

SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE

EIA Scoping Opinion Response

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Glossary of Acronyms and Abbreviations

<i>AIL</i>	<i>Abnormal Indivisible Loads</i>
<i>AWRP</i>	<i>Advanced Water Recycling Plant</i>
<i>CEMP</i>	<i>Construction Environment Management Plan</i>
<i>DCO</i>	<i>Development Consent Order</i>
<i>DEPZ</i>	<i>Detailed Emergency Planning Zone</i>
<i>EIA</i>	<i>Environmental Impact Assessment</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>HDD</i>	<i>Horizontal Directional Drilling</i>
<i>HE</i>	<i>Historic England</i>
<i>HER</i>	<i>Historic Environment Records</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>LiDAR</i>	<i>Light Detection and Ranging</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>OSEP</i>	<i>Outline Skills and Employment Plan</i>
<i>PIS</i>	<i>Preservation in Situ</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>REPPIR 19</i>	<i>Radiation (Emergency Preparedness and Public Information) Regulations 2019</i>
<i>SBIS</i>	<i>Suffolk Biodiversity Information Service</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SPA</i>	<i>Special Protection Area</i>
<i>SRN</i>	<i>Strategic Road Network</i>
<i>SSSI</i>	<i>Site of Special Scientific Interest</i>
<i>SWRTS</i>	<i>Suffolk Water Recycling, Transfer and Storage</i>
<i>WRC</i>	<i>Water Recycling Centre</i>

“The Council” / “SCC” refers to Suffolk County Council.

Purpose of this Document

Suffolk County Council has prepared the document to respond to the Planning Inspectorate's request for an Environment Impact Assessment (EIA) Scoping Opinion for the proposed Essex and Suffolk Water Suffolk Water Recycling, Transfer and Storage (SWRTS) scheme.

1 Introduction

- 1.1 The proposed development is to build an Advanced Water Recycling Plant (AWRP) with a maximum daily deployable output of 11 million litres a day (11 ML/d). The site for the AWRP is likely to require approximately 9 hectares (ha). The AWRP will receive up to 16 ML/d of treated wastewater from the existing Lowestoft Water Recycling Centre (WRC) which is owned and operated by Anglian Water Services.
- 1.2 The works will also include the construction of a new pumping station and potential minor modifications to the existing Lowestoft Water Recycling Centre (WRC) to divert treated wastewater to the AWRP and two proposed storage reservoirs for the storage of drinking water, located at strategic locations for onward supply and will be sized to provide 36 hours of storage. The central reservoir will have a capacity of approximately 17ML and the western reservoir will be approximately 13ML. The reservoirs will likely require a construction site size of approximately 4ha each.

2 General Comments

- 2.1 This document is Suffolk County Council's (SCC) response to The Planning Inspectorate's request for comments to inform the adoption of an Environmental Impact Assessment (EIA) scoping opinion by the Planning Inspectorate regarding Essex and Suffolk Water's Water Recycling, Transfer and Storage project.
- 2.2 This response contains the technical comments of staff directly employed by Suffolk County Council (SCC) specifically on the question of the adoption of an EIA Scoping Opinion and is not intended to comment on the merits of the proposals. SCC's position on the merits of the proposal will be informed by its Energy, Water, Commercial, Transport and Adaptive Infrastructure Policy¹.
- 2.3 SCC considers that cumulative impacts need to be fully assessed. The proposed scope of assessment appears inadequate, in part, due to the unnecessarily

¹[https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=\(24-02-2026\),%20The%20Cabinet](https://committeeminutes.suffolk.gov.uk/DocSetPage.aspx?MeetingTitle=(24-02-2026),%20The%20Cabinet)

restrictive criteria for identifying cumulative developments. Further detail is provided in the detailed part of this response.

- 2.4 Robust mitigation measures should be included in the Environmental Statement to ensure impacts potentially resulting from the development are minimised as far as possible. The Council expects ongoing engagement during the formation of the final application in order for these measures to be discussed and agreed as far as possible prior to submission. Other relevant authorities and statutory bodies should also be engaged in a similar way.
- 2.5 The potential for impacts arising from odour are of particular concern for the Council given the nature of the project, which will involve disposal of product removed from treated water and the options for the AWRP being near settlements. SCC does not agree that odour impacts may be scoped out as stated in paragraph 15.5.21. Rather, a robust assessment based on modelling in accordance with relevant guidance on best practice should be included in the Environmental Statement in order to inform adequate monitoring and mitigation measures. Without this, SCC does not see how there can be confidence that the application will satisfy paragraph 4.6.7 of the National Policy Statement for water resources infrastructure² which states:
- i. *“The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of dust, odour, artificial light, smoke and steam.”*
- 2.6 In what follows, detailed comments are provided on the applicant’s EIA Scoping Report.

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https://assets.publishing.service.gov.uk/media/6874ca77c831dea2b152cfe9/E03400114_National_Policy_Statement_for_Water_Resources_Web_Accessible.pdf

Impacts by Service Area

3 Archaeology

- 3.1 Suffolk County Council Archaeological Service (SCCAS) are pleased that archaeology and heritage have been included in the list of impacts to be considered as part of the EIA for the SWRTS scheme.
- 3.2 SCCAS welcome that the scoping documents recognise, at a high level, the potential impacts of the proposed scheme upon above and below ground archaeology and heritage. From the information provided in the EIA scoping reports, all elements of the scheme (the pipe routes, haul roads, compounds, reservoir sites, recycling centre sites, Horizontal Directional Drilling (HDD) pits, and ecological mitigation etc.) will damage or destroy any surviving archaeological remains. However, the current study area has in most parts never been subject to systematic archaeological investigation and, therefore, the character, extent, and significance of surviving above and below ground heritage assets across this area has yet to be defined.
- 3.3 As such without further assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.
- 3.4 SCCAS is pleased that the scoping documents recognise the need for archaeological assessment and mitigation work in association with the scheme and also that provision has been made to assess the impact of the proposals upon the setting of above ground heritage assets.
- 3.5 As has been shown by the East Anglia One (EA1), Sizewell C, Lionlink and Sealink schemes, time will again be a critical factor for SWRTS. Archaeological and heritage assessments and mitigation phases must be programmed into the project at the earliest opportunity, with sufficient time allowed to enable fieldwork to be completed prior to the start of construction works, to avoid any delays to the development schedule.
- 3.6 SCCAS would strongly advise that a dedicated archaeological consultant is appointed to the project at this stage in project planning to try to ensure the smooth delivery of the archaeological requirements for the project alongside other elements of the scheme.

Baseline Information

- 3.7 Data regarding known above and below ground heritage assets present within the study area comes from information recorded within the County Historic Environment Records (HER) and from designated heritage assets.

- 3.8 SCCAS is pleased that provision has been made to consult the County HER to identify known undesignated heritage assets within this area. The majority of sites currently recorded on the County HER within the study area have been identified through finds scatters and aerial photography.
- 3.9 The rivers Waveney, Blyth, Yox, and Dove flow through the study area, much of which is situated on light soils (especially in the east of the county), meaning that there are many favourable locations for archaeological activity from all periods. This is attested to by the multi-period finds scatters which have recorded throughout the study area. the central clay in Suffolk, should not be discounted due to lower concentrations of finds as it is becoming clearer due to recent works that this is likely a result of discovery biases.
- 3.10 Current recorded sites within the study area of notable significance include, but are not limited to:
- BLN 009 and any other parts of BLN 066 barrow cemetery
 - LUD 006 and LUD 006 Roman farmstead?
 - SOL 008 Roman Farmstead
 - SOL 035 Roman settlement
 - SBT 018 Sibton Abbey Park
 - HXN 051 likely cemetery
 - YAX 017 likely cemetery
 - YAX 018 likely cemetery
 - YAX 073 Roman settlement (trenched all ready, mitigation defined)
- 3.11 Portable Antiquities Scheme finds (those recorded as monuments on the HER) do not appear to have been included in the lists of HER records. Unless they are confidential, they should be included in the report. Or at the very least their existence and a commitment to understanding impacts on them should be noted. Some of these are indicators of surviving below ground remains of significance.
- 3.12 As the majority of the study area has never been subject to systematic archaeological investigation, there is high potential for additional, and as yet unknown, important heritage assets to survive across much of this area. Some of these may be of national significance and worthy of preservation in situ. This has been clearly demonstrated by the East Anglia ONE (EA1), Sizewell C, Lionlink and Sealink schemes, where a significant number of archaeological sites have been defined, the majority of which were not previously recorded on the County HER or associated with finds scatter or cropmark evidence which indicated the likely presence of surviving below ground remains.

- 3.13 Archaeological investigations immediately adjacent to the study area have yielded extensive multi-period archaeological remains, (e.g. Eye, Halesworth, Saxmundham and Sizewell areas) some of which are not yet fully recorded on the HER. This highlights that similar archaeology is likely to continue into the study area, particularly given the comparative soils and topography. An effort should be made to obtain information regarding the results from projects which interact with or are immediately adjacent to the scheme area.
- 3.14 As such, thorough desk top assessment and field evaluation is needed to allow the archaeological potential of the different parts of the study area and therefore the likely impacts of the proposed development, to be fully assessed. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

Methodology

- 3.15 SCCAS would advise that the impact of this development upon archaeology and heritage cannot be assessed until a full archaeological evaluation has been undertaken over the whole development area. The results of this work will enable an accurate review of the nature, quality, and extent of the archaeological resource across the study area. Archaeology and heritage should be factored into the decision-making process regarding the final reservoir sites and pipe route (plus associated infrastructure locations); therefore, the information generated through archaeological evaluation must be available at an early stage.
- 3.16 As identified in the scoping documents a desk-based assessment would be appropriate in the first instance for the entire study area. This should include a historic map regression, a study of aerial photography (including historic imagery), an assessment of Light Detection and Ranging (LiDAR) data, and predictive modelling of potential based upon topographic and geological evidence (including palaeolithic assessment). Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.
- 3.17 A settings impact assessment for above ground heritage assets should be undertaken and the impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data.
- 3.18 SCCAS would advise that all areas which will be impacted upon by the different elements of the SWRTS scheme, or which form possible option sites, should be subject to archaeological field assessment at this stage in considering the location, layout and design of reservoir sites and pipe routes, to allow for preservation in situ where appropriate of any sites of importance that might be

defined (and which are currently unknown) and to provide information to contribute to the site selection process.

- 3.19 The approach to evaluation can be refined following desk-based assessment.
- 3.20 Geophysical survey (a combination of magnetometry and resistivity as appropriate), also accompanied by fieldwalking and a metal detecting survey, should form a first phase of field evaluation
- 3.21 The results of these assessments should be used to then inform a programme of trial trenched evaluation (and potentially palaeolithic evaluation fieldwork), combined with palaeo-environmental assessment in river valley areas.
- 3.22 SCCAS would advise that all sites which will be impacted by any element of the onshore works should be subject to trial trenching at EIA stage. Undertaking full archaeological evaluation at this stage will enable the results of the surveys to be used to assist with project programming and also to contribute to risk management. Upfront work will ensure all options can be properly considered (including giving proper thought to preservation in situ and alternative solutions), avoiding unexpected costs and delays post-consent. Evaluation at this stage will test the suitability of sites for development, given the reduced flexibility for mitigation through design once reservoir sites and pipe routes are finalised.
- 3.23 The combined results of the above assessments should then be used to develop a mitigation strategy for the reservoir sites, pipe route, and all associated infrastructure. Some areas (as yet unidentified) may require localised preservation in situ (PIS) where appropriate. For surviving below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy remains and (2) where mitigation through recording is considered acceptable, the resultant mitigation included should include proposals to record and advance understanding of the significance of heritage assets before they are damaged or destroyed. Appropriate mitigation techniques, such as excavation prior to development, will be based upon the results of the suite of evaluation and assessment work undertaken. Proposals for outreach and enhanced public understanding as part of this mitigation work should also be included.
- 3.24 All phases of archaeological evaluation and mitigation must be subject to detailed Written Scheme of Investigations, which must be agreed with SCCAS. All stages of the work will be monitored by SCCAS on behalf of the Local Planning Authority and Planning Inspectorate to ensure the written schemes are satisfactorily fulfilled. The reference to the role of SCCAS/HE (Historic England) is welcome within the scoping documents (Para 11.3.1 scoping report).

Specific comments

- 3.25 2.4.6 CEMP should also reference archaeology.

- 3.26 3.3.20 Pre-commencement works involving ground disturbance do have the potential to have significant impacts upon any archaeological remains which are present. Archaeological evaluation and mitigation MUST be completed in each area of the scheme prior to any other pre-commencement works involving ground disturbance. This expectation should also be highlighted within the archaeology chapter of the ES.
- 3.27 11.1.6 Name the archaeologist please.
- 3.28 11.3.5 This has been agreed; some boreholes will be monitored by a geoarchaeologist with all results being combined into an assessment report. One borehole should be moved, or if it cannot be moved should be stripped and fully monitored by an archaeologist.
- 3.29 11.4.1 DBA should also include a historic map regression and predictive modelling of potential based upon topographic and geological evidence. The impact of the proposals upon historic hedgerows, boundaries and other historic landscape elements should also be considered through the use of historic mapping and Historic Landscape Characterisation data. Landscape should be considered for assessment as an aspect of the historic environment. The DBA also needs to take the results from other schemes it interacts with into consideration.
- 3.30 11.5.2 Also any pre-commencement works involving ground disturbance, compounds, ecological mitigation etc.
- 3.31 11.5.5 and 11.5.6 (and table 11.4) Unless any works were to take place within PIS areas.
- 3.32 11.5.11 Or within PIS areas.
- 3.33 11.7.4 Strip map and excavate (sampling defined by SCCAS, with potential for lower percentages but not as a certainty), depending on nature of works and potential.
- 3.34 11.7.7 Also setting out measures to ensure archaeological mitigation and PIS requirements are followed during construction
- 3.35 (e.g. system to ensure that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS are suitably protected. The CEMP should also set out the

provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas (if relevant).

- 3.36 11.8.2 Whole scheme has archaeological potential. Full RLB area needs geophysics and eval. Potential for extensive and currently unknown remains (including though of high significance) to be present throughout the route as majority has seen limited previous archaeological assessment. Also, geophysics will not pick up all heritage assets, including some of potentially national significance e.g. cemeteries. Full and thorough evaluation essential to inform scheme design and appropriate mitigation.
- 3.37 11.8.11 (and table 11.4) does not mention set piece excavation, only SMS (with the attendant issues of SMS in 11.7,4 already noted)
- 3.38 11.8.16 Designated assets within the scheme are currently known...
- 3.39 23.2.1 interactions noted, but in general terms, these will need to be specific to archaeology, notably preservation in site defined by other schemes.
- 3.40 Appendix 11.1 - 1.5 Missing SCCAS guidance and Fieldwork Standards in the East of England

4 Ecology

- 4.1 The full Ecological Impact Assessment report must include the assessment of impacts such as noise, visual disturbance, loss of habitat connectivity, air quality and how these impacts will be mitigated.
- 4.2 The significance of the impacts on protected species and habitats should be explained in detail (refer to CIEEM guidelines on the significance of impacts on ecological receptors).
- 4.3 The Ecological Impact Assessment report must include robust mitigation measures to ensure that impacts on protected species and habitats potentially resulting from the development are minimised as far as possible.
- 4.4 There are numerous internationally designated sites (Special Protection Area, Special Area of Conservation, RAMSAR sites) within and close to the proposed scheme limits, including Broads SPA/RAMSAR site, Minsmere-Walberswick SPA/RAMSAR site, Alde-Ore Estuary SPA, Benacre to Easton Bavents SPA and the Outer Thames Estuary SPA. A habitat regulations assessment/appropriate assessment will be required to assess the potential impacts of the scheme on the abovementioned designated sites and the species associated with them (Marsh Harrier, Bittern, Otter, Great Crested Newt, Woodlark for example).

- 4.5 Additionally, there are numerous Sites of Special Scientific Interest within or close to the proposed scheme limits. These include Sotterley Park SSSI (designated for its ancient woodland habitat), Snape Warren SSSI (designated for its saltmarsh and mudflat habitats), Metfield Meadow SSSI (designated for its unimproved grassland habitat) and Chippenhall Green SSSI (designated for its unimproved grassland habitat). The proposed pipeline route must be carefully chosen so as to avoid all of these ecologically sensitive habitats and must avoid severing connectivity to these habitats.
- 4.6 There are also other designated sites within the proposed DCO boundary. These include Local Nature Reserves, County Wildlife Sites and Roadside Nature Reserves. Further information on these sites can be obtained from Suffolk Biodiversity Information Service (SBIS). Should any of these sites be potentially impacted by the works, the applicant should demonstrate how impacts on these sites will be mitigated for and minimised.
- 4.7 SCC Ecology have not seen surveys for breeding birds, amphibians (including Great Crested Newt), badger, bats, water vole, otter, other mammals, INNS, reptiles, and invertebrates to be carried out. All surveys need to be undertaken by suitably qualified ecologists at the appropriate time of year (see CIEEM guidelines). The habitat baseline within the proposed red line boundary will also need mapping for BNG purposes.
- 4.8 Suffolk Biodiversity Information Service (SBIS) should be contacted regarding protected species and habitats records within the proposed DCO boundary limits.
- 4.9 SCC Ecology would like to see a copy of the 2025/2026 wintering bird survey report once this is available.
- 4.10 Where non-designated roadside verges may potentially be impacted (by new access points off existing highways for example), these will need assessing for their biodiversity value. Roadside verges provide a valuable corridor for wildlife to enable them to move between habitat areas.
- 4.11 SCC Ecology would like to understand the applicant's proposals on how the scheme will deliver Biodiversity Net Gain, and whether this will use onsite habitat enhancement/creation measures or the purchase of offsite habitat units (or a combination of both options).
- 4.12 All species survey results should be shared with Suffolk Biodiversity Information Service (SBIS).
- 4.13 SCC Ecology would like to know whether Marine Net Gain is being considered for the Long Sea Outfall installation. If so, the applicant should explain how this will be achieved.

- 4.14 SCC Ecology would like to understand whether any marine habitat impacted by the installation of the Long Sea Outfall will be reinstated to its original condition once all works are complete.
- 4.15 The Applicant should quantify the potential for disturbance of species associated with the National Site Network sites within and adjacent to the proposed DCO boundary, such as the Benacre to Easton Bavents SPA, Minsmere to Walberswick SPA, Outer Thames SPA, Broadland SPA/RAMSAR site and the Breydon Water SPA. This topic should be covered in the Habitat Regulations Assessment report for the application.
- 4.16 The Applicant should investigate which habitats will be impacted by location of where the Long Sea Outfall meets the coastline and demonstrate how potential impacts at the landfall site will be mitigated as well as any reinstatement measures.
- 4.17 Freshwater ecology: all potential impacts on watercourses and the species dependent on them should be assessed by appropriately qualified river condition assessment ecologists. This will also include the habitat baseline for BNG requirements.
- 4.18 Any surveys for INNS should be robust and include methodology for managing or eradicating these species if they are found to be present within the proposed working areas of the development. The proposed scheme limits are located in an area where Chinese Water Deer and Muntjac (amongst other species) are known to be present in high numbers and the applicant should draw up an appropriate deer management plan to demonstrate how these species will be managed to avoid damaging any newly created habitat areas within the DCO boundary.
- 4.19 The Applicant should demonstrate how any temporary loss of habitat connectivity created during the pipeline installation and other operations within the DCO boundary will be managed. Temporary measures such as dead hedging or Heras style fencing covered in fake vegetation have been used on other schemes previously where there are any gaps in hedgerows created to retain habitat connectivity overnight for species such as bats.
- 4.20 Should you wish to discuss any of the above matters, please contact the SCC Ecology Team and we will be happy to discuss these matters and provide any relevant information as required.

5 Economy, Skills, and Tourism

- 5.1 SCC welcomes the inclusion of socio-economic effects within the scope of the Environmental Impact Assessment and the commitment to prepare an Outline Skills and Employment Plan (OSEP). However, Chapter 17 appears primarily focused on baseline economic conditions, employment and business activity and

provides limited detail regarding the assessment of workforce demand, labour market capacity, skills requirements, education and training provision, workforce accommodation, and supply chain opportunities. SCC considers that these matters have the potential to give rise to both beneficial and adverse effects during construction, operation and decommissioning and should be explicitly assessed within the Environmental Statement.

- 5.2 In preparing the Environmental Statement, the Applicant should reference SCC's The Socio-economic Effects of NSIPs (2025). The assessment should focus on likely socio-economic effects rather than baseline conditions alone and should clearly define the assessment methodology, study areas, assumptions, significance criteria, and assessment thresholds.
- 5.3 SCC notes the workforce and economic study areas set out in Section 17.2.2. Whilst these may be appropriate for certain socio-economic receptors, the Environmental Statement should demonstrate that the selected study areas are suitable for assessing workforce demand, labour market capacity, skills availability, education provision, and supply chain opportunities. Consistent with SCC guidance, workforce catchments and supply chain catchments should be assessed separately and supported by a clear evidence base.
- 5.4 The Environmental Statement should provide a detailed assessment of workforce demand across construction, operation, maintenance and decommissioning phases, including workforce numbers, occupations, skill levels, workforce origins, and labour catchments. The assessment should compare projected workforce requirements against available labour supply and identify any potential labour shortages, recruitment pressures, labour displacement, competition for workers and cumulative labour market effects. SCC guidance also expects the assessment of low, medium, and high home-based workforce scenarios, with the low home-based workforce scenario forming the basis of the worst-case assessment.
- 5.5 Cumulative workforce and skills impacts will be particularly important given the scale of infrastructure development anticipated across Suffolk and the wider East of England during the projected construction period. The Environmental Statement should therefore assess cumulative labour demand arising from other major energy, nuclear, transmission, utility and infrastructure projects and identify the extent to which cumulative demand could exacerbate labour market pressures, skills shortages, and workforce displacement.
- 5.6 Where workforce requirements cannot reasonably be met locally, the Environmental Statement should assess the implications for housing, temporary worker accommodation, transport networks, and local services, including cumulative effects with other major developments.

- 5.7 The Scoping Report proposes to scope out operational employment, skills, and labour market effects. SCC does not consider that these matters should be scoped out solely on the basis of anticipated workforce numbers. Whilst operational employment may be limited compared with construction, the roles are likely to be skilled and long-term in nature and may contribute positively to workforce retention, technical capability, and skills development within Suffolk. The Applicant should therefore provide a robust justification for the proposed scope out or undertake a proportionate assessment of operational effects.
- 5.8 The Environmental Statement should also include a dedicated assessment of supply chain opportunities and effects. Consistent with SCC guidance, this should assess opportunities at hyper-local, county, and regional levels and identify the extent to which procurement expenditure may be secured by local businesses.
- 5.9 SCC notes the proposal to scope out education and visitor facilities because the Proposed Development does not include dedicated education infrastructure. Whilst SCC accepts this position in relation to physical facilities, the Environmental Statement should nevertheless assess the capacity of the education and skills system to support workforce requirements generated by the Proposed Development. This should include consideration of further education, higher education, apprenticeships, independent training provision, curriculum alignment, and skills gaps.
- 5.10 The OSEP should be informed by the findings of the socio-economic assessment and developed in consultation with SCC's Regional Skills Coordination Function and relevant stakeholders. It should identify proposed skills, employment and social value interventions, delivery arrangements, monitoring mechanisms and measurable outcomes, including apprenticeships, work experience, training opportunities, and support for under-represented groups.

6 Flood and Water Environment

- 6.1 The applicant will need to undertake an assessment of flood risk to ensure that the infrastructure is in the lowest areas of predicted flood risk (fluvial, pluvial, groundwater, foul and reservoir) and does not increase flood risk of any type to others. This assessment should include consideration of the national flood maps³, national standards for SuDs⁴ and SCC's local SuDs guidance as LLFA⁵.

³<https://flood-map-for-planning.service.gov.uk/>

⁴<https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds>

⁵

<https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf>

- 6.2 The development will need to manage the surface water runoff from the permanent and temporary sites and ensure that flood risk and pollution is managed to national and local policy/guidance.
- 6.3 Any impoundment of water will cause a potential flood risk, and breach scenarios should be modelled to show the potential impact on adjacent landowners and infrastructure.
- 6.4 The applicant should look to undertake ground investigations to ensure that the infrastructure does not cause harm to groundwater.
- 6.5 Any crossings of watercourse should be done by direct drill beneath the bed of the watercourse (min 1.5m) where possible. Where a temporary open trench crossing is required, consent/permitting from the relevant authority (EA, LLFA, IDB) will be required and the watercourse be reinstated as previous.

7 Highways

- 7.1 Suffolk County Council (SCC), in its capacity as the Local Highway Authority (LHA), has reviewed the traffic and access information contained within the Environmental Impact Assessment Scoping Report.
- 7.2 The following comments identify matters that SCC considers should be addressed as the project progresses. They relate principally to the proposed study area, data collection, construction traffic, workforce movements, cumulative effects, assessment methodology, mitigation, management plans, Abnormal Indivisible Loads, and the information required to support the future Transport Assessment.

Study Area

- 7.3 The study area should include:
 - the A12 between the A14 Seven Hills Interchange and Lowestoft.
 - the A140 between its junction with the A14 and its junction with the A143; and
 - any other roads that may provide access to or from the construction areas, including the A1120, A144 and A145.
- 7.4 It is noted that paragraph 13.2.4 identifies the A1120, A144 and A145 as roads that may also be included. Where these or other roads may be used by construction traffic or affected by the proposed works, they should be included within the study area and assessment.
- 7.5 The list in paragraph 13.2.2 appears to exclude local C roads and unclassified roads. These roads should be included where they may be used by construction traffic or otherwise materially affected by the proposed development.
- 7.6 SCC notes the applicant's proposal to use haul roads to keep traffic off parts of the public highway network. However, the construction of haul roads may itself

generate additional construction vehicle movements. These movements should be taken into account within the relevant traffic forecasts and assessments.

- 7.7 Within paragraph 13.1.2, the definition of an HGV should be refined for clarity. For other Nationally Significant Infrastructure Projects (NSIPs), an HGV has been defined as a commercial vehicle exceeding 3.5 tonnes.
- 7.8 It is noted from the figures, including Figures 13-1 and 13-2, that the scoping area has been drawn to reflect the proposed works, while highway elements referred to elsewhere fall outside the identified red line boundary. SCC seeks confirmation that all relevant highway elements falling outside the red line boundary will nevertheless be included within the scope of the assessment.
- 7.9 SCC notes that the applicant has provided a list of highway interfaces for each component of the project in Tables 13-2 to 13-12, which the applicant considers should be included within the scope of the assessment.
- 7.10 Insufficient information has been provided at this stage to enable SCC to comment in detail on each interface. In particular, further information will be required regarding:
- the proposed locations and forms of access.
 - the anticipated volume and composition of construction traffic.
 - the proposed construction traffic routes; and
 - the timing and duration of construction activity.
- 7.11 Initial comments are provided below regarding interfaces that may interact with other proposed, consented or under-construction NSIPs.
- 7.12 In Tables 13-2 to 13-12, the term “SRN” appears to have been used to describe several roads that form part of the Local Road Network rather than the Strategic Road Network. The classification of these roads should be reviewed and corrected where necessary.

Data Collection

- 7.13 Caution should be exercised where professional judgement is relied upon in place of recently collected data.
- 7.14 For a scheme of this significance and geographical scope, traffic surveys are likely to be required at specific locations, as available data may be limited, dated, or insufficiently detailed.
- 7.15 While strategic transport models may assist with assessment at a regional level, care should be taken where model outputs are used as a proxy for the assessment of individual junction capacity. Junction-specific assessments should be supported by suitable and sufficiently recent traffic data.

- 7.16 The proposed scope, methodology, timing, and locations of traffic surveys should be discussed with SCC before the surveys are undertaken. This will help to ensure that the data collected are suitable for the proposed assessments and avoid unnecessary or abortive work.

Table 13-5: Proposed WSR Section of the EIA Scoping Area

- 7.17 The preferred option for the WSR is located directly adjacent to the A140, which is the primary north-south strategic route connecting Ipswich and Norwich. However, access may be constrained by the geometry and characteristics of the surrounding highway network.
- 7.18 The cumulative traffic impacts arising from the project, in combination with other proposed, consented or under-construction NSIPs that may use the A140 for construction traffic, should be assessed. This should include, where relevant, the EcoPower and Norwich to Tilbury projects. The assessment approach and findings should be discussed with SCC in its capacity as the LHA.
- 7.19 Table 13-5 of the Scoping Report identifies a potential temporary access from Stuston Lane. However, Stuston Lane does not appear to connect directly to the proposed WSR site. Temporary and permanent access may therefore need to be provided from the A140, Brome Link Road or Eye Road. The proposed access strategy should be clarified.
- 7.20 Although construction routes have not yet been provided, the town of Eye is subject to an environmental weight restriction through its centre. The movement of HGVs through Eye is also a sensitive local issue. These matters should be recognised when identifying and assessing potential construction routes.
- 7.21 The Order Limits to the north of Eye overlap with the proposed EcoPower project, specifically its proposed Areas 1 and 2. The potential interaction between the projects should be considered as part of the cumulative assessment and construction planning process.

Table 13-10: Proposed Saxmundham to Sizewell C Pipeline Section of the EIA Scoping Area

- 7.22 The proposed route for this element of the project will interact with the proposed LionLink cable corridor to the north-east of Saxmundham.
- 7.23 There will also be significant overlap with the Sizewell C project in this area, including the Sizewell Link Road. The Sizewell Link Road and associated changes to the highway network should be reflected in the relevant baseline, future baseline, and traffic assessments.
- 7.24 Table 13-13 does not appear to refer to Abnormal Indivisible Load movements during the operational phase, for example where pumps or other substantial

equipment may require replacement. Although such movements may be limited in number, they may nevertheless be disruptive and should be considered within the assessment.

Alternative Delivery Methods

- 7.25 The applicant should consider alternative methods of delivering construction materials, including the use of rail or seaports where practicable. Several railheads are located within or close to the project area.
- 7.26 The Long Sea Outfall and Advanced Water Recycling Plant sections of the project are in close proximity to Lowestoft and Great Yarmouth, both of which have rail connections and seaport facilities.
- 7.27 The Sizewell C project includes a Beach Landing Facility and a new rail route. As the proposed project includes a pipeline connection to Sizewell C, there may be opportunities for collaborative working or the shared use of Sizewell C facilities. These opportunities should be explored with the relevant parties where practicable.

Construction Traffic

- 7.28 Insufficient information has currently been provided regarding:
- HGV movements.
 - LGV movements.
 - construction workforce numbers.
 - associated workforce traffic.
 - traffic generated by the individual project components.
 - construction traffic routes; and
 - the timing and duration of construction activity.
- 7.29 SCC would welcome early sight of the proposed construction routes to enable it to provide appropriate advice and assist in identifying potential highway constraints.
- 7.30 Paragraph 13.8.10 refers to further work on trip generation and traffic distribution. However, limited information is presently available regarding the likely scale, distribution, and timing of construction traffic.
- 7.31 Detailed traffic forecasts should be provided to enable the magnitude of effects on the highway network to be assessed. The assessment should consider, where relevant:
- driver delay.

- accessibility.
- road safety; and
- highway and junction capacity.

7.32 Detailed construction traffic forecasts should be provided for each principal project component and should include:

- peak construction flows.
- peak daily vehicle movements.
- the proportions of HGV and LGV movements.
- construction phasing.
- traffic routing; and
- workforce movements.

7.33 Within Figure 13-3, some routes are labelled as “local access routes with restrictions”. In several locations, including Leiston and Eye, the relevant restrictions are environmental weight restrictions. These may prevent access by vehicles exceeding 7.5 tonnes unless those vehicles are travelling to premises within the restricted areas.

7.34 The implications of these restrictions should be clearly identified when preparing the construction traffic routing strategy.

Construction Workforce

7.35 Information regarding the construction workforce is currently very limited.

7.36 Workforce movements can represent a significant proportion of construction-related traffic and should therefore be appropriately reflected in the traffic forecasts and environmental assessment.

7.37 A clear workforce travel strategy, supported by evidence-based assumptions, should be provided. This should include details of:

- workforce numbers.
- shift patterns.
- anticipated modes of travel.
- vehicle occupancy assumptions; and
- the measures proposed to manage workforce travel.

Cumulative Impact

7.38 The cumulative traffic impacts arising from this project, in combination with other proposed, consented or under-construction NSIPs that may use the A12 for

construction traffic, should be assessed. The assessment approach and findings should be discussed with SCC in its capacity as the LHA.

- 7.39 In particular, the peak construction period for Sizewell C may coincide with, or take place at approximately the same time as, the delivery of this project. The implications of any overlap should be assessed.
- 7.40 Limited information has been provided regarding the developments and infrastructure schemes that will be included within the cumulative impact assessment.
- 7.41 Traffic flow data should be assessed in combination with the following consented, proposed and under-construction NSIPs where they may interact with the proposed project:
- Sizewell C, under construction.
 - East Anglia ONE North, under construction.
 - East Anglia TWO, consented.
 - Norwich to Tilbury, awaiting a decision.
 - Sea Link, awaiting a decision.
 - LionLink, proposed; and
 - EcoPower, proposed.
- 7.42 This list should not be treated as exhaustive. Other developments and infrastructure projects may also need to be included where they could materially affect the relevant parts of the highway network.
- 7.43 Numerous smaller local developments should also be considered within the cumulative traffic assessment. Details of relevant developments should be obtained from the relevant district and borough councils.
- 7.44 The proposed cumulative assessment methodology, assessment years and development assumptions should be discussed with SCC and the relevant local planning authorities at an early stage.

Management Plans and Control Measures

- 7.45 The proposed control measures do not currently include sufficient consideration of traffic generated by the construction workforce.
- 7.46 SCC acknowledges that limited public transport provision across much of the project area may make workforce travel planning challenging. Nevertheless, the applicant should identify practicable measures to reduce workforce trips by private car and promote sustainable or shared travel wherever possible.
- 7.47 Potential measures could include:

- car sharing.
- crew minibuses.
- the use of public transport where practicable; and
- cycling and walking where appropriate.

7.48 Control measures and management plans should include pre-commencement and enabling works within their scope. Experience has demonstrated that these works can result in significant adverse local effects if they are not appropriately planned and managed.

7.49 The content and scope of the relevant management plans and control measures should be developed in consultation with SCC in its capacity as the LHA.

Assessment Methodology

7.50 Broadly, the proposed assessment approach is considered to provide a reasonable starting point. However, data collection and the application of professional judgement both involve an element of uncertainty.

7.51 Assessment criteria should not be applied rigidly where uncertainties exist within the underlying data or assumptions. An effect should not automatically be dismissed solely because it falls marginally below a specified numerical threshold.

7.52 The sensitivity of receptors and locations will be a key consideration when determining environmental effects. Early engagement between the applicant and SCC would therefore be welcomed to minimise the potential for future disagreement, particularly where assumptions are made regarding local conditions.

7.53 One example of a potentially inappropriate assumption would be concluding that pedestrians do not use a route solely because no dedicated pedestrian infrastructure is present within the highway. The absence of formal infrastructure does not necessarily demonstrate the absence of pedestrian, cyclist, or equestrian use.

7.54 When considering the duration of effects, attention should be given to repeated construction activities within individual communities. While an individual project may result in a short- or medium-term effect, the cumulative effect of multiple projects undertaken over an extended period may constitute a long-term effect for the affected community.

7.55 Examples may include roads or Public Rights of Way that are repeatedly closed and reopened to facilitate several different projects.

Mitigation

- 7.56 Care should be taken when proposing the movement of workers outside established network peak periods as a mitigation measure.
- 7.57 Given the number of NSIPs and other construction projects that may propose similar measures, there is a risk that coinciding shift start and finish times could create a different network peak, for example between 07:00 and 08:00 rather than between 08:00 and 09:00.
- 7.58 Any proposed temporal distribution of construction or workforce movements should therefore be assessed against the anticipated cumulative traffic conditions and not solely against the existing network peak periods.

Transport Assessment and Construction Traffic Management Plan

- 7.59 A Transport Assessment and Construction Traffic Management Plan should be submitted in support of the Development Consent Order application.
- 7.60 These documents should adequately consider the effects of traffic generated by the proposed development, including:
- construction traffic.
 - workforce traffic.
 - pre-commencement and enabling works.
 - operational traffic.
 - Abnormal Indivisible Loads; and
 - cumulative traffic associated with other relevant developments and infrastructure projects.
- 7.61 SCC, in its capacity as the LHA, will need to understand the traffic impacts arising from the proposed development, both in isolation and cumulatively with other consented, proposed and under-construction projects in the surrounding area.
- 7.62 In addition to the implications for network peak periods, the Transport Assessment should consider:
- the suitability of each proposed highway access.
 - the visibility required at each access.
 - consequential effects, including any vegetation removal required to provide suitable visibility.
 - the geometry and physical characteristics of access routes.
 - the suitability of affected roads for the type and volume of traffic proposed.
 - road safety.

- network and junction capacity.
- impacts on Public Rights of Way and non-motorised users.
- the identification of feasible Abnormal Indivisible Load routes; and
- constraints including weak bridges, structures with restricted capacity and restrictive road geometry.

7.63 Surveys and site visits are likely to be necessary to provide sufficient detail to identify the direct and consequential effects of the proposed access arrangements.

Existing Baseline

7.64 No details appear to have been provided regarding the extent or location of the proposed traffic surveys.

7.65 The survey scope, methodology, timing, and locations should be discussed with SCC before the surveys are undertaken. This will help to ensure that the data collected are appropriate for the assessment and avoid unnecessary or abortive work.

7.66 The baseline should be supported by data that are sufficiently recent and representative of typical network conditions. Any adjustments made to survey data should be clearly explained and justified.

Future Baseline

7.67 The number of proposed schemes in the north and east of Suffolk makes the assessment of future-year conditions particularly complex.

7.68 The future baseline, assessment years and assessment scenarios should therefore be discussed with SCC and the relevant local authorities at an early stage. It may be necessary to evaluate several scenarios to account for different combinations of project phasing and delivery.

7.69 The assumptions adopted for each future-year scenario should be clearly documented and supported by appropriate evidence.

7.70 16. Table 13-19: Summary of Traffic and Access Scope

7.71 SCC considers that open spaces, recreational sites, and shopping areas should be included as receptors within the assessment.

7.72 The pipeline corridors cross numerous Public Rights of Way and minor roads that are well used by walkers, cyclists, and horse riders. Public open spaces may also experience reduced use as a result of:

- their proximity to the project.
- temporary or permanent changes to access.

- disruption caused by construction activity; or
- severance of access routes.

7.73 The Applicant should provide an explanation regarding why horse riding has been scoped into the operational phase while walking and cycling have been scoped out.

7.74 Walking, cycling and horse riding should be combined into a single receptor category covering the amenity of all non-motorised users, unless a clear justification is provided for assessing these users separately.

7.75 A similar inconsistency arises in relation to the decommissioning phase, for which horse riding has been scoped out but walking and cycling have been scoped in.

7.76 The receptors assessed for the decommissioning phase should ordinarily be consistent with those assessed during the construction phase, as decommissioning may involve activities and effects similar to those arising during construction. Any proposed differences should be clearly explained and justified.

Abnormal Indivisible Loads

7.77 In paragraph 13.7.10, the applicant states that established management practices are available for moving Abnormal Indivisible Loads (AILs), including the Electronic Service Delivery for Abnormal Loads notification process.

7.78 However, this is a binary notification process under which proposed movements may be accepted or rejected. It does not remove the need to identify and assess the physical and operational constraints affecting potential AIL routes.

7.79 SCC, in its capacity as the LHA, is aware of structures on the highway network that may not be capable of accommodating certain AILs, including vehicles operating under Special Types General Orders.

7.80 Early engagement with SCC is necessary to:

- identify relevant highway and structural restrictions.
- identify potential AIL routes.
- determine whether further structural or route assessment is required; and
- review the capacity of affected structures.

7.81 Where necessary, additional assessment may be required to determine whether mitigation measures relating to highway structures are needed.

7.82 Care should also be taken to ensure that viable routes to key infrastructure remain available during the operational phase, for example where heavy or bulky pumps or other equipment require replacement.

7.83 Potential operational AIL movements should not be scoped out of the assessment, as appears to be proposed in Tables 13-16 and 22-4.

Plans and Drawings

7.84 All relevant plans and drawings should show the Sizewell Link Road and other committed highway mitigation.

7.85 The Sizewell Link Road is currently under construction and is expected to be completed before construction of the proposed project commences. It should therefore be appropriately reflected in the relevant baseline and future baseline plans.

7.86 The Sizewell C Green Rail Route has been constructed and should also be shown on the relevant plans and drawings.

7.87 Plans should clearly distinguish, where relevant, between:

- the existing highway network.
- committed highway schemes.
- proposed project infrastructure.
- temporary access arrangements.
- permanent access arrangements.
- haul roads.
- construction traffic routes; and
- relevant Public Rights of Way and non-motorised user routes.

Relevant Highway Data and Guidance

7.88 Where roads are referenced, road numbers and street names should correspond with those recorded in the National Street Gazetteer.

7.89 Information on the National Street Gazetteer is available from GeoPlace.

7.90 Suffolk County Council's highway guidance for NSIPs is available from the Suffolk County Council NSIP information page for developers and project promoters.

7.91 The walking and cycling route information does not acknowledge the presence of Quiet Lanes. Although Quiet Lanes do not have specific legal protection, they form an important part of the county's non-motorised transport network. Relevant information is available from Quiet Lanes Suffolk.

7.92 Suffolk also has an extensive network of Roadside Nature Reserves. Care should be taken to avoid and protect these areas during construction, including

preventing damage caused by construction traffic using minor roads to access project sites.

7.93 Further information is available through the Suffolk Roadside Nature Reserves interactive map.

Conclusion

7.94 SCC considers that the proposed traffic and access assessment provides a reasonable initial basis for further work. However, additional information and engagement will be necessary to establish a sufficiently robust assessment of the project's highway and transport effects.

7.95 In particular, SCC requests:

- early discussion regarding the extent of the study area and the roads to be assessed.
- early discussion regarding the scope, methodology, timing, and locations of traffic surveys.
- clarification of the proposed temporary and permanent access arrangements.
- detailed construction, workforce, and operational traffic forecasts.
- identification and assessment of proposed construction traffic and AIL routes.
- appropriate consideration of proposed, consented and under-construction NSIPs and other relevant developments.
- consistent consideration of pedestrians, cyclists, equestrians, and other non-motorised users.
- assessment of the cumulative duration and effects of repeated construction activity.
- consideration of alternative delivery methods, including rail and marine transport where practicable.
- preparation of a Transport Assessment and Construction Traffic Management Plan proportionate to the scale and impacts of the development; and
- continued engagement with SCC as the project design, assessment and mitigation measures develop.

7.96 These matters should be addressed, where relevant, through the relevant Environmental Statement, Transport Assessment and associated management plans submitted in support of an application.

8 Joint Emergency Planning Unit

8.1 The Major Accidents and Disaster (MA&D) identifies Sizewell A, B and C as manmade features that are external to the proposed development that could have an adverse consequence.

- The list of legislation should include the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR 19) that pertains to Sizewell B (SZB).
- REPPiR 19 sets legal duties for site operators and local authorities to prepare for and respond to radiation emergencies. It requires Suffolk County Council to prepare and maintain off-site emergency plans based on emergency planning zones.
- Proposed developments in the vicinity of SZB could have health consequences for the workforce or impact on emergency planning arrangements and therefore the project should include the SZB Detailed Emergency Planning Zone (DEPZ) within the Zone of Influence (Zoi).
- The Office for Nuclear Regulation (ONR) includes a wider consultation zone (15km from SZB) for proposed developments that could impact on the viability of the emergency response arrangements. This should also be included within the Zoi.
- Wildfires is a major event category proposed to be ‘scoped out’ of the Environmental Statement (ES). Following the events of this year, the MA&D should consider reinstating wildfires based on the likelihood and potential significance.

8.2 The Cumulative Effects Assessment should include:

- The impact of the project on the safety of SZB, including the cumulative impacts on the transport network.
- The A12 and the main access routes to SZB namely B1122 / Sizewell Link Road (SLR) and B1119 within the Traffic and Access Zoi.
- The North Suffolk Reservoir (NSR) NSIP within the List of Developments.

9 Landscape

9.1 The paragraph numbers included below in brackets refer to the paragraphs in SUFFOLK WATER RECYCLING, TRANSFER & STORAGE EIA SCOPING REPORT VOLUME I: MAIN REPORT August 2026 Planning Inspectorate Reference: WA0210003 Document Reference: 331003515/Vol I/Main Report Revision 01

Study Area

9.2 (10.2.4) Figure 10-4 is referenced regarding representative viewpoints; this should be amended to 10-3. Further, Appendix 10.4 appears not to have been included

with the Scoping documents, only Appendix 10.1, which does not provide any information regarding viewpoints.

- 9.3 (10.6.3) SCC disagrees with the proposal that visual receptors at distances of greater than 2km from the Proposed Development's above ground components during the operational phase, and from main/satellite compounds during the construction and decommissioning phases, can be scoped out of the assessment in the ES. The reason given (that any such changes can be considered unlikely to materially alter the overall balance of features and elements comprising existing views) is too broad-brushed and not evidenced. SCC considers that a ZTV, which was not available at the time of writing the scoping report, should inform the study area (GLVIA3, paragraph 6.45: The study area should be agreed with the competent authority at the outset and should cover the area from which the proposed development will potentially be visible.)
- 9.4 SCC would be able to accept a preliminary 2km (as per GLVIA3, paragraph 6.2), on the basis that this is backed up by further evidence, such as a ZTV, and that there remains room for amendments and exceptions.
- 9.5 (10.6.4-10.6.5) SCC considers that night-time assessments need to be conducted for all receptors that may be affected by the proposals. This includes assessment of lighting as well as noise and vibration and air pollution. Without further information regarding the transient nature and the time frame of construction works, SCC considers that construction works, including in the pipeline corridors must not be scoped out. It is not sufficient to assess effects on above-ground elements, when assessing nighttime effects during construction and decommissioning.
- 9.6 The further limitation of nighttime assessments to 1km distance of the project (as per Table 10-10) is only acceptable, if it can be demonstrated that no significant effects (for example, as a result of lighting, noise, and vibration) would occur beyond this distance.

Baseline Environment

(Table 10-1) Sources of Baseline Data

- 9.7 It should be noted that the Suffolk Landscape Character Assessment describes types rather than areas, and the actual geographical local landscape character areas need to be defined within the type and assessed against the type (i.e., how representative any geographically identified character area is for the type).
- 9.8 It should further be noted that there is a dataset available from SCC for Suffolk Seascape types.
- 9.9 (10.8.38) For nighttime assessments SCC considers that more up-to-date data for light pollution should be considered to back up the CPRE mapping of England's

light pollution and dark skies, based upon satellite data of sky glow during 1014/2015.

- 9.10 The Light pollution map - Go Stargazing website provides images up to 2025. It should be noted, however, that their imaging does not pick up emissions from LED luminaires and therefore may also not be showing the full extent of light pollution. It may however deliver a valuable comparison.

Further Impacts proposed to be scoped out of the assessment

Ancient woodland, veteran, ancient and TPO trees outside the Order limits

- 9.11 (10.6.1) SCC considers that landscape features such as ancient woodland, veteran trees and trees subject to tree preservation orders ('TPOs') located at distances of greater than 15m from the Order Limits need to remain scoped into the assessment in the ES, as it is a) possible that the root protection zones of these could be directly impacted by the Proposed Development's construction, operational or decommissioning activities; and b) there could be indirect impacts and effects on such features, other than those resulting from direct works within the root protection zones, such as air pollution (for example, dust) and contamination (for example, run-off).
- 9.12 It also must be clarified that any distances from trees and woodlands are measured from the canopy edge rather than the boles of the trees.

Hedges

- 9.13 (10.6.2) SCC does not consider it proportionate to scope out the assessment of impacts on individual hedgerows and instead, assess solely the Proposed Development's likely significant effects on hedgerows collectively.
- 9.14 SCC considers that all affected hedgerows need to be accurately surveyed and assessed. Schedules will need to be provided, containing length, length to be managed or removed, species mix, other features (for example, a ditch), and whether the hedgerow is to be considered important under the 1997 Hedgerow Regulations. For Important Hedgerows under the regulations, SCC expects that special measures are considered and applied where possible (for example, HDD or, as a minimum, reduced working corridor widths).
- 9.15 The EIA will need to support the approach to Hedgerows as set out precedent DCOs - see for example EA1 and EA3 see The East Anglia ONE Offshore Wind Farm Order 2014⁶ and The East Anglia THREE Offshore Wind Farm Order 2017⁷. Another example would be the Bramford to Twinstead Important Hedgerow Assessment

⁶ <https://www.legislation.gov.uk/uksi/2014/1599/contents>

⁷ <https://www.legislation.gov.uk/uksi/2017/826/article/32>

EN020002-000627-6.3.7.5 ES Appendix 7.5 Important Hedgerows Assessment.pdf⁸.

- A hedgerow is important, and is protected, if it is at least 30 years old and meets at least one of these criteria:
- marks all or part of a parish boundary that existed before 1850
- contains an archaeological feature such as a scheduled monument⁹
- is completely or partly in or next to an archaeological site listed on a Historic Environment Record (HER)¹⁰, (formerly a Sites and Monuments Record)
- marks the boundary of an estate or manor or looks to be related to any building or other feature that's part of the estate or manor that existed before 1600
- is part of a field system or looks to be related to any building or other feature associated with the field system that existed before 1845 - you can check the County Records Office for this information
- contains protected species¹¹ listed in the Wildlife and Countryside Act 1981
- contains species that are endangered, vulnerable and rare and identified in the British Red Data¹² books
- includes woody species and associated features as specified in Schedule 1, Part II Criteria, paragraph 7(1)¹³ of the Hedgerow Regulations - the number of woody species needed to meet the criteria is one less in northern counties

Proposed Approach to Mitigation

Referring to (10.7.2)

- The design should strive to use existing landscape features and landform to achieve integration and limit visual effects.
- The terminology of 'where practicable' sets too low a bar. It should be 'where possible.'
- A soil management plan will be required.
- A detailed lighting design would need to be provided to be agreed with the relevant local authority.
- It is unclear what is intended for planting.

⁸ [EN020002-000627-6.3.7.5 ES Appendix 7.5 Important Hedgerows Assessment.pdf](#)

⁹ <https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/>

¹⁰ [https://historicengland.org.uk/advice/technical-advice/information-management/hers/ Record \(HER\)](https://historicengland.org.uk/advice/technical-advice/information-management/hers/Record%20(HER))

¹¹ <http://www.legislation.gov.uk/ukpga/1981/69/schedule/5>

¹² <http://jncc.defra.gov.uk/page-3352>

¹³ <http://www.legislation.gov.uk/uksi/1997/1160/schedules/made>

- There should be mitigation for any mature tree lost (ratio of 3 new trees for each tree lost), with impacts on potential veteran and ancient trees being avoided as far as possible, and bespoke compensation where this is not possible.
- SCC considers that ‘where practicable’ should be deleted from secondary mitigation for landscape.
- Tree protection should be in accordance with British Standards Institution’s BS 5837: 2012 Trees in Relation to Design, Demolition and Construction or its succeeding iteration.
- The supply, storage, handling, and implementation of proposed planting should also include BS 8545:2014+A1:2026 Trees from nursery to independence in the landscape – Code of practice.

Proposed Approach to the ES

Assessment Methodology

9.16 Referring to (10.8.6)

- Pre-commencement and mobilisation works should also be considered.
- Decommissioning effects should be considered.

9.17 Referring to (10.8.9)

- SCC queries the reference to N1 (3), as this could not be verified.
- N4 (3) refers to all special qualities and statutory purposes; tranquillity and darks skies are given as examples. SCC expects that impacts and effects on all special and statutory purposes are qualities will be adequately assessed.

Landscape effects

9.18 (10.8.11) Settlements, local highways, PRoW, and individual Dwellings/ farms would usually be considered visual receptors.

9.19 Landscape receptors comprise the local landscape character, the fabric of the landscape and landscape features, such as woodlands, trees, hedgerows, and ponds.

9.20 SCC therefore considers that Table 10-2 needs to be revised.

9.21 (10.8.12) SCC does not agree that the collective approach set out in this paragraph is proportionate or in line with GLVIA3.

9.22 GLVIA3 states:

- Paragraph 3.16: The level of detail provided should be that which is reasonably required to assess the likely significant effects.

- Paragraph: 3.19: Other than any effects that are considered and eliminated at an earlier point, likely significant effects must be considered in the assessment stage of LVIA.
- Paragraph 3.20: In most cases it will be essential to give detailed consideration to both:
 - effects on the landscape as a resource (the landscape effects); and
 - effects on views and visual amenity as experienced by people (the visual effects).

9.23 Paragraph 3.21: In LVIA there must be identification of both:

- landscape receptors, including the constituent elements of the landscape, its specific aesthetic or perceptual qualities and the character of the landscape in different areas; and
- visual receptors, that is, the people who will be affected by changes in views or visual amenity at different places.

9.24 The effects are identified by establishing and describing the changes resulting from the different components of the development and the resulting effects on individual landscape or visual receptors.

9.25 (10.8.14-10.8.15) SCC considers that the impacts and effects on The Broads National Park and the Suffolk and Essex Coast and Heaths National Landscape and their settings, as well as the Suffolk Heritage Coast, will need to be assessed separately.

9.26 SCC further considers that the impacts and effects need to be assessed for these designated landscapes and their statutory purposes as a whole, rather than just for the parts that fall within the study area.

Visual effects

9.27 (10.8.16) Further information is required on visual receptor groups and their sensitivity.

9.28 (10.8.22) SCC welcomes the consideration that landscapes and seascapes classed to be of lower landscape value may still be highly susceptible to the nature of the proposed change.

Visualisations

9.29 There appears to be no information provided regarding the visualisations, the methodology of producing them, or how they will be presented in the ES.

9.30 SCC considers that a rationale will need to be provided for the type of visualisation suggested for each viewpoint and would welcome a sample page for the visual

assessment pages. A good example for a reader friendly layout would be the Bramford to Twinstead Grid Reinforcement scheme.

Criteria for Determining Visual Value

9.31 While Tables 10-3 and 10-4 are broadly acceptable, SCC considers that in Table 10-5, a greater value should be placed on views that are valued by local people and that this should be included within the medium bracket. What is currently considered of very low value would then become of low value, reserving the very low value to views which are dominated by detracting elements.

Criteria for Determining Visual Susceptibility

9.32 In Table 10-6 further clarification is required on visual receptors for whom the nature of the view is of very low recognised importance.

Impact Magnitude

Magnitude of Landscape Impacts

9.33 (10.8.23) The reference to GLVIA should be paragraph 3.26.

9.34 (10.8.24) Duration and reversibility should also consider at what point a long-term impact or effect becomes permanent (for example after 15 years) and which impacts/effects could be considered temporary.

Magnitude of Visual Impacts

9.35 SCC considers Table 10-8 is broadly acceptable. However, the assessment of visual effects needs to go beyond assessing the selected viewpoints and their visualisations and SCC would welcome further clarification on this point.

Effect Significance

9.36 The distribution of effect significance as shown in Table 10-9 is broadly acceptable.

9.37 SCC welcomes that, where two significance categories are included in one cell, a single category will be assigned and an evidence-based reasoned judgement given for the selection of that category (10.8.30).

9.38 However, the significance threshold needs to be clarified. SCC expects that all effects that are moderate or major will automatically be considered significant. It must further be considered that an accumulation of minor effects can overall become significant.

Nighttime assessment

9.39 (10.8.31) This requires further clarification.

9.40 Firstly, SCC has concerns with regards to the sufficiency of the daytime assessment and the proposals to solely focus on publicly accessible areas (see

also paragraph (10.8.38)). This may not capture all relevant receptors. SCC considers that effects on residential amenity and on wildlife will need to be fully assessed in the ES with regards to topics such as air pollution, noise and vibration, and lighting.

9.41 Secondly, the sensitivity of receptors, which experience night-time effects, is not necessarily the same as during the day, even if they are the same receptors and the same impacts occur. This seems to be addressed in paragraph (10.8.32), but it is unclear how these two approaches are combined.

9.42 Please also see SCC's comments above with regards to paragraph (10.6.4).

9.43 (10.8.33) The assessment should also consider light spill into areas that are not meant to be lit.

Limitations and Assumptions

9.44 (10.8.38) SCC considers that residential amenity and effects on wildlife will need to be fully assessed in the ES with regards to topics such as air pollution, noise and vibration, and lighting, both during the day and during nighttime. Limiting the visual nighttime assessment to publicly accessible areas are unlikely to capture all relevant sensitive receptors that may be affected by lighting in connection with the proposals.

9.45 In addition, SCC considers that the further limitation of nighttime assessments to 1km distance of the project is only acceptable, if it can be demonstrated that no significant effects would occur beyond this distance (for example, as a result of lighting or noise and vibration).

9.46 Please refer to SCC comments above with regards to scoping out, under 10.6.

Summary of Landscape and Visual Scope (Table 10-10)

9.47 Please refer to SCC comments above with regards to study areas and scoping out.

Figures – General comments

9.48 SCC Landscape would prefer if full OS base maps (1:25,000) were to be used.

9.49 For the ES it would be helpful if the figure document titles for the document library could reference which topic area, they relate to, so that it is clear which link needs to be opened.

9.50 It is evident from reviewing the figures that the same scale does not fit all data sets. While some figures require a finer grain (such as the viewpoint maps), others would benefit from a coarser grain (such as National Landscape Character Areas).

9.51 SCC Landscape considers that some figures could be usefully merged, without overloading the content. For example, Ancient, Veteran and TPO trees could be

combined with Ancient Woodlands and Wood Pasture. SCC would be happy to engage with the Applicant in this matter.

- 9.52 SCC considers that the keys for each figure should remain consistent for all pages (rather than being tailored to the features present on a given sheet) to indicate that a certain feature would be depicted if it were present in this location.

Scoping-Report-Volume-III-Figures-Part-6-of-9.pdf,

Scoping-Report-Volume-III-Figures-Part-9-of-9.pdf

- 9.53 While the provided maps are very clear for each element (roads, lorry routes, cycle routes, PRow, etc.), it would be useful to have the various elements on an interactive map, in individual layers so that the interaction between these elements can be more readily understood.

Figure 76-1 International Sites (10km Radius) and Figure 6-2 National and Local Designated Sites (2km Radius)

- 9.54 Inset location maps require updating/correcting.

Figure 6-3 Notable Habitats Desk Study Record (500m radius)

- 9.55 The redline boundary should aim to not only avoid direct impacts on woodlands but also provide appropriate buffers and protective measures to avoid indirect impacts, as far as possible (for example, north of Burgh Road, sheet 3 of 14; in the approach to Saxmundham, sheet 13 of 14).

Figure 10 (1) Landscape Character Areas, Figure 10-2: Landscape Planning Context, Figure 10-3: Visual Receptors

- 9.56 SCC would ask that the study area be added to the Landscape Character Areas, Landscape Planning Context and Visual Receptors figures.

Figure 10-1 Landscape Character Areas

- 9.57 This figure depicts the National Landscape Areas (NCA). This should be reflected in the figure title. The scale of 1:25,000 is too 'zoomed-in' for the information provided and not very user-friendly. SCC would welcome the NCAs to be shown on a less granular scale. SCC further considers that there should be additional figures showing the Suffolk Landscape Character Assessment landscape types as well as the types and areas of the Suffolk Coastal, and Waveney District Landscape Character assessments.

Figure 10-2 Landscape Planning Context

- 9.58 Similarly, this figure would probably be more useful at a less granular scale, providing a better overview.
- 9.59 The Suffolk Heritage Coast should also be mapped.

Figure 10-3 Visual Receptors

- 9.60 It would be helpful to have the ZTV as a wash across this figure. With regards to viewpoint locations, SCC considers that a finer scale, on an OS base, should be used to aid easy location of the viewpoints. Viewing cones should be included, indicating the direction and viewing angle at each location.
- 9.61 SCC queries if there is a timeline to visit the viewpoints that were identified as inaccessible.
- 9.62 SCC considers that additional viewpoints will likely be required in areas, where above ground infrastructure is proposed (for example, around the proposed reservoirs). SCC would be happy to engage further with the Applicant to agree viewpoints, once more detailed information on above ground structures, potential visibility and mitigation measures becomes available.

Figure 11-3 Geology – Superficial and Figure 11-4 Geology – Bedrock.

- 9.63 It would be useful to have, in addition to the key, labels on the map, as the colours can be difficult to differentiate.

Figure 15-3 Designated Habitat Sites

- 9.64 The redline boundary should make every effort to avoid Veteran, Ancient and TPO Trees (for example at Spexhall, sheet 6 of 14; near Bruisyard, sheet 12 of 14)
- 9.65 Clarification is required as to whether this figure incorporates information from the Revised Ancient Woodland Inventory.

10 Agriculture and Soils

- 10.1 The risks associated with soil management are highly variable across the different areas of the project. For example, it is reasonable to expect that the impacts of rainfall and management of wet soils is likely to vary across different areas of the project. There are different types of soils within the Order Limits such as sandy soils towards the east coast and clay soils elsewhere, each of which require bespoke mitigation measures to prevent long-term impacts. Specific assessment of impacts on peaty soils is necessary and Natural England's mapping of its presence should be consulted¹⁴.
- 10.2 On some parts of the site, soils will be moved and stored for long periods of time. Elsewhere, soils storage will be much more short-term. These differences also have implications for impacts on soils and what best-practice soil management techniques are necessary for adequate mitigation. Clarity should also be provided on the applicant's approach to soil storage as best practice requires that soils

¹⁴ <https://naturalengland.blog.gov.uk/2025/05/12/a-new-peat-map-for-england/>

must be stored on site and so there must be sufficient space within the Order Limits for proper soil storage after account for constraints such as existing vegetation and presence of archaeology. Insufficient space can lead to stockpiling of topsoil too high which leads to oxygen deprivation for the living microorganisms within the soils which would nullify its ability to facilitate agricultural crops. Therefore, the applicant should demonstrate that best practice will be followed in accordance with DEFRA's guidance in the Outline Soil Management Plan¹⁵ submitted with the application.

- 10.3 The depth of the pipeline should ensure that on all soil types of agricultural land can be returned to its original use including cultivation at depth where required. The Council notes that the pipeline buried using open-cut methods will be buried at a depth of between 0.9m and 1.2m in paragraph 2.4.14. This may compromise certain agricultural activities and so burial depths should be examined and discussed with landowners to avoid this. All restoration of agricultural land should ensure that the soils are fully capable of returning to its former agricultural use and any potential future agricultural use as informed by the landowner.

11 Public Health

Methodology

- 11.1 SCC (Public Health) is not satisfied that all determinants proposed to be scoped out are supported by sufficient baseline evidence or assessment justification. Where a plausible pathway to population health, wellbeing or health inequality effects remains, SCC considers the relevant determinant should remain scoped into the assessment, representing a precautionary and comprehensive approach.
- 11.2 Whilst the Human Health methodology is broadly considered to be of an acceptable technical standard, its robustness is dependent on the adequacy of the baseline evidence, the identification of vulnerable populations, and the appropriateness of the subsequent scoping decisions.
- 11.3 At present, SCC considers the baseline evidence and the rationale underpinning a number of scoping decisions to be insufficiently evidenced, limiting confidence that potentially relevant health pathways can be discounted.

Health Baseline

- 11.4 Paragraph 18.4.2 identifies Census data, OHID profiles, the Indices of Multiple Deprivation, amongst others. These are considered appropriate core sources, and the inclusion of the Suffolk Joint Strategic Needs Assessment is welcomed.

¹⁵ <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>

11.5 It is important that the baseline is sufficiently detailed to support decisions about population sensitivity and whether individual determinants can safely be excluded. A number of notable population characteristics are absent from the baseline, which SCC consider important to understanding potential impacts. The baseline does not include:

- key elements of mental health, such as rates for diagnosed depression and severe mental illness
- substance misuse
- neurodivergent people
- physical activity among children and young people, and older people
- digital exclusion (in respect to engagement)

11.6 Furthermore, SCC consider that the baseline methodology for the ES should extend beyond the desk-based studies identified at paragraph 18.4.2 to include targeted and proportionate primary data collection. Such intelligence could both strengthen the baseline evidence and provide indicators that could be monitored throughout the phases of the project, aiding identification of changes in health determinants and informing mitigation and adaptive management. Using a contextual example of access to services and community assets, SCC consider it important to observe any measurable changes in engagement with mental health services that may be associated with project related effects, missed medical and care appointments that may be associated with traffic disruption, or reductions in the use of community and voluntary sector services. This data may provide insight into emerging wellbeing impacts, including unmet need, social isolation, or barriers to access.

Study areas and assessment guidance

11.7 Paragraph 18.2.7 explains that a 500-metre study area is to be used for pipelines and Mains sections following professional judgement and National Highways' DMRB LA 112 guidance, with a two-kilometre study area for the AWRP, LSO, CSR, and WSR.

11.8 DMRB LA 112, as recognised in the report, was designed for Highways schemes and whilst it is not considered inherently inappropriate for the proposed project, it should not be treated as establishing a universally appropriate fixed distance for a geographically extensive water infrastructure scheme.

11.9 SCC does not therefore object in principle to the proposed 500 metre and two-kilometre study areas as initial screening areas. However, these distances should not operate as firm limits. The health study area should be extended wherever relevant pathways extend further, including along construction traffic routes and diversions, affected public transport and community transport routes, PRoWs,

access routes to healthcare and social infrastructure, noise and air quality zones of influence, and areas experiencing cumulative effects from other projects.

11.10 This would avoid a situation in which a population is omitted because it is more than 500 metres from the Order Limits even though it lies on a construction traffic route or depends upon a route, facility or green space affected by the Proposed Development.

11.11 Paragraph 18.2.10 states that “the study areas will be refined throughout the evolution of the Proposed Development.” SCC accepts that refinement may be appropriate as the design and evidence base develop, however any material refinement to the study areas, particularly where it results in a reduction in the area assessed for a determinant, should be clearly justified and evidenced within the ES, including the rationale for concluding that potential health effects outside the revised study area have been appropriately considered.

Consultation, community engagement, and wellbeing

11.12 SCC have a Community Engagement and Wellbeing Supplementary Guidance Document¹⁶ that includes principles to inform engagement, assessment, and mitigation.

11.13 The Council’s guidance states that promoters should consider impacts on community wellbeing “both alone and in combination with other proposals, during all phases of the project, from the earliest stages of the pre-application period, through consenting, and during construction.” It also expects mental health, and wellbeing impacts to be assessed in the EIA and identifies effective engagement as part of safeguarding community wellbeing.

11.14 This is relevant to paragraph 18.3 and to the proposed assessment of community resilience, influence, identity, and participation. Engagement should not be treated solely as a procedural account of consultation undertaken. The ES should explain how engagement evidence has informed the identification of affected groups, pathways, design changes, mitigation, and monitoring.

11.15 The assessment should also recognise that online methods may not reach all affected residents. The baseline should inform the use of accessible, non-digital and targeted methods where communities include older people, disabled people, people with limited health literacy or households at risk of digital exclusion.

Disability, long term conditions, and local variation

11.16 Paragraphs 18.4.11 and 18.4.12 identify comparatively high levels of disability and long term physical or mental health conditions. This supports a more detailed breakdown to distinguish, between mobility limitation, sensory impairment,

¹⁶ <https://www.suffolk.gov.uk/asset-library/community-engagement-and-wellbeing-policy.pdf>

learning disability, mental health conditions, and other long-term conditions relevant to sensitivity or adaptation.

11.17 A single aggregated disability or long-term condition measure may conceal different pathways. For example, a person with limited mobility may be particularly affected by a longer or inaccessible PRow diversion, whilst a person sensitive to changes in routine or environmental stimuli may be particularly affected by unpredictable construction activity, noise, or altered access arrangements.

Mental health and wellbeing

11.18 Paragraph 18.7.3 refers to the World Health Organisation definition of health, encompassing physical health, mental health, and social wellbeing. Public Health supports that definition, but it should not be used as a substitute for identifying and assessing specific mental health pathways.

11.19 As mentioned above, the baseline omits data relating to population mental health. It will be important that the ES include and clearly identify all relevant data to inform the assessment, bringing together, rather than cross referencing separate technical chapters, the potential consequences of:

- prolonged uncertainty and loss of perceived control
- noise, vibration, artificial lighting, and sleep disturbance
- traffic, congestion, severance, and additional journey time
- temporary or prolonged restrictions on PRow and associated recreation
- reduced or disrupted access to green and blue space
- concerns about water quality, contamination, flooding, or safety
- changes to landscape, sense of place and community identity
- disruption to social interaction, participation, and support networks
- cumulative exposure to this and other major infrastructure projects
- economic uncertainty, disruption to local businesses and livelihoods, and the associated financial and psychosocial impacts on business owners, employees, and affected communities

11.20 Paragraph 18.4.76 recognises several of these pathways, we particularly welcome this.

11.21 Paragraph 18.7.8 recognises that the assessment will be primarily at population level. Population level assessment should not obscure groups whose sensitivity differs materially from the general population. Specifically, neurodivergent people should be included within the identification of potentially vulnerable groups where relevant to sensory disturbance, predictability of routine, clear communication,

accessible engagement and changes to familiar routes or environments. The purpose should be to identify proportionate and inclusive mitigation, not to assume that all neurodivergent people will experience the same effect.

11.22 SCC note that Chapter 15 (Air Quality and Odour) includes a proposed assessment of odour effects, with paragraph 15.2.11 setting out the odour study area and paragraphs 15.8.43 to 15.8.49 describing the proposed odour assessment methodology. SCC considers that odour has the potential to influence wellbeing, residential amenity and quality of life and therefore supports the applicants approach that odour effects are assessed, across construction, operation, and decommissioning. Any residual odour effects identified through the Air Quality and Odour assessment should be appropriately reflected within the Human Health assessment.

11.23 SCC considers that mental health and wellbeing should be assessed as a specific and identifiable outcome across all relevant determinants scoped into the assessment, rather than being considered implicitly through a general or holistic approach to health. The assessment should clearly explain how each relevant determinant may influence mental health and wellbeing, including effects arising from uncertainty, disruption, changes to access and amenity, community identity, social participation, recreation, economic impacts, and cumulative exposure to multiple infrastructure projects.

Health related behaviours - physical activity and access to open space

11.24 Public Health does not support the proposed exclusion of physical activity from all phases. As detailed above, physical activity among children and young people, and older people is absent from the baseline. For context, data from Suffolk JSNA¹⁷ shows that 42.5% of children and young people aged 5 to 18 meet the Chief Medical Officers' recommendations compared with 49.1% in England, highlighting sensitivity.

11.25 The construction phase presents a clear pathway through potential disruption to PROW, recreational routes, green and blue spaces, active travel opportunities, severance, loss of amenity and perceived safety.

11.26 Paragraph 18.4.34 identifies poorer accessibility to green space in parts of the health study area. Paragraph 18.4.31 additionally records that "The most common method of travel to workplace in the health study area is driving a car or van". These findings indicate potential sensitivity rather than the absence of a pathway. Greater car dependence may mean that disruption to road routes has substantial access implications, whilst it may also indicate that walking and cycling

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<https://app.powerbi.com/view?r=eyJrIjoiazTEzYzg0MWQzMTEyYi00YWZmLTg1ZGQzMGM1ZDA4NGNkMzZkliwidCI6IjEwOWM2YWVjLTUwNDYtNGE5NS04ZjNjLTg0ZjYzYmExOGFmNCJ9>

opportunities are already constrained. The question for the EIA is whether construction, diversions, severance, loss of amenity or perceived safety could reduce walking, cycling, recreation or access to the limited opportunities that do exist.

11.27 Whilst operational effects may be more limited than during construction, the Proposed Development includes permanent facilities and operational footprints that may continue to influence access, perceptions of place, landscape character, amenity, and the attractiveness of recreational environments. For example, paragraph 2.5.6 states that the AWRP is expected to operate "24 hours a day, 7 days a week". SCC therefore consider that a plausible pathway remains whereby operational activities and permanent changes to the environment could influence participation in recreation and physical activity.

11.28 Similarly, decommissioning activities have the potential to recreate many of the same pathways identified for construction, including temporary disruption to access routes, recreational spaces, and the wider public realm. Whilst the nature and duration of effects may differ, SCC do not consider it appropriate to assume at this stage that physical activity effects can be excluded from the decommissioning phase.

Health related behaviours – risk taking behaviour & diet and nutrition

11.29 There is a relationship between mental wellbeing and health related behaviours. Paragraph 18.4.76 recognises that "major infrastructure developments can influence mental health and wellbeing through changes in community resilience, perceived control and ability to influence decision making". Given this recognised pathway, SCC considers it plausible that behavioural responses may vary across individuals and communities throughout all phases of the project. In turn, psychosocial stress, disruption to daily routines and where relevant, financial pressures arising from project related circumstances may influence health related behaviours, including dietary choices and risk-taking behaviours. For example, changes in household financial circumstances may affect the affordability and accessibility of healthier food options, whilst disruption to routines and mental wellbeing may influence risk taking behaviours such as smoking and alcohol consumption. As these represent plausible pathways to population health and health inequality effects, SCC considers that risk taking behaviour and diet and nutrition should remain scoped into the assessment.

Economic determinants and balanced assessment

11.30 SCC considers that paragraphs 18.4.98 to 18.4.100 do not provide a balanced account of both beneficial and adverse pathways. Employment, apprenticeships, training, and supply chain opportunities may support health through income, financial security, skills, and self-efficacy. Conversely, congestion, additional

journey time, disruption to existing businesses, competition for labour and accommodation, or unequal access to project benefits may adversely affect wellbeing or widen inequalities. Any negative Economic impacts may be felt most acutely by small and medium sized enterprises. The assessment should therefore consider the potential health and wellbeing implications arising from both positive and negative economic effects.

11.31 SCC recognise that operational employment and income and education and training impacts are likely to be more notable during construction. However, the conclusion that these determinants can be scoped out of operational, and decommissioning is not considered warranted. Whilst the magnitude of effects may differ from the construction phase, operational activities may still generate employment, supply chain, skills, and training opportunities, whilst adverse effects on local businesses, labour availability or access to economic opportunities may also persist. Similarly, decommissioning activities have the potential to create both beneficial and adverse economic effects through temporary employment, procurement activity, business disruption, and changes in accessibility. As such, a plausible pathway to health and wellbeing effects remains beyond construction. Employment, income, training, and education are recognised determinants of health and wellbeing, and their potential influence should not be overlooked. SCC consider that these impacts should be scoped in for all phases of the project.

Social environment

11.32 Public Health accepts that community identity, culture, resilience, and influence; social participation, interaction and support pathways are likely to be strongest during pre-app and construction and that reinstated underground pipelines may have limited operational effects.

11.33 However, operation of the permanent AWRP, CSR, WSR and associated infrastructure could continue to affect landscape character, perceptions of place, amenity, trust, community safety, or perceived environmental risk. The applicant should therefore not exclude “community identity, culture, resilience and influence; social participation, interaction and support” across the operational phase.

11.34 A component specific assessment is considered appropriate. Operational pathways may be excluded for individual underground pipeline sections where land is fully reinstated and no pathway remains but should be retained for permanent above ground development and any continuing access, amenity, noise, odour, lighting, visual or risk perception effects.

11.35 A similar approach is required for decommissioning. Whilst the nature, scale and duration of effects may differ from construction, decommissioning activities have

the potential to give rise to many of the same health determinants and pathways already identified within the assessment, including effects on access, community wellbeing, participation, amenity, perceptions of place and other wider determinants of health. SCC therefore consider that these determinants should be assessed proportionately for decommissioning rather than omitted from the assessment.

11.36 SCC also note the proposal to scope out housing, community safety, and transport modes and connections during decommissioning. Whilst the rationale for excluding housing during decommissioning may be more readily understood, SCC consider that plausible pathways remain for both community safety and transport modes and connections. Decommissioning activities have the potential to generate construction type effects including temporary traffic movements, access restrictions, route diversions, and changes to perceptions of safety. Given these pathways are recognised elsewhere within the assessment, SCC do not consider their exclusion from the decommissioning phase to be sufficiently justified at this stage and recommend they remain within scope.

Institutional and built environment

11.37 Public Health does not support a complete exclusion of health and social care services and relevant built environment effects during operation and decommissioning.

11.38 Operational maintenance, emergency works, tanker and chemical deliveries, washouts and other activities could also affect routes or services, even if intermittently. Paragraph 2.5.7 identifies chemical deliveries and weekly sludge removal tanker visits, whilst paragraph 2.5.18 states that operational maintenance activities associated with the pipelines will be described and assessed in the ES. The health assessment should therefore consider whether routine or foreseeable non-routine operational activity could affect access to health, social care, or other essential infrastructure. Where the applicant concludes that no significant pathway remains for a particular component, this should be demonstrated using the operational traffic, maintenance and emergency modelling and arrangements.

11.39 Decommissioning should also remain scoped in. Paragraph 2.6.2 contemplates removal of the AWRP, CSR and WSR and paragraph 2.6.4 acknowledges that decommissioning effects may resemble construction effects. Access to essential services, emergency response capacity and temporary pressure on community infrastructure should therefore be assessed for the realistic, worst case decommissioning scenario.

12 Public Rights of Way

12.1 Suffolk County Council Public Rights of Way Team recognises the strategic importance of the proposed SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE PROJECT (SWRTS) project and notes that the preferred options remain at an early stage of development.

12.2 Given the extensive linear nature of the pipeline corridors and the proposed reservoir sites, the project has significant potential to affect Public Rights of Way, permissive routes, informal recreational access, and National Cycle Network routes during both construction and operation.

12.3 The Environmental Impact Assessment should therefore include a dedicated assessment of impacts upon public access and Public Rights of Way.

Matters that should be scoped into the EIA

Comprehensive PRow Baseline

12.4 The ES should identify and map:

- All Public Footpaths.
- Public Bridleways.
- Restricted Byways.
- Byways Open to All Traffic.
- National Cycle Network routes.
- Permissive paths.
- Open access land where relevant.
- Long-distance recreational routes affected by the scheme.

12.5 This should cover both direct land take and adjacent routes potentially affected by construction activities.

Construction Effects

12.6 The project documentation specifically references crossings of Public Rights of Way on several corridors.

12.7 The EIA should assess:

- Temporary closures.
- Diversions.
- Restrictions on access.
- Severance effects.
- Loss of connectivity.

- Construction traffic impacts on users.
- Safety implications at crossing points.
- Impacts arising from trenchless crossing compounds.
- Compound placement adjacent to PRow.

Public Access Around Reservoir Sites

12.8 The proposed Central Service Reservoir and Western Service Reservoir locations may affect existing rights of way and recreational users during construction and operation.

12.9 The assessment should consider:

- Existing PRow connectivity.
- Construction access routes crossing or sharing PRow.
- Temporary and permanent effects on recreational use.
- Opportunities to retain access during construction.
- Opportunities to create and enhance the PRow network.

National Cycle Network

12.10 The document identifies crossings of National Cycle Network routes.

12.11 The EIA should assess:

- Construction disruption.
- User safety.
- Temporary route diversions.
- Duration of impacts.
- Quality and accessibility of any alternative routes.

User Experience and Amenity

12.12 The assessment should extend beyond legal route availability and consider:

- Noise.
- Dust.
- Visual intrusion.
- Construction compounds.
- Plant and machinery movements.
- Temporary fencing.

- Lighting.

12.13 These can materially affect enjoyment and usability even where routes remain open. The British Horse Society has good guidance on construction near to Bridleways and horses. <https://www.bhs.org.uk/media/e0jd440c/construction-0626.pdf>

Accessibility

12.14 Any temporary diversions should:

- Be available before closures occur.
- Be safe and convenient.
- Be accessible for users with mobility impairments where reasonably practicable.
- Maintain continuity for equestrians and cyclists where existing rights permit.
- Be at least commensurate with the existing use or better.

Cumulative Effects

12.15 Particular attention should be given to cumulative impacts arising from other major infrastructure projects referenced in the document including, but not limited to:

- Sizewell C.
- LionLink.
- EcoPower Suffolk Solar.
- Chediston Solar Farm.
- North of Lowestoft Garden Village.

12.16 The cumulative effect of multiple schemes on the recreational network and countryside access should be assessed.

Opportunities for Enhancement

12.17 The PRoW Team would encourage the applicant to identify opportunities for:

- Permanent route improvements.
- Surface upgrades.
- Improved accessibility.
- Additional links to address existing severance.
- New multi-user routes where practical.
- Green infrastructure integration around reservoir sites.

12.18 Given the scale of the project and its widespread footprint, opportunities for enhancement should be considered as part of the project's legacy.

Site specific comments for preferred sites and pipeline corridors

Advanced Water Recycling Plant

- 3.2 – Lound Footpath 006 and 007 runs around and through the site.
- 3.3 In Norfolk and so SCC will not comment.

Central Service Reservoir

- 3 - Walpole Footpath 016 runs to the north of the proposed site.
- 4 – Sibton Bridleway 006 runs on the eastern boundary with Walpole Footpath 016 runs to the north of the proposed site.

Western Service Reservoir

- 9 – Brome footpaths 008 and 010 are in close proximity to the location of the proposed reservoir.

Advanced Water Recycling Plant to River Waveney (A-W) Pipeline Corridor

- A-W3 aka Pipeline Corridor 3 crosses many PRoWs and promoted trails some long distance. <https://www.discoversuffolk.org.uk/explore-suffolk/> <https://www.discoversuffolk.org.uk/promoted-trails/angles-way/>
- <https://eastsuffolklines.co.uk/walks>
- For example: The Angles Way, Waveney Valley Walks and East Suffolk Lines.

Specific Information Request

12.19 The PRoW Team requests that future consultation and EIA submissions include:

- A. A Rights of Way Constraints Plan.
- B. A Schedule of all affected PRoW.
- C. Details of proposed crossings.
- D. Temporary Closure and Diversion Strategy.
- E. Construction Traffic Management information relating to PRoW users.
- F. Public Access Management Plan.
- G. Assessment of cumulative recreational impacts.
- H. Details of proposed access enhancements and legacy benefits.

Recommended Conclusion

12.20 Suffolk County Council Public Rights of Way Team raises no objection in principle to the scheme at EIA Scoping stage. However, given the extensive linear nature of

the works and the number of Public Rights of Way and recreational routes likely to be affected, the Environmental Statement should include a dedicated Public Rights of Way, Access, and Recreation assessment. This should assess direct, indirect, temporary, permanent, and cumulative impacts on the rights of way network and set out appropriate mitigation, diversion, management, and enhancement measures to ensure that public access is maintained and improved wherever possible.

13 Cumulative effects

- 13.1 The Council is concerned with the proposed search area and criteria for cumulative developments. The criteria for cumulative developments given in paragraph 23.4.4 of a 5km Zone of Influence area (Zol) from the proposed Order Limits appears arbitrary, lacks justification and does not reflect the identified zone of influences for impacts as divided by impact area. For instance, table 23-2 identifies that impacts may be felt within 10km of the Order Limits. Moreover, traffic and transport impacts will diffuse across the local road network and strategic road network, which is already being impacted by cumulative developments, and so cumulative impacts may extend beyond the proposed Zol.
- 13.2 The other criteria from paragraph 23.4.4 appears problematic; namely, only development >50 units and 10,000m² of commercial floor space are considered. This does not reflect the rural nature of the location of the project, where substantial agricultural development is commonplace and may contribute to cumulative impacts. Such development can cause substantial movements of agricultural vehicles and so should be considered. The Council understands that the relevant district councils would be able to provide this information and their respective planning portals should be consulted to consider what development of this nature should be included in the cumulative effects assessment. Minerals and waste developments are also not covered by these criteria but also require consideration in the cumulative effects assessment.