aim of securing improvements on matters highlighted of being of concern; and
- e) continue to raise the Council's concerns with Government regarding the cumulative impacts resulting from the development of this and other energy projects in Suffolk.

### **Reason for recommendation**

3. The Council is a statutory consultee for Nationally Significant Infrastructure Projects (NSIPs).
4. Officers have scrutinised the proposals submitted by NGV and have discussed with local Councillors, colleagues from East Suffolk Council, Parish Councils and the Suffolk and Essex Coast and Heaths National Landscape Project.
5. There are aspects of the proposal which are yet to be satisfactorily addressed, as outlined in the later sections of this report, including noise impacts upon Walberswick from Horizontal Directional Drilling.
6. It is important for the Council to clearly set out its concerns to NGV in order that they may make amendments to their proposals accordingly.
7. It is important for the Government to be aware of the implications for the local area of multiple NSIP projects.

### **What are the key issues to consider?**

8. Is Cabinet content that the draft Consultation Response set out below appropriately sets out the overall balance between the specific issues of the proposals and the wider national benefits of the development?
9. Are the key issues identified in this report the correct ones; should others be added?
10. Is Cabinet content with the proposed delegated authorities?

### **How does this relate to the Suffolk County Council objectives?**

11. This report is linked to the Council's objectives indicated below:

Promoting and supporting the health and wellbeing of all people in Suffolk	<input checked="" type="checkbox"/>
Strengthening our local economy	<input checked="" type="checkbox"/>
Protecting and enhancing our environment (including carbon reduction)	<input checked="" type="checkbox"/>
Providing value for money for the Suffolk taxpayer	<input checked="" type="checkbox"/>

## **How will this impact on the Council's objectives?**

12. A project of this scale will have significant impacts on Suffolk's communities, which can have impacts on the wellbeing of residents in the affected communities.
13. There is the potential to strengthen the local economy through the construction, operation and decommissioning that will require local resources in terms of both materials and manpower. The County will seek agreement with NGV to train the locally based workforce.
14. Failure to provide an enhanced energy supply network could result in potential sources of generation not being fully utilised.
15. A Planning Performance Agreement will cover officer time in responding to these proposals.

## **What are the resource and risk implications?**

16. The project is one of a significant number of Nationally Significant Infrastructure Projects (NSIPs) that are proposed, or have been approved, in Suffolk. Through the work on other NSIPs, the Council has built up a considerable level of expertise, and is recognised as a Centre of Excellence in dealing with NSIPs. A number of other NSIPs affect a similar part of Suffolk, which is further discussed in the proposed development section of this report.
17. A Planning Performance Agreement (PPA) to cover the cost of the Council's involvement thus far and up to the end of the Examination has been agreed in principle with NGV, hence the Council's engagement in the process is cost-neutral to the Council (subject to the proviso that if the Council was found to have acted unreasonably in its conduct at the future Examination it could be subject to an award of costs against it – which is mitigated by ongoing collaboration and engagement of legal advice) and is providing value for money for the Suffolk taxpayer. A further PPA will be required to cover the Discharge of Requirements if the Secretary of State grants a Development Consent Order. The Council will also seek fees for highway agreements and permits together with officer time to monitor management plans.
18. When making its decisions, Cabinet needs to be mindful that a balanced and evidenced based approach to the proposals is required. The response needs to be robust and ambitious enough to ensure achieving adequate mitigation and compensation for impacts imposed on Suffolk's environment, communities, and businesses, as a result of the development. However, to be credible and achieve effective outcomes, the demands on NGV need to be justified by evidence, proportionate to the impacts, deliverable and realistic.
19. An Equalities Impact Assessment (EqIA) screening was undertaken and there were no identified impacts on people with protected characteristics.
20. It is recognised that communities impacted by and benefitting from the project and the response of the County Council to the promoter, will include people with protected characteristics and the proposed response therefore seeks to benefit all members of society.
21. In addition to the above, the Examining Authority and Secretary of State have the responsibility for discharging their equalities duties through their final decision.

22. The Cabinet is directed to consider this information provided in relation to the EqIA before making its decision. The Equality Impact Assessment (EIA) Screening can be found at <https://pandp.suffolk.gov.uk/> and by searching for 'Nationally Significant Infrastructure Projects (NSIPs)'.

### **What are the timescales associated with this decision?**

23. The consultation response to the Statutory Consultation must be submitted to NGV by 10 March 2026.
24. The currently anticipated timescale for the remaining DCO process (over which the County Council has no control) is as follows:
  - a) Submission of Application by NGV 2026;
  - b) Examination in Public held by the Planning Inspectorate 2027;
  - c) Decision by Secretary of State 2028;
  - d) Construction by NGV's contractors commences 2028, and;
  - e) Fully operational 2033.

### **Alternative options**

13. The Cabinet could decide to modify the Response to the Statutory Consultation.

### **Who will be affected by this decision?**

14. Residents, businesses, visitors and the environment will be affected by the Secretary of State's decision regarding these proposals.

### **Main body of report**

#### **Overview**

15. It is NGV's position that this project has become necessary as a result of the changes to where and how electricity will be generated as part of the Government's de-carbonisation and net-zero ambitions, with its aim to decarbonize the grid by 2030 and achieve Net Zero by 2050, as set out in the Government's Clean Power 2030 Policy and the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
16. The basic premise being that the pattern of generation is switching towards offshore wind, nuclear, solar, and a more interconnected grid with countries in Europe.

#### **The Council's Engagement with Government**

17. Suffolk County Council continues to engage with the UK Government, regarding the cumulative impacts of electricity generation and transmission Infrastructure, on the environment and communities of Suffolk.
18. The Council's current engagement with Government Ministers and officials is focussed on securing tangible early and substantive co-ordination of energy projects, and an equitable settlement for Suffolk's communities and environment, for hosting a significant proportion of the infrastructure that the UK needs.

19. In addition, the Council responds, often jointly with other councils, to multiple consultations regarding the future governance and management of electricity networks, and the processes and policies for energy project planning and consenting.
20. The Council is represented on the Offshore Electricity Grid Task Force (OffSET). This is a group of MPs from across the region, under the chairmanship of Sir Bernard Jenkin, that includes County Councillors from Suffolk, Essex, and Norfolk.

### **Proposed development**

21. LionLink would provide a 2GW interconnector with the Netherlands in addition to existing interconnectors that are already operating between the UK and Belgium, Denmark, France, Ireland, Netherlands and Norway. It would be the first to also offer a direct connection with an offshore wind farm, namely Nederweik 3 in Dutch Waters which has a capacity of 2GW. NGV's Dutch joint venture partner is Tennet. This Statutory Consultation however focuses on the UK components of the scheme.
22. The HVDC submarine type cable between the UK and the Netherlands would be buried on the seabed and would navigate around constraints such as other cables, designated nature conservation sites before being drilled underneath the coast to reach an onshore transition bay where onshore type cables take over just south of Walberswick. Drilling under the coast would involve the use of three Horizontal Directional Drilling (HDD) machines working for several weeks and including continuous drilling for periods of several days. The Transition Joint Bay would be 50m x 5m.
23. The onshore HVDC cable would then be laid at a depth of 1.5m deep in a trench 2.45m wide along a route 19.9km long until it reaches the proposed Converter Station site at Saxmundham. Sections of this route would involve using HDD machines in order to avoid constraints such as roads, railways and important hedgerows. The cable route would require temporary haul road and other area set aside for flood mitigation and as a result the effected swathe would vary between 20 and 46m wide.
24. The proposed Converter Station at Saxmundham would convert the High Voltage Direct Current to High Voltage Alternative Current in preparation for feeding into the National Grid. This would include a main building 26m high, with the total site occupying 8.1ha. Proposals are included for a comprehensive landscape scheme to lessen the visual impact and provide increase public access to the area.
25. The High Voltage Alternating Current (HVAC) cables would then be routed to the proposed National Grid Electricity Transmission (NGET) Kiln Lane substation. The Kiln Lane substation would either be constructed as part of the LionLink project or would be provided utilising and extending a consented substation which is currently under construction as part of the Scottish Power Renewables East Anglia Two and One North Offshore Wind Farm projects. The transmission of the AC electricity requires more cables and therefore the cable swathe is much wider and would vary between 27 and 63m wide.
26. A similar scenario would happen in the Netherlands along with the addition of an offshore wind farm including an offshore converter station as well.

27. Links are provided in the Further Information section of this Report to the Council's and NGVs websites where fuller descriptions are provided.

## Consultation Response

### Key issues

- a. In accordance with its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy, the Council recognises that significant new infrastructure is required to ensure energy security, deliver growth, transport resilience, jobs and prosperity, and adapt to the challenges of a changing climate faced by the UK, and the communities and environment of Suffolk. However, projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary compensated for.
- b. An interconnector with the Netherlands linked to a Dutch Offshore Wind Farm would strengthen energy security although it would still be vulnerable to actions of a hostile third-party state in particular in respect of the undersea cables being cut.
- c. The choice of Walberswick for a landing site and the long HVDC cable route to Saxmundham is not supported and is considered wholly inappropriate. It is no surprise that significant detrimental noise impacts have been identified as a consequence of the need to carry out construction on a continuous basis including night-time working. This would of course raise concerns in respect of public health. Furthermore, the landing site and HVDC cable route are highly sensitive in terms of built heritage, archaeology, ecology, tourism, highways access, public rights of way, water courses and vegetation loss.
- d. The County usually encourages developers to coordinate their efforts and if the cable route were to be constructed and it could follow the HVDC routeing option that closely follows part of the route of the Sizewell link road without prejudicing the commissioning of that project then in principle that approach would be preferable as opposed to continuing across unspoilt farmland.
- e. The proposed converter station at Saxmundham would be countersunk into the ground but nevertheless would be a very large building that would initially give rise to significant adverse visual impacts. However, a comprehensive landscaping scheme is proposed for that site which would over time soften the appearance of the building and surrounding equipment and eventually totally obscure it at least from some viewpoints. The converter station will potentially share the site with a similar converter station for the NGET Sea Link development. The landscaping proposals do however take account of that scheme. The proposed landscaping scheme is to be commended as it seeks to recreate the earlier agricultural landscape with hedgerows, trees, woodland, wetlands and areas for public access.
- f. It is noted that LionLink proposes using the same highways access route to the Saxmundham Converter Station site as Sea Link, which would involve using the existing road bridge over the railway at Benhall and a new permanent road bridge over the River Fromus. Questions remain over the

structural integrity of the Benhall Bridge and the private haul route which would cross the Fromus would impact on the setting of Hurts Hall.

- g. LionLink construction is highly likely to have a detrimental impact on Suffolk's ability to respond effectively to a radiation incident at Sizewell B due to the impact on the local highways network. This is a cumulative impact with other NSIPs and further work is required to identify potential mitigation.
- h. The curved roof design option for the proposed Converter Station appears to be combining some positive elements of modern, agricultural buildings with a more contemporary design, which responds to the gently undulating surroundings and softens the appearance of the structures, as shown in the East Elevation. In the North Elevation, the difference to the agricultural approach becomes less pronounced.

The Council considers that, combined with sensitively chosen materials and finishes, this design approach may be able to deliver modern infrastructure with a sympathetic and location-appropriate appearance. The Council therefore considers that this approach should be further explored.

Overall, the Council considers that the Curved Roof approach promises to be the most sympathetic, yet unapologetic approach. Elements of the other approaches, such as facade treatments and detailing could be incorporated, especially on elevations, where the curvature of the roof is not visible.

- i. In terms of the options for HVDC route between Saxmundham and Kiln Lane coordination is normally the chosen option unless significant adverse environmental impacts would occur as a result as described in this case.
- j. The Kiln Lane substation was consented as part of the Scottish Power Renewables (SPR) East Anglia North One and Two offshore wind farms Development Consent Orders. These projects are currently under construction and include the NGET substation which would provide a connection to the wider national electricity grid with some additions required for LionLink. The NGET Sea Link proposal currently undergoing Examination in Public also proposes to connect to the same substation. One of the challenges is that should these and further consents be forthcoming connecting those schemes without destroying SPRs consented landscaping scheme.
- k. It is noted that an alternative offshore cable route is proposed to avoid a newly designated sand and gravel extraction area. The County supports the avoidance of offshore gravel extraction areas which make a valuable contribution to meeting local, regional and national need for aggregates.
- l. There are multiple large scale infrastructure projects located within the East Suffolk area. Restricted working hours avoiding Saturday afternoons, Sundays and Public Holidays is seen as being essential in order to provide a period of respite to local residents.
- m. In a similar vein a two-stage management plan process is recommended whereby an outline plan is approved alongside the Development Consent Order. The detailed stage would then apply to the various phases of the development.

- n. The temporary impacts arising during construction of multiple projects on local communities is of concern. This impact can be the result of normal construction activities caused by construction vehicles, construction workers vehicles and other fixed and mobile plant. Issues such as road closures, destruction of trees and hedgerows, flooding from construction sites during heavy rain, pollution of water courses, noise and light pollution, and mud on the road can be an issues. Once built, projects if inappropriately designed, may continue to cause anxiety as a result of noise creep, planting failures and poor design.
- o. The provision of community benefits is a recognition that host communities are bearing a load, in that they are living with substantial new infrastructure and change, on behalf of the rest of the population. However, it is not sufficient to just hand out community benefits. Benefits will only be accepted and supported if the process by which they are delivered is genuinely participatory, creating the opportunity for a productive dialogue between project promoters and communities.

## **Proforma**

- 28. The Councils response to this Statutory Consultation includes a completed proforma questionnaire provided by NGV which is included in Appendix A of this Report and provides further context for the Key Issues identified above.

## **Detail technical comments**

- 29. Detailed technical comments are listed below and provide a more detailed analysis of the proposals.

## **Archaeology**

### **Specific comments on submitted documents:**

#### **PEIR Non-technical summary**

- 30. 5.2.36 There is high potential for a large number of additional non-designated heritage assets to be defined during ongoing archaeological assessment work which will change this baseline.
- 31. 5.2.40 This comment relates only to the known heritage assets currently recorded within the proposed order limits, but overlooks the potential for additional archaeological remains to be defined during ongoing archaeological assessment work. These are of as yet unknown significance and so the effect of construction works upon them is unable to be assessed until full evaluation work, including trial trenched evaluation, has been completed. There is a potential for nationally significant remains to be defined upon which construction impacts would be significant and also not acceptable should Preservation in Situ (PIS) be the most appropriate mitigation. In this instance, instead of excavation, design changes may be required to mitigate effects.
- 32. 5.2.41 There is a danger of potential impacts to any areas designated to be mitigated through PIS, should any works involving below ground disturbance be required in these areas/if management plans are not followed during operation, maintenance and decommissioning.

## **PEIR chapter 11:**

33. 11.1.1 This only relates to currently known heritage assets. There is high potential for a large number of additional non-designated heritage assets to be defined during ongoing archaeological assessment work which are of unknown significance and therefore the potential impacts of this scheme upon all surviving below ground heritage assets within the order limits is not known at this stage.
34. Table 11.2 We would advise that policy requirements are unable to be met until full evaluation has been completed given the potential for significant additional archaeological remains to be defined as part of this work. DBAs and assessments need updating once this work has been completed.
35. Table 11.6 Non-designated heritage assets should be scoped in for the operation stage (not just with regards to setting) due to potential impacts to any areas designated to be mitigated through PIS, should any works involving below ground disturbance be required in these areas/if management plans are not followed during operation.
36. 11.5.5 A major limitation with the HER data used for the assessment at this stage is that a lot of recent archaeological work has taken place in the immediate vicinity of the order limits as part of other Major Infrastructure schemes in the area, the results of which are not yet available on the HER, and therefore searches are missing a lot of additional heritage assets which have now been identified. In addition, given large parts of the order limits have not been subject to full archaeological evaluation, there is high potential for additional archaeological remains to survive but which are not yet known about.
37. 11.6.5 and 11.6.6 Some additional non-designated heritage assets have now been defined within and immediately adjacent to the order limits during recent archaeological work- some of these remains are of at least medium value. The Council do not agree with the significance which has been appointed to all remains.
38. 11.6.17 Due to so many large schemes of archaeological work taking place in the immediate vicinity of the project, this is incorrect. There is high potential for a large number of additional and as yet unknown heritage assets to be added to the current baseline in the near future (which we already know is missing a large number of recently discovered archaeological remains).
39. Table 11.11 HE:2 Full and thorough evaluation is needed to inform decisions regarding final scheme design, to ensure that PIS can be secured for any additional archaeological remains of high significance which are defined during this work.
40. HE:8 -HE:11 Early and full archaeological evaluation will be essential to achieve these aims so that all heritage assets within the order limits which will be impacted upon by the scheme can be identified at the earliest opportunity. Provision will need to be made for the production of an OWSI setting out the strategy for ongoing archaeological assessment and suitable mitigation provisions, supported by an appropriately worded DCO Requirement should consent be granted.

41. HE: 12 Provision should be made for the production of a Historic Environment Management plan (HEMP) setting out the measures to ensure the long-term protection of any archaeological remains to be mitigated by PIS, during pre-commencement and construction works, site operation and maintenance and decommissioning.
42. 11.8.17, 11.8.24 and 11.8.28 Impacts could be higher than this should any nationally significant remains be defined during ongoing archaeological assessment work.
43. 11.8.31/11.8.32/11.8.33 Any maintenance works could have a significant adverse effect to any heritage assets which were mitigated through PIS at construction stage, should any works involving below ground disturbance be required in these areas/if management plans are not followed during this stage.
44. 11.8.34 If decommissioning works involving ground disturbance were to occur within any PIS areas, then this would have a significant adverse effect.
45. 11.9.2 Archaeological mitigation will need to be secured by an appropriately worded DCO Requirement and Outline Written Scheme of Investigation (OWSI) (supplemented by the appointed archaeological contractor's method statements) to be approved by the Council as advisors to the LPA, with provisions also made for ongoing archaeological assessment, reporting, publication and archiving within a suitable timeframe following the completion of on-site archaeological work.
46. 11.9.3 the Council would strongly advise the need for an ACoW to ensure the smooth running of the archaeological element of the project and to manage interactions between the archaeological, ecological and engineering teams to make sure that archaeological mitigation strategies are successfully implemented alongside other aspects of the development.
47. 11.9.4 the Council as advisors to the LPA would have responsibility for approving all archaeological documentation and overseeing/signing off fieldwork to ensure that it undertaken to correct standards and fulfilling the requirements of the DCO Requirement and approved OWSI.
48. Table 11.12 Unless archaeological remains of national significance are defined during ongoing archaeological assessment work, for which PIS is the most appropriate mitigation.
49. 11.11 A mechanism for monitoring of the implementation of the HEMP for PIS areas throughout construction, operation and decommissioning will need to be in place.

**Desk Based Assessment (DBA) and gazetteer:**

50. A significant amount of additional archaeological heritage assets than are presented in the DBA are now known to be present both within the order limits and the immediate vicinity of the scheme. This is on the basis of the geophysical survey which has been undertaken for the project, initial phases of trial trenched evaluation in some parts of the scheme and recent archaeological investigations as part of the Sizewell, Sea Link and EA1N/2 projects, the results of which are not yet available on the County Historic Environment Record (HER). This work has identified remains from all periods and so there is a potential for multi-period archaeological remains relating to a

variety of activities to be present throughout the order limits. The results from other nearby projects illustrate how much information is added to HER data through systematic survey, as a significant number of archaeological sites have been defined which were not previously recorded on the County HER, or were only recorded as finds scatters or cropmark features.

51. Given the interaction with the Sizewell, Sea Link and EA1N/2 projects, ongoing assessments should include the results from these projects, especially for those areas where the schemes overlap or are in close proximity, given the findings directly relate to the archaeological potential of this scheme. Some of the data from these schemes is publicly available and the Council are also happy to advise on the findings where reports are not yet available, however, the Applicant is advised to secure data sharing agreements with all these parties to assist in this matter.
52. Judgements made regarding the significance of various heritage assets in both documents is questionable without further evaluation, especially for cropmark and finds scatter sites, and is underplayed for a number of sites.
53. There should not be an assumption that data within the Historic Environment Record (HER) is of local significance. The Historic Environment Record includes non-designated assets of national importance and regionally significant assets. Sites of archaeological potential which have not yet been subject to systematic assessment (and are therefore currently of unknown significance) should also be considered.
54. KND 009 Buxlow Church site and WLB 010 the original Walberswick church site should be considered to be of high importance as they have the potential to be of national significance, depending upon preservation and associated remains.
55. DBA 4.1.9 The potential for Anglo Saxon funerary activity should also not be overlooked as two previously unknown Anglo-Saxon cemeteries have been defined immediately adjacent to the order limits along the Sizewell Link Road.

**General comments:**

56. As a general comment, there is high archaeological potential for all parts of the current order limits, the majority of which have not yet been subject to systematic archaeological investigation, therefore full archaeological assessment is required at the earliest opportunity. The results from other Major Infrastructure projects taking place in the immediate vicinity of this scheme are also showing that there is an enormous amount of important archaeology surviving in this landscape, much of which we previously knew nothing about until full archaeological assessment was undertaken.
57. Within the areas of the order limits which have already been subject to full archaeological evaluation, these investigations have defined multiple, previously unknown, sites of local and regional archaeological significance, requiring appropriate mitigation should consent be granted.
58. The Saxmundham Converter Station Site (CSS) 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 some straddle the areas which the different parties are responsible for. Mitigation in these areas 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 that area (as it would not be appropriate for individual mitigation areas to be dug in separate phases given the nature of remains present). An awareness from both parties is also needed regarding the location of all areas of required archaeological mitigation within the CSS to avoid any ground disturbance taking place in areas where archaeological mitigation remains outstanding but is the responsibility of the other project.

59. At the Friston Substation Site (SS), numerous sites requiring archaeological mitigation have been defined as part of the EA1N/2 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 LionLink. As such, provision will need to be made by LionLink to mitigate any remaining areas of previously defined archaeological interest within the Friston site which will see disturbance as part of this scheme (or will not subsequently have been mitigated as part of the Sea Link project) and will therefore no longer be able to be preserved in situ.
60. 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 the Council would also expect that no works involving ground disturbance should be undertaken in this part of the DCO Order Limits as part of the LionLink project, in line with agreed preservation in situ requirements set out in the EA1N/2 archaeological PIS management plan.
61. Full archaeological evaluation has been completed for the Walberswick landfall site and the section of the cable corridor which runs between this site and the junction with Dunwich Road. Multiple areas requiring mitigation through excavation have been defined, however, the areas to the south of Walberswick which have been defined as the most archaeologically sensitive, including the site of the original church and early settlement at Walberswick (WLB 010) considered to be of probable national significance, have been omitted from works areas which the Council strongly supports. This area is however still within the order limits and so appropriate measures will need to be put in place to secure long term PIS during construction, operation and decommissioning works associated with the scheme.
62. One further section of the cable corridor route, known as 'Pond Field', has also been subject to trial trenched evaluation and further areas of archaeology requiring mitigation have also been identified within this section of the order limits.
63. At the Yoxford Road crossing in Middleton, archaeological remains of high sensitivity and significance have been shown to extend into the LionLink order limits during works associated with the Sizewell Link Road. Any works involving below ground impacts must be avoided in this area as part of the LionLink project in order to achieve PIS, although this site is currently within a section of the route where directional drilling is proposed. Directional drilling beneath this site is not supported due to the nature of the archaeology

present and in order to avoid any potential impacts from bentonite breakouts etc. As such, the line of the directional drill in this area should run as far to the east of the order limits in this section of the route as possible, in order to avoid this significant site entirely.

64. It is essential that further refinement of the design of works areas within the order limits should include the results of full archaeological evaluation to enable the impact of the proposed development on heritage assets to be properly considered and to allow appropriate mitigation strategies, which include PIS where necessary, to be secured. Sufficient flexibility must be retained in scheme design until these assessments are completed to allow for modifications to be made should any archaeological remains of national significance be defined.

**Further assessment required:**

65. The desk based-assessment which has been submitted is adequate for PEIR stage, but at EIA stage should be updated to include the recent archaeological findings from nearby projects and should also include a historic map regression, a study of aerial photography (including historical imagery), an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Attention should also be given to assessing the relative importance of any military remains in relation to the defensive coast. If earthwork survey is identified as being appropriate for any areas within the order limits, then provision should be made to undertake this work as part of the EIA.
66. 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.
67. Although geophysical survey has now been completed for the order limits, a large proportion of the cable corridor, as well as land parcels around the Saxmundham CSS and Friston SS sites, have not been subject to full trial trenched evaluation and therefore, the character, extent and significance of surviving below ground heritage assets across these parts of the scheme have yet to be defined. There is high potential for additional, and to date unknown, significant heritage assets to survive across much of this area. Some of these may be of national significance and worthy of preservation in situ. As such without further assessment to fully characterise the heritage resource, the impacts of the development upon below ground heritage assets cannot be fully understood. Trial trenched evaluation, accompanied by metal detecting, must therefore be undertaken for the remainder of the order limits where works are currently planned, at the earliest opportunity, with appropriate provision made for palaeo-environmental assessment in river valley areas as necessary.
68. All onshore elements of the scheme (for example, landfall sites, converter station sites, grid connection substation site, underground cable corridors, jointing bays, link boxes, Horizontal Directional Drilling (HDD) pits and any other impacts associated with the scheme for example, haul roads, compounds, services, planting and ecological mitigation, offsite transport improvements etc.) have the potential to damage or destroy any surviving

archaeological remains, so all elements of the scheme should be scoped in for archaeological assessment. As well as impacts during pre-commencement and construction works, activity during site operation as well as decommissioning work (including any associated site compounds) will need to be scoped in for a consideration of archaeological impacts given the potential for remains which will need to be preserved in situ and will therefore need to be protected from disturbance throughout all phases. Provision must also be made for additional trial trenched evaluation should further areas where works involving ground disturbance are planned be added to the scheme at a later date or if significant archaeological remains are defined during the course of archaeological evaluation work and which require alternative routing/design options to be considered.

69. An initial programme of Ground Investigation assessment work has shown that some areas of the scheme, including landfill, have the potential for remains of geoarchaeological significance and therefore require an ongoing programme of geoarchaeological work to properly assess deposits and allow the potential impacts of planned works in these areas to be fully understood.
70. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and to contribute to risk management. Upfront work will ensure all options can be properly considered and the scope of mitigation defined (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 for development of planned works areas, given the reduced flexibility for mitigation through design once fixed locations have been determined for different elements of the scheme. Early work will also enable archaeological work to be designed alongside other elements of the scheme, e.g. to inform ecological mitigation or drainage design and also spoil and dust management.
71. The combined results of the above assessments should then be used to develop a mitigation strategy. Some areas (as yet unidentified) may require localised preservation in situ 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.
72. All phases of archaeological evaluation and mitigation must be led by a brief produced by the Council and subject to detailed Written Scheme of Investigations (with the production of an OWSI at application stage setting out the overall strategy for ongoing archaeological assessment and mitigation work for the project), which must be agreed with the Council. All stages of the work will be monitored by the Council on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled.
73. 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 within the order limits, must be protected

from damage during pre-commencement or construction works and throughout site operation and decommissioning. 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 the Council, to secure the appropriate management of these areas within the development going forward.

74. Provision should be made for a detailed Archaeological Outreach Strategy plan/document, to be agreed with the Council. It is expected that the Applicant should demonstrate a commitment to delivering enhanced public understanding.
75. As has been shown by other Nationally Significant Infrastructure Projects in the region, time will be a critical factor. Archaeological and heritage assessments and mitigation phases should be programmed into the project at the earliest opportunity, with sufficient time allowed to enable archaeological work to be completed in advance of the start of pre-commencement and construction works, so as to avoid any delays to the development schedule.
76. We would advise that an archaeological clerk of works (ACoW) is employed at post-consent stage to ensure the smooth running of the archaeological element of the project and to manage interactions between the archaeological, ecological and engineering teams to make sure that archaeological mitigation strategies are successfully implemented alongside other aspects of the development.
77. Numerous large projects are currently being undertaken in Suffolk which is putting pressure on available archaeological work forces and is something to be aware of.

## **Ecology**

78. All ecological surveys should be carried out by suitably qualified ecologists at the appropriate time of year in order to attain as accurate a baseline as possible.
79. Survey results should be sent to Suffolk Biodiversity Information Service (SBIS).
80. The Council’s Ecology Team are concerned about the cumulative effects of LionLink alongside all other NSIPs in this area of the county (Sea Link, Sizewell C, offshore wind farms).
81. The probable loss of ecological connectivity resulting from the construction works needs to be managed appropriately to maintain habitat connectivity as best as possible.
82. Potential cumulative impacts on Red-throated Diver and other marine birds resulting from the undersea cabling for both Sea Link and LionLink should be assessed and appropriate mitigation measures should be drawn up.
83. Impacts on habitat loss on farmland bird species (Bullfinch, Yellowhammer, Skylark, Woodlark) needs assessing and mitigation measures drawn up.

There is potential for Skylark plots and compensation planting of arable margins.

84. The Council are keen to see the various survey reports as and when they become available. Species surveys carried out were listed in the pre-stat consultation meeting in December 2025.
85. The Council have concerns about the impact on marine species that live/feed on the seabed that will result from the potential ploughing of the seabed to ensure the cable route is clear of debris. Removal of significant debris by a ship-mounted crane would be preferable to minimise these potential impacts.
86. How will potential impacts on the seabed during the pre-lay grapnel run be minimised?
87. Any compensation measures for this operation?

Habitat Regulations Assessment comments:

88. 2.2.16 – the pre-lay grapnel run sounds a fairly destructive operation – can other techniques be employed that are less damaging to the seabed? How will impacts on marine habitats and species be managed?
89. 2.2.17 – Will the pre-sweeping of established sand waves ahead of the cable laying have impacts in terms of the speed/location of coastal erosion? How will this be mitigated?
90. 2.2.17 – the Council have concerns about dredging the sea bed and the impacts on ecological features (particularly in relation to the Southern North Sea SAC). How will these impacts be managed? Are there alternatives to dredging that are less invasive/potentially harmful to marine species?
91. Will there be reinstatement of the seabed following the cable laying especially if there is pre-lay ploughing taking place?
92. The Council are aware of the NGV commitment to delivering BNG as part of the scheme and feel this is welcome – will this BNG commitment include the seabed/marine habitats that will be impacted by the cable laying operations such as ploughing, sand sweeping and jet trenching?
93. Impact of the electromagnetic field emissions on harbour porpoise, seals and other cetaceans should be assessed and appropriate mitigation measures implemented.
94. 2.3.20 – HDD should be the preferred option for the installation of the HVAC – less destructive and lower impact potential on protected species and habitats.
95. 2.3.31 – lighting at the landfall site during construction works – this should be assessed with regard to impacts on bats, birds (both sea based and terrestrial), mammals (otter, seals, badger, hedgehog) with robust mitigation measures implemented where required.
96. 5.2.51 – the list of onshore habitats for the proposed onshore scheme does not list reedbed, which is a habitat adjacent to the proposed landfall site. Species such as Grasshopper Warbler (red-listed species) and Cetti's Warbler (Schedule 1 species) have been observed in this habitat.
97. Curlew are also present within the proposed limits of the onshore scheme (red-listed species) and should be considered in the HRA.

98. 5.2.83 – water quality – appropriate mitigation measures should be put in place for the landfall site south of Walberswick. The landfall location is close to both sensitive marine and freshwater habitats, including reedbeds.
99. 5.2.83 – assessment of pollution incidents on species such as otter, water vole and European eel need to be assessed and robust mitigation measures drawn up to minimise any potential impacts on these species that may result from accidental pollution incidents.
100. 5.2.102 – baseline ornithological surveys may not have recorded qualifying species for the Walberswick-Minsmere SPA (Nightjar, Bittern, Hen Harrier) but red-listed species such as Grasshopper Warbler, and schedule 1 species such as Cetti's Warbler have been recorded in the reedbed adjacent to the proposed landfall site.

## **Economy, Skills and Tourism**

### **Socio-economic/ tourism perspective.**

101. As per previous submissions, there is still concern that the cumulative effect of LionLink, Sea Link, Sizewell, Norwich to Tilbury and other NSIPs will have a detrimental effect on aspects of the visitor economy.
102. There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C.
103. At the time of writing, 2000 workers are already onsite for Sizewell alone. Whilst there is some short-term benefits to be made for the accommodation sector and wider visitor economy, we need to ensure that we have a viable tourism economy once all NSIPs are complete. The sector has expressed concerns and the need to ensure that Suffolk still has a tourism economy which is attractive and accessible to visitors.
104. The applicant needs to consider the practical aspects of how the construction phase would impact the visitor experience in a number of areas.
105. **Perception-** Is Suffolk likely to be viewed as a viable place for a short break or holiday? Word of mouth, particularly in an age of TripAdvisor and/or social media, can quickly lead to negative experiences and perceptions becoming widespread. Excess traffic and diversions create bad first impressions on arrival. Add to this excess noise, road closures, visual blight during construction phase and afterwards) etc and Suffolk could acquire an image which would be problematic. This in turn has the potential to lead to people holidaying elsewhere or at the very least not returning in the short to medium term.
106. **Practical effect on tourism businesses-** Roadworks, delays, road closures etc all pose issues for businesses. The visitor economy relies on shift workers as well as prompt deliveries of fresh food and other supplies. If these need to be accommodated, then they need to be planned for and mitigation measures need to be put in place to ensure that these can be overcome.
107. **Timescale.** Whilst Suffolk welcomes visitors all year round and is a popular out of season weekend and short break location, there is clearly a traditional "high season" of July- early September where visitor numbers are at their peak. Whilst we strive to have good public transport links, we need to acknowledge that the bulk of visitors will travel by car and so traffic will be heavier during the

peak period. There needs to be a balance struck between accommodating visitors, while acknowledging the practical benefits of a construction project taking place when the weather is good.

108. **Marketing and publicity** - If NSIPs are likely to happen, then there needs to be adequate notice given and the operators need to work with the sector to ensure that the messages convey the fact that Suffolk is still open for business and welcoming visitors. Sizewell C has a tourism mitigation fund, which is working with the sector to convey such messages. As part of this work, it is carrying out perception studies and collating baseline data on visitor numbers, spend etc across the district, in order to measure the effects on individual businesses, towns and the county as a whole. Organisations such as the [Suffolk Coast Destination Management Organisation \(DMO\)](#) and the [Suffolk and Norfolk Local Visitor Economy Partnership \(LVEP\)](#) will be useful sources of support and information.
109. On a **wider economic point**, we also need to consider where the workforce and materials will be drawn from for this and other NSIP initiatives. Again, coming back to the point about the cumulative effect, we need to be mindful of how LionLink will work alongside the other projects.
110. While we would obviously want to see the economic benefits for the Suffolk ( and an appropriate sourcing tool might be something like the [Suffolk Supply Chain](#) ) we need to ensure that we are able to provide the labour and materials when required. If done effectively, then it will be a welcome boost for Suffolk businesses and employment figures. If materials and workforce are to be transported into Suffolk, then we need to return to the point about additional traffic on the county's roads and pressure on bedspaces. Whilst we welcome the economic and practical benefits of the LionLink scheme, we need to ensure that any potential disbenefits are considered and effectively mitigated against.

## **Skills**

111. The Council notes positively that the Applicant has scoped employment and the labour market into the assessment for construction, operation and decommissioning (Table 16.6). This forms an essential basis for evaluating LionLink's workforce implications given the scale and cumulative nature of energy infrastructure activity in Suffolk. The Council also welcomes the Applicant's acknowledgement that construction is likely to generate a positive economic impact with beneficial effects on employment and the labour market (paragraph 16.8.4). However, such benefits are not guaranteed and must be secured through clear commitments, appropriate governance and sustained delivery throughout the project lifecycle.
112. To ensure that local employment, skills development and supply chain benefits are realised in practice, not simply identified in principle, the Council expects the Development Consent Order to include a binding Employment and Skills Plan (ESP). This plan should be fully funded by the Applicant and set out commitments on local labour, apprenticeships, T Level placements, "earn and learn" programmes, supply chain participation and long-term skills development. It should include annual reporting, defined governance arrangements and a dynamic framework for monitoring skills, employment and education outcomes. The Council notes that the Applicant's monitoring proposals do not currently provide this level of commitment (section 16.10). A comprehensive ESP is essential to ensuring LionLink contributes meaningfully

to Suffolk's long term skills legacy and supports the management of cumulative workforce pressures arising from multiple NSIPs.

113. The Council's methodology expectations are detailed in the Energy and Climate Adaptive Infrastructure Policy and its Supplementary Guidance on the Socio economic Effects of NSIPs. These sources have not yet been included in the Applicant's legislation and policy framework (section 16.2). The Council expects the Environmental Statement (ES) to address this by drawing on a fuller evidence base, including the Technical Legacy Report for Norfolk and Suffolk, to ensure LionLink's socio economic assessment reflects Suffolk's distinctive labour market conditions, rather than relying predominantly on national averages such as those referenced in the HCA Additionality Guide (paragraph 16.4.27).

The Council expects the ES to include a detailed, disaggregated workforce model. While the PEIR identifies an indicative peak workforce of 669 workers for the Full Build Out scenario (paragraph 16.8.3), the ES should expand this into a phase by phase breakdown covering civils, mechanical and electrical, commissioning and other major components. This modelling must align with The Council's five stage methodology and include scenario testing for home based labour supply, informed by Suffolk specific insights into workforce capacity, training provision and employer readiness.

114. The Council welcomes the Applicant's acknowledgement of potential labour displacement, including interactions with other NSIPs requiring similar skills (paragraph 16.8.6). The ES should now develop this into a cumulative labour market impact assessment, modelling LionLink's workforce demand alongside that of other NSIPs. This cumulative assessment must explain how the Applicant will mitigate displacement risks such as wage inflation, competition for specialist labour, impacts on local services and disruption to existing employers. Sensitivity analysis must reflect Suffolk's unique labour market structure, including documented skills shortages across key sectors and the demographic profile described in Table 16.11, which highlights high economic inactivity and above average proportions of older residents in several wards. For these reasons, the Council does not support the Applicant's early indication that socio economic effects are unlikely to be significant; such conclusions must be grounded in Suffolk specific evidence and cumulative demand modelling.
115. The Council expects training, skills and employment opportunities arising from the project to be formalised and expanded within the ES. In particular, the Council expects the Applicant to deliver and fund activities that develop local talent; align training provision with regional labour market needs; commit to 5% of project roles being delivered through "earn and learn" pathways, such as apprenticeships and graduate programmes; and provide a minimum number of apprenticeships specifically for Suffolk residents. The Council also expects the Applicant to ensure that skills developed during LionLink's construction are transferable across the region's wider programme of infrastructure projects, supporting a sustained skills legacy.
116. Alongside direct workforce interventions, the Council expects LionLink to support the growth and diversification of the local labour market. This includes embedding skills and employment commitments throughout the supply chain using contractual requirements, integrating social value measures into procurement processes, and developing measurable indicators to track

progress in local recruitment, training and apprenticeships. These commitments should be consolidated within the Employment & Skills Plan and supported by supply chain skills plans, demonstrating a coordinated approach to workforce development across all phases of the project. The approach must also respond to emerging labour market evidence and reflect Suffolk's economic characteristics.

117. A key mechanism for achieving a coordinated regional approach is the Regional Skills Coordination Function (RSCF), which the Council expects the Applicant to engage with proactively. The RSCF plays a central role in aligning developers, training providers, employers and local authorities to provide a cohesive, strategic and forward looking approach to workforce planning and skills development. It helps ensure that major projects have access to the right skills at the right time, reduces duplication, strengthens training provision, mitigates displacement and supports long term skills development for Suffolk residents. Given LionLink's position within an already crowded NSIP environment, active participation in the RSCF is essential for avoiding labour shortages, coordinating training interventions, and ensuring a sustainable skills legacy.
118. Through these measures, the Council anticipates that the Applicant can maximise local benefits while managing the complex cumulative impacts associated with multiple large-scale infrastructure projects in Suffolk. The Council remains committed to engaging constructively with the Applicant to ensure that LionLink delivers positive and lasting outcomes for Suffolk's workforce, skills system and communities.

## **Highways**

119. Highway concerns
120. The Council expresses disappointment that the onshore cable elements could not be combined with other projects to reduce overall impact, albeit at the risk of increasing cumulative traffic on the A1094 corridor.
121. Construction traffic using a number of routes for HGVs and workers:
  - a. B1387 is a single access into Walberswick and significant variation of traffic over the year due to tourism
  - b. Lyballs Lane – suitability of narrow country lane for construction traffic
  - c. Use of B1119 as emergency route to SZB
  - d. Cumulative impact on the A12, B1121, B1122 and A1094
122. A lack of data to make evidenced comments. For example, without construction traffic data the authority cannot assess if this project is of a similar scale to SPR EA1(N), EA2 or Sea Link.
123. The traffic study area is insufficient based on the Council appreciation of scale of the construction traffic and cumulative impact of this on the highway network.
124. The proposed working hours and disruption to the local community.
125. Clarity of the examination process with regard to consultation of traffic regulation orders (TTRO)

### Co-ordination with SZC Sizewell Link Road (SLR)

126. The Council understands that construction of the SLR will start in Feb 2026 and take around 2 years at which time the road will be adopted as public highway. The Council would not accept any covenants or restrictions placed on land along the 63m or 94m wide cable corridor that would fetter future maintenance or improvement of the highway or impact on landscaping judged necessary or beneficial to making the SLR acceptable in planning terms.

### Access to Kiln Lane Substation.

127. Care is needed in the transport assessment that the traffic data is relevant, particularly in terms of cumulative impact for construction of the substation as this may be delivered by others.

128. LionLink relies on access to the substation via the B1121 Saxmundham Road north of Friston and the convertor station via the River Fromus Bridge south of Saxmundham constructed by SPR and Sea Link (if consented) respectively. Support in highway terms for use of the River Fromus Bridge is dependent on a long-term solution being found to improve the load carrying capacity and is not acceptable if temporary structures are needed for ALL use and resolution of other matters such as ecology, landscaping and historic environment.

### Landfall

129. The Council remains concerned about how vehicular access will be gained to the landfall site recognising the constrained highway network in Walberswick, including any needed to access the bridge in the event of a leakage of HDD drilling fluids.

### Pre-commencement

130. No information is provided regarding what activities are considered in the pre commencement phase. Some activities such as surveys, sit clearance or archaeology generate traffic and require temporary access. Provision of safe access can give rise to impacts such as vegetation removal or temporary traffic regulation or management.

### Haul Road

131. Importing and removal of the haul road is a main constituent of HGV traffic associated with onshore cable routes. The Council would support any innovation to reduce dependency on imported aggregate or sustainable delivery methods.

### Working Hours

132. The Council will not support construction during Sundays and Bank Holidays. The local economy relies considerably on all year round tourism, both short stay and day trips with a significant increase in road traffic during holidays and weekends. Disruption to residents will also be significant without suitable breaks in construction. It is noted in TT10 Table 17.10 that no HGV deliveries are to be undertaken on Sundays and Bank Holidays. For clarity this should include all HGV movements not just deliveries, for example no export of spoil.

133. Section 8.2 of the transport assessment does not include timing of construction vehicle movements although it may be that this is controlled by a requirement in the DCO.

## Construction Workers

134. It is not clear if the 500 people quoted includes both the cable corridor and the convertor station considering that a maximum of 669 are required for the substation. The majority of the project is located away from areas with reasonable levels of public transport, except for Saxmundham Railway Station. This will make use of sustainable travel practices difficult and increase the number of worker vehicles on the network. The Council would support measures such as the use of crew busses or park and ride facilities to reduce worker trips.

## Construction

135. The Council concurs that the impacts of the project in terms of transport will be significant. The use of data and analytical assessment are preferred over qualitative assessment or professional judgements.
136. Until full details are provided the Council will expect both an Environmental and Transport Assessment to be undertaken. The former should use the Environmental Assessment of Traffic and Movement - Institute of Environmental Management and Assessment Guidelines, 2023 and the latter consider such aspects as road safety, link and junction capacity. The Council's local guidance on the transport impacts of NSIPS should be used <https://www.suffolk.gov.uk/asset-library/TransportTraffic-InfraPolicy.v4.2.pdf>.
137. Noting the limits on the accuracy of traffic data survey some flexibility should be considered when applying rule 1 and 2 in the IEMA guidance (17.4.29).
138. The Council notes that a peak construction year of 2030 is similar to Sea Link and will be at or around SZC's peak year of construction. As stated elsewhere one of the Council's key concerns is cumulative impact, not just coincidence of individual peaks but the total cumulative impact outside these times.
139. The Council is concerned that the number of projects with shift changes immediately before the am peak and after the pm peak may displace the peak to these hours and that the assessment in 17.4.12 may need to be broadened. Care should be taken that some locations e.g. B1121/B1119 crossroads in Saxmundham do not also suffer from capacity issues outside weekday network peaks.
140. Traffic study times of 0700-1000 and 1600-1900 may miss the time at which the project has greatest proportional impact in terms of HGVs. Certainly, periods in the middle of the day may include the greatest numbers of vulnerable users.
141. Unless controlled the Council's experience is that HGVs are not evenly spread over the day with a greater proportion travelling in the morning with few movements in and after the pm peak.
142. The Council needs traffic data to comment on likely driver delay 17.9.11 and traffic flows (capacity) 17.9.12.
143. With respect to the likely catchment area for workers (TA 7.2), the Council would raise concerns about the availability of skilled workers in the region due to the number of NSIPs and that this may significantly increase the distance travelled placing greater pressure on the major and strategic road networks or local rented accommodation.

### Operational Phase

144. Whilst traffic associated with workers maintaining the project infrastructure is unlikely to be significant and, subject to further detail, may be scoped out the Council is of the view that AIL movements during the operational phase should be scoped in particularly if the Benhall Rail Bridge remains weak and temporary overbridging is required. AILs should be scoped into table 17.6 for the operational phase.

### Outline Construction Traffic Management Plan (OCTMP)

145. No OCTMP is provided in the PEIR so the Council cannot comment on this matter.

146. AN OCTMP is expected to provide:

- a. Evidenced volumes of workers and totals of the vehicles they use
- b. HGV volumes, routes, timing and emission controls
- c. Delivery management system for HGVs

147. Numbers, sizes and feasible routes for AIs from the SRN or a port of origin to the site including assessment of all structures on that route are required. the Council would question the feasibility of moving all AILs off peak noting the length of the likely route and police restrictions on nighttime movements. Without suitable level of assessment, the applicant will not be able to identify which structures need temporary overbridging and hence contribute to delays relating to temporary over bridging or other measures.

148. Details of monitoring, controls and enforcement to ensure that the volume of traffic assessed in the Environmental and Transport Assessment are not exceeded.

### Transport Study Area (Fig 17.2)

149. The study shall include all of the local highway network impacted by this scheme. For example, the cumulative impacts on the A12 between the A14 at Seven Hills and Lowestoft are of concern to the authority. The study should extend to include the A1094 as far as Aldeburgh. Thus, the Council considers the study area shown in Figure 17.1 insufficient.

150. In Fig 1.2 of the draft transport assessment the branch line to Leiston is shown. For clarity this is a freight only line.

### HGV Routes (Fig 17.3)

151. Many of the HGV route from the A12 to the site are not considered appropriate.

- a. B1387 being the sole link to Walberswick and subject to high levels or recreational traffic (tourism)
- b. Lymballs Lane and Westleton Road (Darsham) are narrow country lanes unsuitable for HGVs
- c. Accesses LL-BM04, LLBM-03, LLBM02E, LLBM002C and LL-BM02D would be best served of the Sizewell Link Road but appears to use the B1122 and other minor roads.
- d. Use of the B1119 should be avoided so not to compromise the emergency access route to SZB.

- e. The B1121 through Friston is unsuitable for HGVs as is Kiln Lane. Specifically, it is difficult for HGVs to turn in or out of the B1121 from the A1094 from Snape

#### Indicative Construction Worker Routes (Fig 17.6)

152. Whilst noting that it is difficult to control workers routes unless they are using dedicated work vehicles the routing does concern the Council for many of the reasons raised above for HGVs. However, without any data to show the volumes of worker vehicles it is difficult to comment in detail at this stage.

#### Road closures and TTRO

153. Evidence is requested to show that 5 days sufficient for road crossing (17.9.8).
154. The assessment of construction impact should not ignore disruption caused by temporary traffic restrictions, particularly those associated with road closures and diversions. The scarcity of major roads in this area can result in diversions of significant length. Consideration of the impact of construction traffic or works or diversions on the emergency services should be considered, including those affecting emergency access to SZB.
155. The Council's experience is that with the scale and complexity of NSIPs stakeholders frequently do not understand that the examination is in effect the consultation period for traffic regulation orders. This has created challenge during the implementation phase of several NSIPS. The Council would require that the applicant undertakes sufficient targeted consultation on traffic regulation orders to mitigate this concern.

#### Cumulative Impact

156. The Council notes that the cumulative impact of traffic and transport is not considered in chapter 28. In the Council's's view there is an inter-project traffic and transport impact in terms of:
  - a. Total traffic carried by the network and impacts such as noise, vibration, air quality, fear, anxiety, severance, capacity, delay and road safety.
  - b. That the multiple NSIPs in this region will significantly prolong these impacts.

### **Joint Emergency Planning Unit**

157. None of the proposed development falls within the Sizewell B Detailed Emergency Planning Zone (DEPZ) under Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019. Therefore, the Council will not require NGV to develop detailed plans for responding to a radiation emergency at Sizewell B to minimise and mitigate the off-site radiological consequences within the emergency planning zones.
158. The development does sit within the existing Extended and Outline Emergency Planning Zone (EEPZ – 15km and OPZ – 30km) for Sizewell B and the Council have a statutory duty under REPPiR 19 to consider the impacts of the development with respect to the existing contingency arrangements contained in the Sizewell B Off-site Radiation Emergency plan. The radiation emergency planning assumptions assumes that following an Off-Site Nuclear Emergency (OSNE), the Emergency Services and partners will need to respond effectively

to the Sizewell B station and surrounding area to implement immediate actions to protect the public, including evacuation.

159. In the event of an OSNE, the Emergency Services use the A12 trunk road to access East Suffolk with most of the vehicles and resources coming from Ipswich to the south. From the trunk road there are three routes to Sizewell B:
  - a. North. B1122 Yoxford Road from Yoxford to Leiston that is being upgraded by Sizewell C (Sizewell Link Road) to accommodate their construction traffic, including Abnormal Indivisible Loads (AILs).
  - b. Centre. B1119 from Saxmundham to Leiston. The preferred Emergency Service option, staging via a Forward Control Point (FCP) at Saxmundham Fire Station.
  - c. South. B1121 Saxmundham Road from Benhall to Friston and then B1069 Snape Road to Leiston. Earmarked for use by both Scottish Power Renewables (SPR) EA1N and 2 and LionLink NSIPs for construction and workforce traffic, plus AILs.
160. LionLink construction is highly likely to have a detrimental impact on Suffolk's ability to respond effectively to a radiation incident at Sizewell B. This is a cumulative impact of the various NSIPs (Sizewell C, SRP EA1N and 2, Sea Link and the Helios Energy Park), plus the Essex and Suffolk Water proposals for the Suffolk Water Recycling, Transfer and Storage (SWRTS) project, that include additional construction and workforce vehicles, roadworks and the associated closures and diversions. The construction works will be ongoing for some considerable time (the A12 is already subject to frequent delays adding between 15 – 20mins travel time), but once the work is completed and the projects are in operation and maintenance, the increase in traffic on Suffolk's rural road network will continue to constrain the emergency response.
161. LionLink will need to demonstrate that the development does not adversely affect the multi-agency Radiation Emergency Plan which synchronises the activities of the emergency services and other partners in response to an incident at Sizewell B. Of particular concern is the access to the converter station and the HVDC cable corridor around Saxmundham. Co-ordination with Sea Link to share the HVDC southern cable route, the converter station site and access from the B1211, plus the maximum use of haul roads is preferred to keep construction vehicles off the local road network, minimise the use of the B1119 and avoid disruption or delay on this vital route. The NSIPs should consider upgrading the Benhall railway bridge to avoid any requirement to use the Sizewell Link Road and B1119 for AILs.
162. LionLink will require detailed consultation and comprehensive route and traffic management plans, plus a mechanism of co-ordinating the increase in construction traffic and workforce with the other NSIPs. These should form part of the Requirements within the Development Consent Order.

### **Lead Local Flood Authority**

163. Comments are including in respect of the following documents:

Chapter 12 Hydrology, Hydrogeology and Drainage LLK1-ARU-REP-ENV-000012  
Version 0.0 January 2026;

Preliminary Environmental Information Report Volume 1 Chapter 12 Hydrology, Hydrogeology and Drainage LLK1-ARU-REP-ENV-000012 Version 0.0 January 2026.

- a) Surface water drainage for the proposals have not yet been considered, but they need to adhere to both the National Standards for SuDS, Ciria SuDS Manual and LLFA local SuDs guidance. LLFA would advise that a indicative surface water drainage strategy is submitted for review
- b) We'd also request that they ensure they work closely with the SPR project team, given the sensitivity of flooding in Friston, to ensure that the surface water drainage strategy aligns as it looks like there project so highly likely to be delivering the surface water drainage solution for the Kiln land Substation.

164. Comments are also included in respect of the following document:

Preliminary Environmental Information Report Volume 2 Appendix 12.1 Preliminary Flood Risk Assessment LLK1-ARU-REP-ENV-000012\_AP12.1 Version 0.0 January 2026

- a) LLFA local policy and guidance needs to be considered.including the Suffolk Local Flood Risk Management Strategy
- b) Friston Surface Water Management Plan (SWMP) is in fact called The Friston flood study is called "Friston Flood Study Report May 2020" and is not a full SWMP.
- c) FRA needs to have images from the relevant flood maps inserted for the areas of the proposed development and shall include climate change.
- d) FRA need to show the historical flood events/records.
- e) 7.4 Rainfall intensity allowances - Rainfall allowance shall be 45% not 40%, this approach has been used on all NSIPs across Suffolk including SPR and Sea Link projects.

## **Landscape**

### *Context*

- 165. The Council notes the co-location of the LionLink Converter Station site adjacent to the Sea Link converter station at Saxmundham, which is considered to reduce adverse impacts and effects on the wider landscape and visual amenity and the extent of the inter-project cumulative landscape and visual impacts and effects compared with selecting separate sites for each project.
- 166. The Council is concerned about the proposed landfall within the Suffolk and Essex Coast and Heaths National Landscape (SECHNL), at the highly sensitive location of Walberswick.
- 167. The Council notes that for development within National Landscapes the strengthened duty in s.85(A1) of CROW Act 2000 (as amended by the Levelling-up and Regeneration Act2 in December 2023) applies and that there will be a need for effective measures to address it.

### *Landfall site, Walberswick*

168. The proposed landfall site is located within the SECHNL, to the south of Walberswick, east of Stocks Lane. Chapter 13 Landscape and Visual of the PEIR identifies thirteen Local landscape Character Areas (LLCAs) within the NL; and during construction it is predicted that 10 will experience significant effects (Table 13.15 Summary of effects on LLCAs within the National Landscape).
169. The plans show the RLB and cable route passing through sections of highly sensitive areas of the Minsmere-Walberswick Heaths and Marshes, designated as SSSIs, SAC, SPA and Ramsar sites.
170. The landfall site is adjacent to residential properties to the north and to Walberswick Conservation Area which includes several Grade II Listed Buildings, including along the northern side of The Street (north of the proposed landfall site, but not directly adjacent), and the Grade I Listed St Andrew's Church.
171. The site is bound by PRoW along its west, east and south sides with occasional filtered views looking out to the Dunwich coastline.
172. Vegetation loss is anticipated, where the scheme crosses Stocks Lane. As the route progresses further west, it is proposed to use trenchless cable installation, such as HDD, to avoid significant adverse effects on highly sensitive areas.

### *Converter Station Site at Saxmundham*

173. The proposed converter station site is located south-east of the town of Saxmundham.
174. The surroundings of the proposed site are typically agricultural with open views across the landscape.
175. Saxmundham Conservation Area includes numerous Grade II Listed Buildings and the Grade II Listed Church St John Baptist. The Grade II Listed Hurts Hall lies to the south of the town and Conservation Area and overlooks the Fromus Valley. The area's landscape character falls within the Ancient Estate Claylands landscape type (Suffolk Landscape Character Assessment). Moving out from Saxmundham, Hill Farmhouse, Grade II listed, is one of the closest Listed Buildings, which would potentially experience a negative impact to their setting (this should be assessed with the Historic Environment Assessment).
176. In terms of PRoW footpaths Saxmundham 23 & Sternfield 6, are situated very close to the proposed converter station and construction compound location. PRoW Sternfield 6 would require diversion and would need to cross the proposed permanent access road connecting the converter station site to the B1121. THE COUNCIL does not support the proposed permanent crossing and access road through the Fromus Valley, as the adverse effects are considered too great within this sensitive landscape.

### *Cable corridor*

177. The exact alignment of the cable route is yet to be finalised, both for the HVDC and HVAC cables. The corridor crosses an extensive area, including farmland, hedgerows, roads, watercourses and PRoW. Efforts have been made to

mitigate the and reduce the extent of loss and disruption to existing landscape features, including trenchless installation of cables in sensitive locations.

### *Friston Substation*

178. It is anticipated that the HVAC cables will connect to Kiln Lane Substation at Friston and that this substation will be completed and operational by that time. The effects are considered in the Amendments to Kiln Lane Substation Scenario. However, a Full build Out of Kiln Lane Substation Scenario is also being considered.
179. The Applicant has identified LLCA 02 in the northern part of LCA K3, as being within the setting of the National Landscape For this LLCA, significant effects are predicted during construction (in either scenario) and for the year one (for Full Build Out), reducing to non-significant by year 15 (in the Full Build Out scenario).
180. It is further predicted that the physical impacts on the landscape pattern and disturbance to character and tranquillity would be perceptible in the adjacent areas of the National Landscape. THE COUNCIL notes in this context that the s.85(A1) duty of CROW Act 2000 also applies to impacts on the National Landscape from development outside it and that there will be a need for effective measures to address it.
181. It will be essential to coordinate the LionLink project and its cable route with the other, preceding, projects in this location, in particular with regards to the landscape-scale mitigative planting that is required in this area.

### **Landscape Strategy and Design Principles**

#### *The Converter Station - Background to Potential Design Approaches, January 2026*

182. *The Converter Station - Background to Potential Design Approaches* document presents the wider aims for the scheme as well as more detailed design options, centred around the converter station site. The Council welcomes the Wider Onshore Approach (Section 3.1), in particular the reinstatement strategy, the approach to place making around the converter station site, and the Applicant's engagement with the legal duties in relation to the National Landscape.
183. further welcomes the landscape design approach as presented in Section 4.3 culminating in the illustrative co-location landscape masterplan and considers that this should be taken forward to submission and developed into detailed landscape proposals.
184. While the greatest opportunity for landscape-led place making would be around the converter station (where most of the mitigation is shown within the available documents), opportunities within the cable corridor should also be maximised and reflect Suffolk's *Local Nature Recovery Strategy and Saxmundham Town Council's "Empowering Nature"*.
185. With regards to the Architectural design approach options (Section 4.12), The Council offers the following comments.

#### Agricultural Approach

186. The Council considers that because of the scale of the converter station, the simplicity of shape and materials of modern agricultural/ industrial buildings,

could seem visually uninspiring and disproportionate in scale, even with feature gables and enhanced cladding.

### Enhanced Facade

187. While visually striking in its appearance, the Council considers that the illustrated Enhanced Facade on a cuboid building mass would be too urban for the rural context the converter station is located in. The Council also has reservations as to whether the proposed metal rainscreen layer would be able to link the new buildings to the local vernacular and be reminiscent of flint buildings.

### Curved Roof

188. The curved roof design appears to be combining some positive elements of modern, agricultural buildings with a more contemporary design, which responds to the gently undulating surroundings and softens the appearance of the structures, as shown in the East Elevation. In the North Elevation, the difference to the agricultural approach becomes less pronounced.

189. The Council considers that, combined with sensitively chosen materials and finishes, this design approach may be able to deliver modern infrastructure with a sympathetic and location-appropriate appearance. The Council therefore considers that this approach should be further explored.

### Fragmented Forms

190. The Council considers that the Fragmented Forms approach is related to the Agricultural approach.

191. While the concept of fragmented forms is alluring, the Council is concerned that the final designs for the fragmented forms and material choices would result in a design that sits less well in the landscape and might even be jarring.

192. Overall, the Council considers that the Curved Roof approach promises to be the most sympathetic, yet unapologetic approach. Elements of the other approaches, such as facade treatments and detailing could be incorporated, especially on elevations, where the curvature of the roof is not visible.

193. *Design Principles, January 2026*

THE COUNCIL welcomes the Proposed Scheme Design Vision (Design Principles, page 3):

194. *“The Proposed Scheme will be sensitive to place and will contribute positively to nature recovery at the landscape scale and the communities it touches. It will create opportunities to deliver Environmental Net Gain and social value by maximising the benefits locally.”*

195. The Council welcomes, how the Applicant proposes to achieve this vision, including but not limited to an environment-led approach, which looks beyond the immediate context of the proposed scheme to identify wider opportunities at landscape-scale (Design principles, page 3).

196. The Council further welcomes the Proposed Scheme Wide Design Principles (Design Principles, Table 2) and Site-specific Proposed Scheme-level Design Principles and considers that these should be secured in the DCO.

acknowledges the measures taken to coordinate this proposal with other projects that would influence one another in terms of inter-cumulative effects, namely East Anglia ONE North, East Anglia TWO, Sea Link, and Sizewell C.

197. The Council appreciates the consistency throughout the design documents as it relates to the overarching national policy statement for energy (EN-1). The principles align well with the *Criteria for Good Design for Energy Infrastructure*, section 4.7. Key points highlighted here are sustainable infrastructure sensitive to place, including impacts on heritage, efficient use of natural resources and land use. However, it would be required that those documents be referencing the most up to date version of the EN-1 statement, as both the *Design Principles document* and the *Converter Station – Background to Potential Design Approaches, Jan 2026*, currently reference the 2023 version which is now withdrawn. (It is acknowledged that at the time of writing these were the current versions). An updated 2025 version is now available and should be referenced going forward.
198. The Council further welcomes a design champion being identified to ensure the core design principles are carried through the planning and delivery process, ensuring maximum value is provided by the scheme.

### **Onshore General Arrangement Plan drawings**

199. Having reviewed the *Onshore General Arrangement Plan Series*, the Council welcomes the proposals for trenchless cable installation, such as HDD, including for landscape features such as mature trees and hedgerows. The proximity of noise sensitive receptors would be a consideration however.
200. An Arboricultural Impact Assessment (AIA) plan would be useful for cross referencing the arrangements drawings, 01-06, against any vegetation that is set to be removed for construction of permanent and temporary structures. The extent of vegetation removal to enable accesses and haul road construction will need to be fully assessed and documented.
201. As a principle, the loss of mature trees to temporary compounds, accesses and visibility splays is discouraged and should be avoided, as far as is possible.
202. Where accesses are temporary, vegetation within visibility splays should be coppiced rather than removed.
203. Traffic management measures will need to be applied to minimise the required vegetation removal for visibility splays. These measures need to be anchored into the relevant control documents, including the Construction Traffic Management Plan (CTMP).
204. Appropriate tree protection fencing will need to be provided for retained vegetation and agreed with the relevant planning authority.
205. Further details will be required for the ES regarding the methods of cable installation where the Offshore High Voltage Direct Current (HVDC) cable alignment (dashed lime green line) meets the land and how it will seek to be sympathetic to the highly sensitive habitat and landscape character in this area.

### **Landscape and Visual Assessment**

#### *Methodology*

206. The Council considers the Landscape and Visual Impact Assessment Methodology to be broadly acceptable and appropriate in the level of detail.

207. With regards to significance of effects, the Council notes that a professional judgement and narrative will be particularly important for effects that could be moderate or minor, which would determine whether they would be considered significant or not. The Council also notes that an accumulation of effect below the significance threshold can become significant in their accumulation. The Council further considers that while the mitigation of significant adverse effects must have priority, adverse effects below the significance threshold should not be ignored in mitigation proposals.
208. The Council notes that the Applicant is not proposing to carry out a Residential Visual Amenity Assessment (paragraph 13.5.21). It should be noted that, while a Residential Visual Amenity Assessment may not be required, there are other factors which may impact residential amenity, such as noise, vibration and air quality, which should be appropriately assessed.

#### *Visual Baseline and visualisations*

209. The visual baseline is largely considered comprehensive, covering the aspects around the landfall site in Walberswick and at the sites in Friston and Saxmundham.
210. However, in some areas, mainly along the cable corridor, the proposed viewpoints were considered insufficient in conveying the potential adverse effects. During a joint site visit of the Council and the Applicant, conducted on 16 January 2026, some additional viewpoints were identified along the corridor. It was agreed that these would be included in the ES.
211. The Council welcomes the layout of the Viewpoint Assessment pages. It is noted that the baseline viewpoint photographs were not complete at publication of the PEIR. It is also noted that none were annotated. The Council requests that the viewpoint assessment photographs are annotated, where Type 1 visualisations are presented, identifying landmarks, the extents of the scheme and indicate the intervisibility between viewpoint and elements of the scheme.
212. The Council expects that in the ES the Applicant will set out a clear rationale regarding the visualisation types proposed/used for each viewpoint.

#### *Arboricultural and Hedgerow surveys*

213. The PEIR states that Arboricultural Impact Assessments and Hedgerow Surveys will be provided in the ES.
214. Please find some guidance on hedgerow surveys and trees in Appendix 1.

#### *Mitigation*

215. Mitigation is defined as follows (Chapter 5 EIA Approach and Methodology, paragraph 5.5.57):
216. *'In line with IEMA (now ISEP) guidance (Ref 16), and professional best practice, consideration is given to three key types of mitigation:*
- a. Embedded mitigation, also known as primary or inherent mitigation.*
  - b. Additional mitigation, also known as secondary or foreseeable mitigation.*
  - c. Good practice mitigation, also known as control measures, tertiary or inexorable mitigation'*
217. In Chapter 13 Landscape and Visual Amenity states in paragraph 13.9.2:

218. *'For landscape and visual amenity, all mitigation relating to construction phase effects is considered to be tertiary and for operational phase effects is considered primary (embedded). Section 13.7 of this chapter explains this further and summarises key changes to the design of the Proposed Scheme, which have been informed by the LVIA as part of the iterative design process. This approach is explained further in Appendix 13.1 LVIA Methodology. Therefore, no secondary measures are currently proposed.'*
219. Paragraph 13.7.6 refers to a range of primary measures without further referencing them.
220. Paragraph 13.7.8 refers to the Masterplan, placing the multi-functional environmental mitigation and enhancement measures within the framework of the landscape design.
221. The Council would welcome clarification on the following points:
- a. Is the Masterplan (which combines mitigation and enhancement) part of the primary/ embedded mitigation?
  - b. Into which category of mitigation does the Applicant consider replacement planting within the cable corridor to fall?
  - c. Has any enhancement, for example improvement to green corridor connectivity or measures aligned with the Suffolk LNRS, been considered for the cable corridor? And if not, why not?
  - d. Why is it considered that secondary/foreseeable mitigation is not required? The Council considers that this should be reviewed for the ES and then again at detailed design stage.
222. The Council welcomes the Environmental Masterplan at the Saxmundham site. However, the Council considers that strategic landscape proposals which include on- and off-site mitigation planting could also be required.
223. For any mitigation planting proposals, it will be essential to apply realistic expectations to annual growth rates.
224. The aftercare and maintenance periods will need to be adaptive and will vary with the type of planting.

#### **Intra- and Inter-cumulative effects (PEIR Chapter 28 Cumulative effects)**

225. Any assessment of intra- and inter-cumulative landscape and visual effects must consider that the receptors can move through the landscape (PRoW), that therefore sequential effects need to be assessed and that a series of non-significant effects can become significant in accumulation. The effects on the receptors are also not restricted to visual effects. Even, when the infrastructure is not seen, the knowledge that the infrastructure is there (for example, behind screen planting) is likely to affect how the landscape is perceived and valued. Other factors of influence could include noise, vibration and dust.

#### *Intra- cumulative effects*

226. The intra-project effects assessment will be undertaken and reported in the ES (para.28.4.1) and the Council will provide comments then.
227. The Council queries, however, why the Applicant considers in *Table 28.3: Potential for intra-project effects onshore* that effects on Air Quality, the Historic

Environment, Noise and Vibration and Traffic and Transport could not have the potential to interact with effects on Landscape and Visual amenity.

228. *Intra-project effects of the Proposed Onshore Scheme and the Proposed Offshore Scheme*

229. Table 28.5: Potential for intra-project effects of the Proposed Onshore Scheme and the Proposed Offshore Scheme (Typo: Landfill should read Landfall)

230. The Council queries if this includes all potential receptors.

*Inter-cumulative effects*

231. The long and short list of other projects with the potential for inter-cumulative effects shows that there is some considerable potential for these types of effects. These will have to be examined in greater detail when further information of this and other proposals will be available. The Council will provide more detailed comments then.

**Control Documents**

*Outline Code of Construction Practice (PEIR Appendix 2.1)*

Working hours (CoCP, Section 5.1)

232. The Council has concerns with regards to the proposed working hours, in particular in the vicinity of residential properties, and considers that further justification is required for the need of the proposed standard working hours as well as for the long list of exceptions, which would allow even longer working hours.

233. The working hours in the vicinity of residential receptors and the resulting impacts will need to be further clarified and assessed, and it will need to be considered whether, in relation to associated noise, contingencies may be required to provide alternative accommodation for residents of the most affected receptors.

234. Community relations and stakeholder engagement (CoCP, Section 4)

235. The Council welcomes the proposed channels of communications and the proposed development of a community engagement plan. However, the proposals for community engagement and public information appear one-directional rather than providing active engagement with the communities, such as meetings or engagement with regards to community-led mitigation and landscape master planning, compensation and wider community benefits.

Lighting

236. The Council welcomes the measures to minimise light pollution and adverse effects of lighting on wildlife and visual receptors during construction (CoCP, Section 5.5).

237. For the operational external lighting at the converter station and substation sites, the Council considers that lighting designs will need to be agreed with the relevant discharging authority.

238. Vegetation Clearance

239. The removal of trees, tree groups and hedges should be minimised and avoided for temporary structures such as compounds and accesses.

240. It is noted that in PEIR Chapter 2, Description of the Proposed Scheme, vegetation clearance is listed as part of the enabling works prior to commencement. The Council considers this only acceptable if, prior to this, the detailed design is finalised, and frozen and up-to-date detailed plans detailing vegetation removal and retention have been agreed with the relevant discharging authority. This is to avoid unnecessary vegetation loss.
241. The Council expects the Applicant to keep vegetation loss for temporary measures, such as temporary access and work compounds to an absolute minimum and considers that loss of mature trees should be avoided altogether. Traffic management schemes should always be considered to minimise vegetation losses. Hedgerows within temporary access visibility splays should be coppiced rather than removed as a principle.

#### Outline Landscape and Ecology Management Plan (LEMP)

242. An outline LEMP is to be provided for the ES. The Council welcomes the Applicant's two stage approach, proposing an Outline LEMP for the consent stage, with a detailed LEMP being produced and discharged as a requirement post consent. The Council suggests that, should the project be divided into stages, this detailed LEMP could consist of an overarching LEMP and stage specific LEMPs.
243. The Council considers that a five-year aftercare plan will not be sufficient for all types of planting. While this may be sufficient for hedgerow reinstatement, it will not be sufficient for trees, tree groups and woodland planting.
244. Other Control Documents are due to be provided in the ES, such as OCEMP and a Draft DCO and the Council will comment on these in due course.

#### **Appendix 1 Guidance on Hedgerows and Trees**

##### *245. Hedgerows and Important Hedgerows*

246. It should be anchored in the ES and in the definitions of the DCO that "hedgerow" and "important hedgerow" have the meaning given in the Hedgerow Regulations 1997. Any important hedgerows that are to be removed should be listed in a Schedule of the DCO (Removal of Important Hedgerows) and identified on an appropriate plan.
247. No work should be allowed to commence until full and complete hedgerow surveys have been carried out. This is necessary to inform the baseline against which Biodiversity Net Gain and the success of the LEMP would be assessed and to agree replacements as part of the landscaping scheme.
248. The Council considers that important hedgerows for the purposes of this scheme should include:
249. Those meeting the Hedgerow Regulations, including the criteria for Archaeology, History, Wildlife and Landscape as listed in Schedule 1 of the Regulations.
250. If bat surveys identify 20 or more passes by bats the hedgerow should be considered important as a bat corridor.
251. All the hedgerows where one or more passes of a barbastelle have been recorded - due to the rarity of the species and margin for error in recording.
252. Those that perform an important visual function.

253. Any required hedgerow removal will need to be compliant with the Wildlife and Countryside Act 1981 which restricts the timings of this in relation to nesting birds. Also, as hedges are an invaluable habitat resource the removal of hedges, if required, must have a degree of control, suitable assessment and adequate mitigation, including that hedges can only be removed in accordance with any approved plans.
254. To enable full understanding and assessment of locations of important hedges, and areas, where either Horizontal Directional Drilling (HDD) needs to be undertaken, or offsetting of residual impacts needs to be agreed the Council would ask the applicant to:
255. Append a column which identifies, by reference to the hedgerow regulations, why hedgerows are considered important.
256. Display the above hedges on a colour – coded map of an appropriate scale, distinguishing between the different criteria and include the additional hedgerows covered by points 2 (bat passes) and 3 (visual importance) above.
257. Confirm that the hedgerows in the cable corridor have been assessed against all the criteria in the hedgerow regulations, regarding, for example the presence of other protected species (Part II 6 (3)) and proximity to rights of way (Part II 8).
258. Provide photos of each of the hedgerows which fall within the definition of 1, 2 and 3 above as and in accordance with point C. This will provide a reference for the baseline.
259. Confirm which hedgerows the applicant is proposing to HDD.
260. Confirm how adverse impacts on hedgerows are minimised, for example by defining a minimum width for the cable corridor, when crossing hedges or coppicing, rather than removing hedgerows from temporary visibility splays. This should be individual for each hedgerow (as circumstances may differ).

### *Trees*

261. The Arboricultural Impact Assessment, which should be included in the ES, should provide full Tree Surveys in accordance with BS 5837:2012 Trees in relation to design, demolition and construction. These Tree Surveys should then be used to inform the detailed design stage and micro-siting of all works and required tree protection measures, such as protective fencing.
262. Ancient and veteran trees and ancient woodlands are considered irreplaceable habitats and landscape features and any impacts on these should be avoided.
263. Post Consent, no works should be allowed to commence until a full Arboricultural Impact Assessment (including Tree Survey and Tree Protection Plan) and an Arboricultural Method Statement, (including location specific special construction method statements, where works are to be carried out within rootzones of trees that are to be retained) in accordance with BS 5837:2012 are submitted to and agreed with the relevant LPAs in writing.
264. No article in the DCO should automatically authorise any works to any tree subject to a tree preservation order. Such works, if demonstrated to be unavoidable, should be agreed with the relevant LPA on a case-to-case basis so that appropriate compensation can be agreed and secured.

## Planning

265. The Council is the Minerals and Waste Planning Authority in Suffolk. The proposed development does not directly impact existing or proposed minerals and waste development. In terms of minerals safeguarding, the sand and gravel resources within Suffolk are of at most regional importance as opposed to these proposals which are of national significance. However, there are significant gravel rich deposits known as the Westleton Beds and an assessment of the interactions with the proposed development should be undertaken so that unnecessary sterilisation can be avoided.

## Public Health

### PEIR Volume 1 Chapter 10 Health and Wellbeing

266. Public Health welcomes the structured approach to policy and methodology and the use of the IEMA guidance as set out in paragraph 10.4.34.

267. We also welcome the inclusion of The Council's Community Engagement and Wellbeing guidance in Table 10.2, however note the local policy list does not reference East Suffolk Council's Healthier Environments Supplementary Planning Document<sup>i</sup>. Given the chapters reliance on local policy to frame determinants, this SPD should be added to Table 10.2 and used to steer subsequent EIA iterations, mitigation design and engagement practice.

268. On scope, paragraphs 10.4.10 and 10.4.11 define "*Environmental amenity*" in terms of traffic, noise and vibration, air quality and the visual environment, and recognise the links to mental wellbeing, satisfaction with the local environment and sense of place. Public Health agrees with this framing. However, because "*Access to community services*" is treated separately in 10.4.14, there is a risk that access effects are given less weight in the cause and effect chain from project activities through to health outcomes. To avoid this, we recommend that aspects of 10.4.10–10.4.11 are amended as the EIA develops, as to signpost access as a core consideration alongside amenity, referencing access to social infrastructure (including healthcare, education, green and blue space and the PRoW network) and that these paragraphs crossrefer to 10.4.14 so it is clear that amenity and access will be considered together wherever relevant in the assessment.

269. Regarding baseline methods, Public Health notes paragraph 10.4.26 confirms a deskbased baseline only for Health and Wellbeing. Given the scheme interacts with small, dispersed rural communities and seasonal visitor populations, we consider the deskbased approach alone may not be sufficient. We therefore recommend targeted, proportionate primary data collection to supplement the desk review before ES.

270. Public Health supports the inclusion of local health inequalities and mental health indicators. We note paragraph 10.6.18 identifies that the population near Kiln Lane Substation "*is within the third decile, indicating higher rates of mental illhealth than average for England.*" Paragraphs 10.6.41 and 10.6.42 identify an ageing population near the Landfall site and that "*19% of the population within the study area are categorised as disabled under the Equality Act*". We consider these indicators materially relevant to sensitivity judgements and to the design of mitigations, enhancements and engagement.

271. In Table 10.10, the study area population sensitivity is recorded as to “*Low to medium*”, including at the Landfall site where “*Residents in this study area have limited access to community facilities locally.*” Public Health queries whether this sensitivity is sufficiently precautionary, given the combination of an older age profile, a relatively high proportion of disabled residents, and constrained access (one principal road) described in the chapter. We recommend the ES revisits the sensitivity classification for Walberswick and any similarly constrained clusters, with a clear rationale that takes account of age, disability, digital exclusion, transport reliance, and the ability to absorb and adapt to prolonged amenity change.
272. Public Health do not believe that vulnerable groups are comprehensively detailed. Paragraph 10.6.48 outlines vulnerability categories of children and adolescents, older people, low income and unemployed groups and people with health challenges or disabilities. Whilst mental health is touched on in relation to noise impacts, given the SAMHI findings and the known sensitivity of people living with anxiety, depression and other mental health conditions, Public Health recommends the ES specifically includes “people with mental illhealth” as a vulnerable group and evaluates differential effects for this group wherever significant amenity/access change is predicted. Given the density of overlapping NSIPs and the ES commitment to report cumulative effects (paragraphs 10.4.32 and 10.4.33), Public Health request specific consideration is given to cumulative Mental Health and Community Resilience at ES including a distributional analysis using SAMHI/IMD and a Community Health and Resilience Plan that incorporates monitoring and escalation.
273. On environmental amenity and sense of place, Public Health notes the chapter’s clear finding in paragraph 10.8.7 that increased construction traffic “*is likely to result in a reduction in the perceived quality of the environment.*” We consider this statement important and recommend that the ES links it to potential mental health impacts, recognising that reductions in tranquillity, control and predictability can exacerbate anxiety and reduce wellbeing, especially in communities with strong place attachment.
274. At a scheme wide level, paragraph 10.8.9 concludes that effects on environmental amenity are “*a minor, adverse and temporary (not significant) health and wellbeing effect on the general population of the study area.*” Public Health cautions against broad brush averaging that risks masking impacts in high sensitivity clusters identified in 10.6. We request that the ES presents a distributional analysis of amenity effects by LSOA (or finer where appropriate), specifically observing pockets of higher sensitivity (e.g. older/disabled/lower income groups, or those with constrained access to social infrastructure) and state where targeted mitigation will be applied. This should include a receptor specific intra-project assessment in order that combined effects on more sensitive communities are neither masked nor left without mitigation.
275. On active living and PRow, paragraph 10.8.11 explains that, despite diversions on PRow exceeding eight weeks and “*Significant visual effects are also identified along certain PRows*”, “*overall participation in recreational walking will not be affected.*” Public Health is not persuaded this is robust without stronger seasonal and receptor specific evidence. Local PRow use can be highly seasonal and sensitive to changes in tranquillity, detours, and works intensity, particularly for older residents and people with mobility or mental

health conditions. We therefore recommend the ES supports this conclusion with seasonal user data and sensitivity mapping of key links (e.g. promoted routes, school and healthcare access links, mobility friendly paths). It may also be necessary to expand the study area to include key routes to social infrastructure including healthcare and education.

276. On access to services, paragraphs 10.8.34–10.8.37 acknowledge that temporary closures and diversions will increase journey times and that “*there is only one main road in and out of Walberswick*” concluding a “*moderate, adverse and temporary (significant) health effect*” for the general population and for vulnerable groups. Public Health agrees this is a significant issue for wellbeing. We recommend liaison arrangements with local primary care, community nursing and social care teams so that care visits, urgent appointments and medicines deliveries are maintained, with a monitored access plan and escalation framework where delays emerge.
277. Public Health supports the discussion at the Landfall site about the implications of extended working and the potential for reduced respite. Paragraph 10.8.25 confirms that “*Following mitigation, no significant adverse effects are identified from air quality for residents of Walberswick,*” but paragraph 10.8.26 – 10.8.27 identifies a “*significant noise*” for nearby residents and explains that exceptions to working hours include “*continuous periods of construction*”, resulting in a lack of “*predictable respite from construction noise during daytime hours,*” which “*is likely to lead to adverse effects on mental wellbeing and quality of life.*” In addition, 10.8.28 notes that nighttime lighting during 24hour construction can “*result in a diminished perception of the tranquillity of the village, resulting in perceived degradation of the local environment*”. Public Health considers these findings material to mitigation design and expects specific commitments to deliver meaningful respite, predictable quiet windows, and a community agreed approach to nighttime controls at the Landfall site. Furthermore, as detailed above, we recommend the ES upgrades the Landfall community sensitivity of “*Low to medium*” (Table 10.10) in light of the older age profile (10.6.41), the higher proportion of disabled residents (10.6.42), and the singleroad access constraint acknowledged at 10.8.35–10.8.36 and reflected in the significant access finding at 10.8.36 – 10.8.37.
278. Public Health notes paragraph 10.7.2, which states that “*no specific additional mitigation measures for Health and Wellbeing are expected or proposed beyond those identified within... the Outline Onshore Code of Construction Practice.*” In light of the significant effects confirmed at the Landfall on environmental amenity and access, and the chapter’s own conclusion at 10.10.3 that significant residual effects remain at the Landfall site, we consider it necessary for the ES to introduce additional, sitespecific health protection and community wellbeing measures, not merely best practice or generic controls. Mitigations should include advance and real time construction information tailored for older and digitally excluded residents, a named community liaison team with 24/7 phone line for welfare issues and an access plan for urgent healthcare, care visits and medicines deliveries, agreed with local providers.
279. In Table 10.6 the chapter lists Data sources used to inform the Health and Wellbeing assessment including national sources (ONS 2021 Census, IMD 2019, OHID Local Health Profile). Public Health recommends supplementing these with Suffolk specific sources before ES, for example, Healthy Suffolk

JSNA that is cited elsewhere in the Chapter, plus the Pharmaceutical Needs Assessment for Suffolk<sup>ii</sup> and Suffolk Green/Blue Space profile<sup>iii</sup>, to strengthen the local evidence base on access, exposures and service capacity. We also recommend that “Suffolk in 20 years”<sup>iv</sup> forecasting materials (demography, frailty, comorbidity) are used to frame resilience and adaptation during the construction window. Paragraph 10.4.26 presently commits to “desk based” baseline, we suggest the above additions, combined with proportionate primary data collection, will better reflect local conditions, notwithstanding, as above, we consider the deskbased approach alone may not be sufficient

## **PEIR Volume 1 Chapter 16 Socio-Economics, recreation and tourism**

### *Local Employment, Skills and Health Benefits*

280. Public Health notes the Applicants preliminary assessment of construction and maintenance workforce requirements (paragraphs 16.5.6, 16.6.11, 16.8.3 and 16.8.5), including acknowledgement that a proportion of the workforce is likely to be sourced from outside the local area due to the specialist nature of some activities.
281. From a public health and socio-economic perspective, we emphasise the importance of maximising local employment opportunities. Employment is a well-established wider determinant of health, contributing positively to income security, mental wellbeing, skills development and long term economic resilience. Conversely, reliance on a predominantly non-local workforce can dilute these benefits and may exacerbate pressures on local accommodation, services and community cohesion.
282. Whilst Public Health recognises that specialist roles may need to be filled from outside the local labour market, we consider that the Applicant should demonstrate that all reasonable effort will be made to recruit locally for all suitable roles during both construction and operation. This should include clear consideration of how local labour, apprenticeships, traineeships and supply chains will be prioritised, and how barriers to local participation will be addressed.
283. In this regard, we note that the PEIR does not currently commit the Applicant to preparing and implementing a project specific Local Employment and Skills Plan. To ensure the positive economic and health impacts of the Proposed Onshore Scheme, Public Health considers that such a plan should be developed and implemented in collaboration with The Council and other relevant local partners.

### *Impacts on Local Businesses, Recreation, Tourism and Community Wellbeing*

284. Public Health welcome the identification of promoted recreational routes, community facilities and open space, visitor/tourism facilities and other local businesses within the study area as set out in Table 16.21 to 16.24 inclusive. We note the Applicants conclusion that effects during construction are generally anticipated to be minor adverse and not significant, with impacts including those due to increased construction traffic. From a public health perspective, the assessment does not fully capture the potential socio economic and wellbeing impacts on affected receptors. In particular, the assessment places limited emphasis on indirect and cumulative effects on mental health and wellbeing experienced by business owners, employees, service users and visitors. For many small businesses, visitor accommodation providers,

recreational facilities and community assets identified in the Chapter, even short-term disruption can give rise to anxiety, stress and uncertainty. There may be fears around potential loss of income or reduced visitor numbers, perceived changes to the attractiveness or tranquillity of the local area, concerns about increased traffic, road safety and personal security and the cumulative burden of prolonged construction activity alongside other local developments. These factors are particularly relevant for receptors with seasonal or time sensitive operations (such as tourism accommodation, festivals, farm shops and recreational routes), and for community and wellbeing focused businesses where the quality of the surrounding environment is integral to their function.

285. As the environmental assessments progress to full EIA stage, Public Health recommend the Applicant expand the socio-economic, recreation and tourism assessments to consider potential mental health and wellbeing effects linked to disruption, uncertainty and perceived risk, and how these may interact cumulatively across the construction programme. This should include proportionate mitigation measures aimed at reducing anxiety and disruption for affected businesses and community assets, such as proactive engagement, timely communication of construction activities, and tailored support for sensitive or seasonal receptors and demonstrate how ongoing engagement and monitoring will be used to identify and respond to emerging issues affecting local businesses, recreation and tourism during construction.

## **PEIR Volume 1 Chapter 15 Noise and Vibration**

### *Landfall site*

286. Public Health are particularly concerned about the predicted significant adverse effects associated with construction activities at the Landfall Site, where continuous Horizontal Directional Drilling (HDD) is required. The Applicant acknowledges in Paragraph 15.8.51 that *“Night-time construction works at the proposed Landfall Site are likely to be required as the HDD drill rigs need to be in constant operation until the cable duct drilling operations are completed”*. The assessment identifies that Category A thresholds will be exceeded at multiple residential receptors (paragraph 15.8.52), with Paragraph 15.8.54 noting that *“exceedances of up to 14dB are predicted with a 5m barrier”* and that these exceedances *“may occur for a period of ten or more days in any 15 consecutive days and is therefore assessed as a significant effect.”*. Furthermore, Paragraph 15.8.55 confirms that *“the SOAEL is predicted to be exceeded at receptors ALID\_75 and ALID\_76”*.
287. From a public health perspective, these predicted exceedances represent a material risk to the health and wellbeing of the affected community. Noise and vibration from construction activities can have direct impacts on physical<sup>vi</sup> and mental<sup>vii</sup> wellbeing, all of which can compound other pressures already present within communities experiencing multiple concurrent infrastructure schemes. Vulnerable groups, including older adults, infants, people with longterm conditions, and those experiencing stress from other developments, are likely to be disproportionately affected. These impacts are particularly concerning in locations such as Walberswick, where tranquil nighttime environments mean that intrusive noise is more perceptible and more disruptive to wellbeing.

288. Similarly, we do not consider the conclusion of Paragraph 15.8.50 to fairly represent the effects noted to receptors ALID\_75 and 76 as summarised in Paragraph 15.8.46.
289. Public Health notes that paragraph 15.9.2 refers to the need for a Noise and Vibration Management Plan (NVMP), which “*shall be developed prior to the start of construction works on site*” and may include “*other offsite mitigation measures as presented in BS5228.*” Whilst potentially this may include offsite and community focused mitigation approaches, these are yet proposed or evaluated within the PEIR. At present therefore, the assessment leaves a clear residual significant effect with no committed mitigation beyond general best practicable means. This is not sufficient to safeguard public health where predicted nighttime noise is considered likely to exceed SOAEL for extended durations.
290. As the environmental assessments progress to the full EIA stage, Public Health expects the Applicant to provide a much more robust and detailed mitigation strategy for managing significant effects at the Landfall Site. This should include a transparent and systematic appraisal of all feasible mitigation options to avoid or reduce exposure, in line with the principles of the mitigation hierarchy and relevant guidance. If temporary relocation is proposed as a potential mitigation measure, this must not be presented as a default or solely technical solution but should be subject to careful consideration of the characteristics and needs of the affected population. Walberswick comprises a mixed but notably sensitive community including older people and individuals with disabilities. Displacement from familiar environments, even on a temporary basis, can give rise to additional adverse impacts on mental wellbeing, anxiety, social isolation and continuity of care. Public Health therefore expects any consideration of temporary re-housing to be accompanied by a clear assessment of potential secondary health impacts, the suitability and accessibility of alternative accommodation, the duration and timing of relocation, and the cumulative effects on community cohesion and wellbeing. Where relocation is considered, the Applicant should demonstrate how impacts will be minimised, how residents will be supported, and how individual needs will be identified and addressed through early engagement and tailored mitigation.

#### *Full Build Out of Kiln Lane Substation Scenario*

291. Public Health notes the predicted noise effects at receptor ALID\_7, representing residential properties near Manor Farm, as set out in paragraph 15.8.12. Whilst the Applicant concludes that the exceedance of Category A (LOAEL) by approximately 2dB, arising primarily from haul road activity, is not expected to trigger the temporal criterion for significance under BS 5228, Public Health considers that this effect may still give rise to adverse effects on health and wellbeing. Such effects may include sleep disturbance (depending on timing of movements), stress and reduced quality of life and restricted access, particularly for residents exposed to other concurrent construction impacts or cumulative infrastructure activity. Public Health is concerned that the assessment appears to rely heavily on the application of temporal criteria, without sufficient consideration of cumulative exposure, community perception, or the lived experience of residents over multiple years of construction.

292. Public Health therefore expects that, as the assessments progress to the full EIA stage, the Applicant will identify and commit to proportionate mitigation measures for receptors such as ALID\_7. This should include measures to minimise haul road noise at source, such as traffic management and routing controls, limits on daily HGV movements, timing restrictions to avoid sensitive periods, vehicle standards, and physical mitigation where feasible. The Applicant should also set out how affected communities will be informed, engaged and supported, including through advance notice of high-intensity periods and accessible complaint and response mechanisms.

### **PEIR Volume 1 Appendix 2.3 Electromagnetic Field Assessment**

293. Public Health does not have a technical role in validating EMF modelling, compliance or exposure assessments. Our comments are provided from a population health and wellbeing perspective.

294. Public Health welcomes the confirmations set out in Paragraphs 5.1.7 to 5.1.12 of page 27 (noting we believe the intended references were 7.1.7 to 7.1.12).

295. We note however, that the Applicant's assessment in Paragraph 5.1.8 refers specifically to maximum normal loading conditions. Public Health requests clarification that, under abnormal operating or fault conditions, magnetic fields for the onshore cables and the converter/substation assets would remain within safe exposure limits (and within relevant ICNIRP thresholds) as not to pose a risk to public health, particularly for nearby sensitive receptors, and how this will be evidenced at ES.

296. As the environmental assessments progress to full EIA stage, Public Health recommend the Applicant clarify whether the project will be compliant to both ICNIRP Guidelines of 1998 and 2020.

297. Public Health note that public concern and anxiety relating to perceived radiation risks can itself give rise to adverse mental wellbeing effects, particularly where understanding of EMF is limited or misinformation circulates locally. Whilst these effects are not attributable to EMF exposure per se, they may still constitute a relevant psychosocial health pathway. It is therefore recommended that the ES clearly distinguishes between evidence based physical health risks and perceived risks. The Applicant's community engagement materials should include clear, plain English information on EMF, ICNIRP standards, and how compliance will be ensured. Additionally, mechanisms should be identified for responding to community questions or concerns regarding EMF throughout construction and operation.

### **PEIR Volume 1 Chapter 2 Description of the Proposed Scheme**

#### *Working hours, nighttime activity and respite*

298. Public Health recognises construction practicalities but must express our concerns about the breadth of proposed construction hours in Chapter 2 and the allowance for extended 24 hour operations. Paragraph 2.5.11 proposes "Monday – Friday 07:00–19:00; Saturday, Sundays and Bank Holidays: 07:00–17:00", whilst 2.5.15 lists exceptions including "continuous periods of operation such as... drilling during the operation of a trenchless technique (e.g. HDD)". Paragraph 2.5.74 further explains that 24 hour HDD at the Landfall could be required for up to "10 consecutive days per HDD," with potential for

longer periods “*in exceptional circumstances*”. In our view, these provisions risk extended periods without community respite, contrary to public health principles of minimising exposure and distress.

299. Public Health strongly recommend that core working hours are reduced to protect health, with Sunday and Bank Holiday working excluded, and that any startup/closedown periods avoid audible or intrusive activities. Specifically, we recommend core hours of 08:00–18:00 Monday–Friday and 08:00–13:00 Saturday, no Sunday/Bank Holiday working, startup and closedown limited to one hour each side, and be managed to avoid activities likely to cause disturbance to residents or businesses. This should be mirrored in the NVMP.

### **PEIR Volume 1 Chapter 28 Cumulative Effects**

300. Public Health requests that prior to ES submission, the Applicant provides a temporal overlap matrix (construction/operation), and that the ES delivers a receptor based cumulative assessment for noise and vibration, traffic, air quality visual/light access (social infrastructure including health care and education) for high sensitivity clusters. With respect to paragraph 28.4.4, Public Health recommend the intra-project matrix assessment should include health and wellbeing for transparency, even if analytical detail sits in Chapter 10.
301. With respect to the Zol, the current 300m is considered too limited for cumulative access and PRow/tourism effects. The ES should expand Health and Wellbeing Zol to encompass CTMP corridors, service catchments (Healthcare inc. primary and secondary care), and promoted PRow networks.

### **PEIR Volume 1 Chapter 7 Air Quality**

302. Chapter 7 considers air quality impacts from dust, construction traffic, Non-Road Mobile Machinery (NRMM) and generators.
303. In relation to construction dust, the report (Table 7.12) concludes that the air quality impacts are anticipated to be “*negligible and not significant with the appropriate mitigation and monitoring in place*”. Public Health consider the assessment to be comprehensive and support the mitigations highlighted, particularly the commitment for additional control measures for all sites where receptors are located within 100m of construction activities. We would however like a commitment from the applicant that complaints and air quality exceedances will be dealt with immediately to minimise any adverse impacts and protect the health and wellbeing of local communities particularly those more vulnerable to the effects of air pollution (which includes older people and those with respiratory conditions<sup>viii</sup> for which East Suffolk has a significantly higher percentage than the England average<sup>ix</sup>). As part of this commitment, we would expect to see transparent reporting and communication relating to dust levels along with any action taken to address them. We would like to see this form part of any communications and engagement plan.
304. In relation to construction traffic, this has not been quantified in the documentation and is therefore an unmeasured risk. We note that the applicant will undertake further modelling for the Environmental Statement (7.5.6). However, based on the information presented (in Chapters 7, 16 and 17) we expect construction traffic to adversely impact air quality and would therefore expect a systematic appraisal of all feasible mitigation options to avoid or reduce exposure, in line with the principles of the mitigation hierarchy and relevant guidance.

305. Data on Generator and NRMM emissions is also unavailable at this stage with the exact location of generators, plant specification and operating hours unknown (7.4.38). Again, this is an unmeasured risk but we note this information will be available for the development of the Environmental Statement (7.5.7). It is concluded in 7.8.13 that *“the effects due to generators and NRMM usage are likely to be negligible and not significant”*. This is a premature conclusion given the uncertainties, and we would welcome a comprehensive review in the Environmental Statement to ensure adequate mitigations are proposed to limit emissions and protect the health of local communities.
306. The applicant has made reference to the relevant national and local policy in preparing Chapter 7, listed in Table 7.2, and Public Health considers that all relevant policies have been referenced.
307. We would however welcome consideration being given to the World Health Organisation’s updated guidance<sup>x</sup> which recommends pollution levels up to four times lower than the statutory legal limits currently set in the UK, to protect public health. Whilst we acknowledge these guidelines are not statutory in the UK, they do highlight a shift in understanding around the levels at which air pollution can harm health and the growing body of available evidence<sup>xi</sup> to support this.
308. We would also like to draw the applicant’s attention to The Clean Air Strategy 2019<sup>xii</sup> which sets out Government plans for dealing with sources of air pollution: *“An aim is to shift the focus towards prevention, promoting greater action to avoid exceedances, rather than tackling air pollution only when limits are surpassed.”*
309. With both the World Health Organisation’s guidelines and the Clean Air Strategy 2019 in mind, we would like to see proactive action taken by the applicant to lower pollution levels from their current baseline through enhanced mitigation. We would like to see the applicant being more ambitious than simply complying with the statutory limits and instead taking concerted action to bring pollution levels down as low as possible for the health and wellbeing of local communities.
310. As part of this proactive action, we would encourage a commitment from the applicant for continuous air pollution monitoring in the vicinity of sensitive receptors, in particular schools and residential properties, throughout the construction phase.
311. Currently the Outline Onshore Code of Construction Practice (8.3.2) states: *‘If determined to be required as a result of the air quality assessment undertaken and reported in the ES, inspection and monitoring procedures will be identified and implemented to assess the effectiveness of measures to prevent dust and air pollutant emissions.’*
312. We would like the monitoring throughout the construction phase as standard as opposed to ‘if required’ to enable air quality concerns to be identified and rectified quickly to protect the health of local communities particularly those more at risk to the health impacts of air pollution.
313. We note that Chapter 28 - *Cumulative Effects*, includes a long list of neighbouring NSIP’s and other local developments with methodology proposed

for assessing the cumulative impacts including air quality, which Public Health supports.

314. In assessing the cumulative impacts, we would like to draw the Applicants attention to the Overarching National Policy Statement for Energy (NPS EN-1) Part 4.3 (Ref 2) which states:
315. *“The accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place”.*
316. It is vital when assessing the cumulative impacts, even using the proposed methodology, that the real-world effects on the health and well-being of local residents, is taken into consideration. It might be that the cumulative impacts study shows the impacts to be negligible and not significant but if the experience of local communities does not reflect this we expect a commitment for their concerns to be listened to and addressed as part of any programme of community engagement.

## **Public Rights of Way**

### **Summary of comments on Design principles January 2026 version 0.0**

317. 3.2 table 1, states that the “proposed design of the converter station includes substantial area of new habitat and permissive paths to substantially improve access to the countryside in proximity to the local community of Saxmundham and to join up fragmented parts of the PRoW network”.
318. 3.4 GE:22 in table 2 states “Minimise the effect of closures and diversions of Public Rights of Way (PRoW) and roads during construction and operation. Diverted PRoW should be replaced to an equivalent quality or better to the reasonable satisfaction of the relevant Highway Authority.” It should be noted that the Council PRoW require all routes to be left open as far as is practicably possible and preference given to PRoW users at manned crossovers. All routes should not be left in a lesser state than before any works and any diversion routes should be at least commensurate with the adjoining routes. All diversions and surfacing should be prior agreed with the Council PRoW in a reasonable timeframe.

### **Converter Station - Background to Potential Design Approaches January 2026 Version V0.0**

319. 4.3.7 states “The Converter Station site will provide a high-quality, accessible place that serves as a local destination with a strong sense of community identity. A network of public rights of way and strategic active travel routes will provide and attractive setting to encourage people to connect with nature and support healthy lifestyle choices.”

And

- e. “Provide recreational routes from Saxmundham and Sternfield with a range of distances, passing through a variety of landscape typologies connecting with existing recreational routes and links proposed by Sea Link.”

- f. "Create a new bridleway connection from the edge of Saxmundham to the existing bridleway and quiet lanes that lead towards the East Coast."
- g. "Improve wayfinding and public education through signage and interpretation boards, including local heritage, archaeology and storytelling."

"As per figure 48".

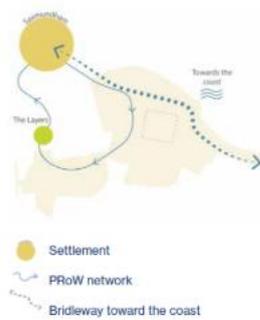


Fig 48 Provide strategic active travel routes, within an attractive setting.

- 320. This approach is encouraged and the provision of an off road, adopted route for bridleway users that links the existing PRoWs and green lanes as per the requirements in the Council NSIP guidance with reference to effect on PRoW users as mitigation for example, due to changes to user experience of the existing rights of way.
- 321. It is noted that no PRoWs are shown on the landscaping plan (figure 49), either existing or proposed. It is not clear from these plans if the existing PRoW will be relocated between the two converter stations of LionLink and Sea Link.
- 322. The above two documents appear to contradict each other with regards to PRoW. Any proposed links for sustainable, non-motorised users should be offered for adoption as a PRoW or highway to secure them for future generations for amenity and recreation.

**PEIR Non-Technical Summary LLK1-ARU-REP-ENV-000021 January 2026 Version 0.0**

- 323. 5.2.30 Agree during periods of construction, artificial lighting may diminish the tranquillity of the environment. Temporary diversions and realignments of public rights of way would occur and significant effects are anticipated with regard to environmental amenity.
- 324. 5.2.48 p. Visual baseline, including public rights of way, promoted long distance routes and public open space. Should include local promoted routes which can be found on the discover Suffolk website: <https://www.discoversuffolk.org.uk/explore-suffolk/>
- 325. 5.2.49 States "The effects include a reduction in existing tranquillity, and visual disturbance for locals and visitors. **Significant** residual effects arising from the construction have been identified for some visual receptors such as users of public rights of way, residents of local communities and road users."
- 326. 5.2.69 Welcome measures to maintain access to PRoW to minimise diversions and/or closures.

327. 5.2.71 Public rights of way and recreational routes will remain accessible through managed diversions. These diversions should be prior agreed with the Council PRow and be safe, suitable and commensurate for use. The diversions should be signed
328. 5.2.79 We welcome the assessment of the PRow and mitigation which are likely to arise as significant and welcomes working with the applicant regarding the outline PRow Management Plan to identify the management and mitigation measures to be implemented to avoid any significant effect on PRow during all phases of the project and the Council welcomes the opportunity to discuss the additional mitigation required.
329. 5.2.80 We welcome the assessment of walkers, cyclists and horse riders of public rights of way who may experience increased journey distance due to the permanent diversions/realignment of the public rights of way during the construction and maintenance phase.

**PEIR Volume 1 - Outline Onshore CoCP and Outline Construction Traffic Management Plan (CTMP) Chapter 10 Health and Wellbeing LLK1-ARU-REP-ENV-00010 January 2026 Version 0.0**

330. Table 10.11
331. SRT:1 Design and embedded mitigation and control measures relevant to Health and Wellbeing lists Outline Onshore CoCP and Outline Construction Traffic Management Plan (CTMP) as the compliance mechanism, the Council request that a PRow management plan is also provided to cover all works and diversions to the PRow network.
332. TT9 should also refer to a PRow MP and prior agreed with the Council.
333. 10.8.11 to 10.8.15 the Council cannot comment until diversions routes and Road Safety Audits (if required) have been identified and assessed. This section also refers the chapter 17 paragraphs 17.9.21 and 17.9.22 for details of temporary diversions and realignment descriptions. Although these paragraphs do not appear to correlate.

**PEIR Volume 1 Chapter 13 Landscape and Visual LLK1-ARU-REP-ENV-00013 January 2026 Version 0.0**

334. Table 13.1 notes that “Users of PRow may be visual receptors of the Proposed Scheme and have been considered in the assessment of visual impacts.”
335. Table 13.6 states that PRow users have been scoped into Construction, Operation and Decommissioning for LVIA
336. Table 13.7 Data sources used to inform LVIA , Source data: Natural England, Ordnance Survey Data and Local Planning Authorities Definitive Maps. Baseline data: PRow, including National Trails and long-distance recreational routes. The Council requests that the definitive map data is obtained from the definitive map team and not solely reliant on the information on the website, as the def map team may be able to supply more information to inform accurate mapping. Also do not rely on walked routes or signed route on site, as these may differ from the legal definitive routes. Use DEF map to get data: <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way>

337. 13.6.30 There is no mention of the King Charles III coast path or locally promoted routes, which can be found on the discover Suffolk website: <https://www.discoversuffolk.org.uk/explore-suffolk/>
338. 13.6.123 Have the views been taken from the height of all user types, especially for Bridleway affected, for example cyclists, horses, and horse riders? There is guidance from the British Horse Society on construction near horse accessible routes. <https://www.bhs.org.uk/media/kvbajook/construction-sites-0824.pdf>

**PEIR Chapter 16 Socio-economics, Recreation and Tourism LLK1-ARU-REP-ENV-000016 January 2026 Version 0.0**

339. Table 16.21 does not include all the locally promoted routes affected by LionLink, which can be found on the discover Suffolk website: <https://www.discoversuffolk.org.uk/explore-suffolk/>
340. The Council welcomes the inclusion of the other national and promoted routes including KCIII coast path.
341. Table 16.25 Summary of assessment of residual effects during construction. It was expected that the assessment would consider the qualitative sensitivity of receptors and there was hope that this would ensure that the impact on the amenity value of the PRow network would be adequately recognised. However, this does not seem to be the case, which is both disappointing and concerning that quality of user experience is not recognised as being inherent in a recreational context.
342. 16.4.15 with regards to surveys of PRow, this information appears to be different to that contained in 17.4.15b.

**PEIR Volume 1 Chapter 17 Traffic and Transport LLK1-ARU-REP-ENV-000017 January 2026 Version 0.0**

343. Table 17.1 List of Relevant national policy for Traffic and Transport page 5, National Planning Policy Framework, Schedule 9 (Ref 4) paragraphs 109, 155 listed with regards to PRow. No reference to paragraph 105: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.
344. Table 17.3 the Council welcomes the provision and/or upgrades of PRow to provide non-motorised links to allow safe off road access to the proposed converter station for staff. These routes should meet current Council guidance and to be agreed with the Council.
345. 17.4.15b. What days in August 2024 and 2025? And what were the weather conditions on the days chosen for the PRow surveys? Why only one day? Where were the PRow survey locations?
346. Table 17.8 PRow diversion and closure sensitivity document WebTAG Unit A4.1 Social Impact Appraisal (Ref 14) has been used to calculate impact on the PRow, however this document is not a rural PRow related document and would reflect the rural Suffolk PRow network and its usage. The references to DMRB are more for classified and trunk roads. So the Council questions this approach to assessing on the PRow due to diversions and closures.

347. Table 17.9, the Council welcome the naming convention.
348. Table 17.10 The below codes should also be included in the PRowMP.
- a. TT9 the Council would ask for as many routes as safely and practically as possible to remain open to users and for diversions not to be the first option. Our preference is for manned crossings that give priority to PRow users.
  - b. TT13 and previously agree with the Council.
  - c. TT16 the Council requests that it is advised of all closures and signage in a reasonable time prior to the event taking place. Also we would like more information on how this is to be managed in a PRow MP.
349. 17.9.23 the Council requests that it is advised of all closures and signage in a reasonable time prior to the event taking place. Also we would like more information on how this is to be managed in a PRow MP.
350. 17.9.24 recognition of significant adverse effects of more than 8 weeks which affect more than 10 users a day. Have the routes with less than 10 users been identified?
351. 17.10.6 Three PRowS would be either permanently re-aligned or diverted:
- a. E-354/006/0 (Full Build Out of Kiln Lane Substation only);
  - b. E-491/006/0; and
  - c. E-491/005/0.
352. 17.10.7 anticipates that users of E-354/006/0 are likely to experience significant adverse effects and their journey time could increase by approximately 500m.
353. The Council welcomes working with the applicant regarding the outline PRow Management Plan to identify the management and mitigation measures to be implemented to avoid any significant effect on PRow during all phases of the project.
354. The Council welcomes the opportunity to discuss the additional mitigation required for any of the permanent diversions of PRow at the substation and converter sites. (E-354/006/0, E-491/005/0 and E-491/006/0.
355. 17.12.7 the Council welcomes working with the applicant regarding the outline PRow Management Plan to identify the management and mitigation measures to be implemented to avoid any significant effect on PRow during all phases of the project and the Council welcomes the opportunity to discuss the additional mitigation required.
356. The Council is disappointed that the effects considered focus solely on changed in journey length, local travel patterns and severance. It was expected that the assessment would consider the qualitative sensitivity of receptors and there was hope that this would ensure that the impact on the amenity value of the PRow network would be adequately recognised.
357. NSIP PRow Guidance can be found here: <https://www.suffolk.gov.uk/asset-library/green-access-prow-guidance.pdf>

## **APPENDIX 1: PRow Guidance**

### **Guidance for matters to be included a PRow Strategy or Management Plan**

- a. Early engagement with the County Council PRow & Access Team to discuss the impact on and management of the PRow & access network. The Council is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.
- b. The Applicant must obtain the Definitive Map and Statement from the PRow & Access Team at The Council. This is the only source of the up-to-date record of the PRow (supplied digitally).
- c. Public rights of way should be marked on plans using the SCC digital data and labelled as per the Definitive Map and The Council convention (Area -parish number - path number)
- d. Identifies where and how (i.e. physical disruption and impact on amenity) the project affects PRow in the pre commencement stages, construction, and operational phase.
- e. Identifies the wider access network and ensures continuity of the access network including links to U roads, quiet lanes and promoted routes by avoiding severance or sterilisation of an area through closures.
- f. Sets out the management measures for minimising disruption to the public and ensuring public safety during all stages of the project.
- g. The hierarchy for managing affected PRow should lead with the principle of keeping PRow open though use of signage and traffic management measures, followed by temporary closures with alternative routes provided for as short a duration as possible.
- h. Identifies the PRow proposed to be temporarily closed and/or management measures.
- i. Includes management measures for any shared construction access.
- j. Identifies any PRow to be permanently closed and the alternative route/s including the specification for new routes.
- k. Includes plans for restoration of all affected PRow – e.g. on access routes and crossing points.
- l. Includes a pre and post condition survey to be undertaken including identification and assessment of surface condition and with a scope of coverage and methodology to be agreed with The Council (SCC) as Highway Authority. This should include pre-construction work where PRow might be used to gain access to the corridor and reinforcement required prior to use by vehicles.

- m. Where impacted by the works, commitment to restoring any PROW to original condition or to a condition agreed with SCC - where there are existing defects, the applicant should agree restoration measures with the County Council.
- n. Identifies any decommissioning work that will affect the access network and provides proposals for mitigation and restoration.
- o. Includes details and specifications for any improvement works or other mitigation measures that may be required as a result of the EIA.

**Principles for the practical management of affected Public Rights of Way**

358. The Council expects the following principles to be followed;

- a. Early engagement with the County Council PROW & Access Team to discuss the impact on and management of the PROW & access network. The Council is the Highway Authority for public rights of way and the Access Authority for Open Access land and the National Trail.
- b. Where PROW cross the cable corridor, haul road, access tracks and other sites, the surface must be always kept in a safe and fit condition for all users to the satisfaction of the County Council.
- c. Pre-construction works must not obstruct or disturb any public rights of way (e.g., new fencing, archaeology surveys etc) unless otherwise agreed with the County Council. Management measures or temporary closures not covered in the DCO must be by application to the County Council.
- d. Public rights of way that are used for any stage of construction access should remain open, safe, and fit for the public to always use with management measures put in place with the agreement of the County Council.
- e. Any temporary closure of a PROW must be agreed with the County Council and the duration kept to the minimum necessary
- f. An alternative route must be provided for any public right of way that is to be temporarily closed prior to closure to a standard agreed with the County Council
- g. The location of alternative routes to be agreed with the Council.
- h. Any alternative route must be safe and fit for the public to always use – suitable surface, gradient and distance with no additional road walking between the natural destination points.
- i. Any temporary closure and alternative route will be advertised in advance on site and in the local media, and to the local parish councils including a map showing the extent of the closure and alternative route – process and cost to be agreed between applicant and SCC.
- j. There will be no new gates or stiles erected on any public rights of way that are impacted by the cable corridor and any other associated site.

**Sources of further information**

- a) National Grid Ventures LionLink web pages

<https://www.nationalgrid.com/national-grid-ventures/lionlink/about>

- b) Suffolk County Council LionLink web page

<https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsips-in-suffolk/lionlink>