

SEA LINK

EN0200026

Response to Consultation on Proposed Changes to the Sea Link Development Consent Order

Contents

1	Introduction.....	3
2	Proposed Changes to the Sea Link Development Consent Order (DCO).....	3
3	Change 2 – Change to Works Plans at Friston (Kiln Lane) Substation, Suffolk.....	4
4	Change 3 – The Henge, Suffolk	5
5	Change 4 – Benhall Railway Bridge (B1121), Suffolk.....	7
6	Change 5 – Increase in Area for Maintenance of a New Hedge to South of B1119, Suffolk.....	10
	Appendix A – Detailed Technical Comments	12
7	Archaeology.....	12
8	Ecology.....	13
9	Highways	14
10	Landscape	15
11	Local Lead Flood Authority (LLFA).....	16
12	Public Health	16
13	Public Rights of Way (PRoW)	17

Glossary of Acronyms

<i>DCO</i>	<i>Development Consent Order</i>
<i>ES</i>	<i>Environmental Statement</i>
<i>HVAC</i>	<i>High Voltage Alternating Current</i>
<i>HVDC</i>	<i>High Voltage Direct Current</i>
<i>LHA</i>	<i>Local Highways Authority</i>
<i>NSIP</i>	<i>Nationally Significant Infrastructure Project</i>
<i>PIS</i>	<i>Preservation In Situ</i>
<i>PPA</i>	<i>Planning Performance Agreement</i>
<i>SCCAS</i>	<i>Suffolk County Council Archaeological Service</i>
<i>SPR</i>	<i>Scottish Power Renewables</i>

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

Purpose of this Document

The document has been prepared by Suffolk County Council to respond to the consultation on the proposed changes to the Sea Link Development Consent Order with a deadline of 7 November 2025.

1 Introduction

- 1.1 The Sea Link proposals consist of the construction of a 2 Gigawatt (GW) High Voltage Direct Current (HVDC) undersea electricity link between Suffolk and Kent which will connect to Kiln Lane substation in Friston, which has consent via an existing Development Consent Order (DCO) obtained by a third party, Scottish Power Renewables (SPR), but as yet is unbuilt.
- 1.2 The offshore scheme consists of a 122 kilometre (km) subsea cable which will run between a Suffolk landfall location between Aldeburgh and Thorpeness and the Kent landfall at Pegwell Bay.
- 1.3 The onshore scheme consists of the installation of a High Voltage Alternating Current (HVAC) 1.9km underground cable between Kiln Lane substation in Friston, a 2GW HVDC converter station near the town of Saxmundham up to 26 metres (m) in height, and a 10km HVDC underground cable between the converter station and transition joint bay approximately 900m from shore, which will enable the transition from offshore to onshore technology.

2 Proposed Changes to the Sea Link Development Consent Order (DCO)

- 2.1 The applicant has proposed the following changes to the Sea Link Development Consent Order: -
 - Change 1 – Change to access at the Hoverport, Kent
 - Change 2 – Change to Works Plans at Friston (Kiln Lane) substation, Suffolk
 - Change 3 – The Henge, Suffolk
 - Change 4 – Benhall Railway Bridge, Suffolk
 - Change 5 – Increase in area for maintenance for a new hedge to the south of B1119, Suffolk
- 2.2 This response will only focus on those proposed changes (2-5) which are relevant to the Suffolk locations in the DCO.
- 2.3 The response will detail each proposed change with a summary of the respective comments from the relevant technical service areas, full comments of which can be found in Appendix A.

3 Change 2 – Change to Works Plans at Friston (Kiln Lane) Substation, Suffolk

- 3.1 The applicant has proposed a change to the works area for the consented Kiln Lane substation in Friston to match the area which was already approved for two Scottish Power Renewables (SPR) wind farm projects, East Anglia ONE (North) and East Anglia TWO (EA1N/2).

General Comments

- 3.2 The Council wishes to draw to the attention of National Grid, that the Friston substation also appears on the TEC Register as ‘South East Anglia Connection Node E’ and as such has three connection offers associated with it, including two solar battery projects of 400MW and 600MW respectively.
- 3.3 These projects have proposed connection dates after 2030 and as such will receive confirmation of their Gate 2 offer (or otherwise) no later than the end of Q3, 2026, in accordance with the National Energy System Operator¹.

Archaeology

- 3.4 Suffolk County Council Archaeology Service (SCCAS) has no objection to the proposed changes to the limits of deviation within the Kiln Lane (Friston) substation site.
- 3.5 Construction activity will need to avoid areas of archaeological mitigation which have been defined as Preservation in Situ (PIS) areas of the EA1N/2 project and therefore not be subject to excavations as part of the Sea Link scheme.
- 3.6 If any ground disturbance is planned within the PIS areas by Sea Link, a programme of archaeological excavation will need to be undertaken.
- 3.7 Vehicle movements and materials and spoil will also need to take the archaeological PIS areas into account.

Ecology

- 3.8 The Council considers that the change to work plans does not create any additional potential impacts on ecological features which were assessed in the Environmental Statement.

Landscape

- 3.9 The Council has concerns that the final location of the substation could result in additional vegetation loss. If the substation were to be moved further north-east, a longer stretch of hedgerow would be affected and if it were moved further south-west, this would require less removal.

¹ <https://www.neso.energy/industry-information/connections-reform/connections-reform-timeline>

- 3.10 Any additional vegetation loss will need to be documented and mitigated or compensated as required.
- 3.11 The impacts of the degree of flexibility and subsequent uncertainty with regards to mitigate planting required as part of the delivery of other projects need to be fully assessed.

Local Lead Flood Authority

- 3.12 The LLFA acknowledges the change to the works area for the consented Kiln Lane substation in Friston to match the area which was already approved for two Scottish Power Renewables (SPR) wind farm projects, East Anglia ONE (North) and East Anglia TWO (EA1N/2), however concerns remain over a lack of coordination over the drainage strategy for the substation site.
- 3.13 The LLFA strongly advises that the Sea Link and SPR project teams to engage directly and share relevant ground investigation data, including infiltration results.
- 3.14 A coordinated approach would enable the development of a unified drainage strategy that is technically robust and publicly coherent.
- 3.15 The LLFA remains concerned that divergent approaches will lead to confusion and uncase within the Friston community, therefore the LLFA urges the Sea Link team to prioritise alignment with SPR wherever possible, through either collaboration or through equivalent investigation to support a coordinated approach.

4 Change 3 – The Henge, Suffolk

- 4.1 The applicant has proposed to adjust the boundaries of the project to avoid and protect a Heritage asset, identified in the consultation as a Neolithic Henge, which was found during archaeological survey works in July 2025.
- 4.2 The change will move the planned underground cable route, including a 30m buffer zone to avoid the Neolithic Henge site.
- 4.3 To maintain flexibility regarding the rerouting of the underground cable, the applicant proposes including additional land within their Order Limits which will allow the new route to either go north or south of the Neolithic Henge.
- 4.4 The Council's response to Change 3 is detailed by service area below.

Archaeology

- 4.5 Further to the completion of further geophysical work, the interpretation of the site has now changed and is no longer thought to be a hengiform monument.
- 4.6 Based on the evidence including the form and finds, it is believed that the site to be a later Bronze Age D-shaped enclosure.

- 4.7 Following advice from Natural England, it is no longer believed that the site meets the criteria of a schedulable monument and therefore SCCAS would no longer advise to avoid the site entirely to achieve preservation in situ, therefore mitigation through excavation would now be acceptable.
- 4.8 However, given the potential of the site to contain settlement evidence and other remains, SCCAS would advise only partial excavation of just the central portion of the feature would not be appropriate or in line with best practice. Therefore, the monument would need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if it is not going to be completely avoided by the cable route.
- 4.9 It is noted that the current order limits do not allow for this (and nor does the proposed change to the order limits in Change 3) and therefore SCCAS would advise the need of a slight expansion of the order limits around the monument to accommodate full excavation of the enclosure and any associated internal and external remains. This would only need to be a localised expansion and would remove the requirement for further assessment at this stage.

Ecology

- 4.10 The Council confirms no further ecological matters arise from this proposed change.

Landscape

- 4.11 The Council supports change in principle, however, there is a risk that additional roadside trees could be lost as well as some field boundary hedgerow.
- 4.12 Any additional vegetation losses will need to be documented and mitigated or compensated as required.

Public Health

- 4.13 The proposed extension of the order limits may result in works being located closer to residential receptors, including Bulls Farm. Although it is acknowledged in the Change Application Consultation Document, it is important that the potential health implications for these receptors are fully considered and addressed.
- 4.14 The Council recommends that further detail is provided and assessed regarding the possible health impacts associated with the proposed works. Specifically, the applicant should clarify the potential effects of noise, vibration and air quality on nearby residents and workers of the works required to install the underground cabling.

- 4.15 It is also advised that the applicant outlines the mitigation measures that will be implemented to minimise any adverse impacts, referencing best practice standards and relevant guidance.

5 Change 4 – Benhall Railway Bridge (B1121), Suffolk

- 5.1 The applicant has proposed to add additional land to their Order Limits around the Benhall Railway Bridge on the B1121. The land includes areas along the road, the bridge itself, nearby areas to the east of the bridge and a small section along the railway.
- 5.2 The change has been put forward to allow flexibility when considering options to transport large equipment to the new converter station.
- 5.3 This change has been the result of discussions with Suffolk County Council and East Suffolk Council due to the importance of the Benhall Railway Bridge as part of the access route to the converter station site and the need for clarity on how any works to the bridge would be consulted and consented upon by the Local Highways Authority (LHA).
- 5.4 The Council's response to Change 4 is detailed by service area below.

General Comments

- 5.5 The Council notes that the additional land identified for the extended order limits includes areas earmarked for development under Outline Planning Application DC/21/2503/OUT. The Council understands that Outline Planning Permission has now been granted for this application. In addition, the extended order limits will bring works areas closer to existing residential development, both at Shotts Meadow and at the Whitearch Residential Park. Although this is principally a matter for the district, East Suffolk Council, the Council considers this issue still needs to be acknowledged in this response.
- 5.6 The Council also continues to have concerns about the feasibility and acceptability of using the B1121 and in particular the Benhall Bridge as an access route for construction traffic (in particular AIL movements). If an acceptable solution cannot be identified, the applicant will be unable to construct the project. Consequently, the Council urges the applicant to consider (in addition to or as alternatives to Change 4) further changes to the project (including potentially increasing the Order limits elsewhere) in order that an alternative construction access route is available should the route via the B1121 not be deliverable. Such an alternative route could utilise, in part, the proposed Sizewell Link Road to provide access to the converter station site from the north (instead of via the B1121 from the south).
- 5.7 The option of constructing a new bridge should also be explored by the Applicant and provision should be considered in the revision of the Order

Limits to allow for this option should it be required. It is possible that constructing a new bridge may be more feasible than repairing the existing bridge and a more resilient solution than temporary overbridging when considering the need of Lion Link and any future projects requiring access to the converter station site.

- 5.8 The Council cannot comment at this stage on the feasibility of any options for bridge repair or replacement on account of a lack of detail. Likewise, the Council considers that the potential adverse impacts of overbridging have not been satisfactorily assessed.
- 5.9 The Council has provided information on the structure for review by the Applicant. Further investigation of the structure is likely to be required including physical examination and testing. This would then inform a review of the condition and load capacity of the structure. This process will require approval in principle by the Council.
- 5.10 The environmental impacts of any works, including investigations into the condition of the bridge, will need to be sufficiently assessed.

Archaeology

- 5.11 SCCAS has no objection to the proposed changes to the order limits, however any new scheme areas will need to subject to a programme of archaeological assessment, in this instance trial trenched evaluation, followed by mitigation as appropriate, prior to any pre-commencement or construction works.

Ecology

- 5.12 The Council has concerns regarding the proposed change due to the potential impacts on bats, birds and badgers that could result from any works from the additional land included within the order limits.
- 5.13 It is essential that new areas of habitat which will be impacted by the works are assessed for bird, bat and badger interest and appropriate mitigation measures drafted.
- 5.14 The proposed works should also be assessed in terms of their potential impacts on the nearby Benhall Green Meadows County Wildlife Site, which is designated for its marsh grassland habitat.

Highways

- 5.15 The Council does not agree with the statement at para 4.5.5 of the Consultation Document that it asked for the inclusion of the additional land - In discussions with the applicant, the Council expressed concern that the Order limits did not include the Benhall Bridge notwithstanding that the applicant envisaged some works to the Bridge may be necessary, and the Council recognised that additional land would likely to be needed to strengthen or provide the

temporary improvements required to allow loads greater than 46 tonnes to traverse Benhall Rail Bridge, but this was not a recommendation, and Suffolk County Council did not request for the additional land to be included in the DCO.

5.16 If works are proposed at the Benhall Bridge, the Council concurs that the Order limits would need to be extended to include the necessary land, but it does have concerns as to whether suitable works to improve the Bridge are feasible within the revised Order limits as currently proposed.

5.17 4.5.6 - The Council has raised concerns for each option presented related to: -

- delays or disruption to public and contractor's traffic on B1119
- the geometry of the site, making implementation of a solution challenging with respect to the length of any temporary structure, due to the skew of the bridge
- traffic management, such as temporary traffic signals, causing potential backups onto the A12
- maintaining safe access for non-motorised users
- access to Whitearch Residential Park
- access to public utilities for maintenance
- impact of delays due to diverted traffic, emergency services and impacts on communities situated on diversion routes

5.18 4.5.8 - If the bridge is to revert to its existing state, no loads greater than 46 tonnes would be able to access the Fromus River Bridge and the converter station site during the operational phase. Consideration must be given to projects such as LionLink where if developers were to also use this route, the impact would be greater and still not offer a permanent solution.

5.19 The Council has yet to receive an environmental assessment or traffic study to evaluate potential impacts.

5.20 4.5.12 – The Council considers that all potential solutions proposed by the Applicant will increase the volume of construction traffic, although without the necessary information, the Council cannot determine how significant impacts could be. Abnormal loads such as cranes will need to access the site via Saxmundham otherwise a temporary bridge would be needed to cross the bridge to construct the temporary solution.

5.21 The Council is unclear how the developer proposes to access the land to the south of the B1121. The proposed access forming part of the DC/21/2503/OUT application would not be acceptable noting the highway authorities comment on suitability for residential traffic. Consideration must

be given to achieving suitable visibility noting the crest on the bridge to the south and the no overtaking road markings for southbound traffic.

Landscape

- 5.22 Any additional vegetation losses, including along the railway line will need to be documented and mitigated or compensated as required.

Public Health

- 5.23 There is potential for health impacts affecting current and future residential receptors during the bridge works due to the close proximity of the proposed extension order limits to existing dwellings, residential park homes as well as sites referenced in current planning applications. Residential park homes are particularly vulnerable to the impacts of noise, vibration and dust given the nature of their construction.
- 5.24 The Council recommends that further detail regarding the type, duration and timing of works is provided to affected residential receptors and stakeholders and that appropriate mitigation measures are identified and implemented.
- 5.25 The potential temporary closure and diversion of a Public Right of Way may impact health and wellbeing particularly for those who rely on these routes for daily exercise, commuting or recreation. The Council advises that robust mitigations are in place to minimise disruption.

Public Rights of Way (PRoW)

- 5.26 4.5.11 - The Council raises concerns about the impact on the Benhall Footpath 26 (PRoW E-137/026/0) and 34 (PRoW E-137/034/0) during the construction, operation, and decommissioning of any temporary bridge. More detailed assessment and information is required before detailed comment can be made.

6 Change 5 – Increase in Area for Maintenance of a New Hedge to South of B1119, Suffolk

- 6.1 The applicant has proposed to widen a strip of land to the south of the B1119, near Fristonmoor Lane to allow more space to plant the proposed new hedge and the ditch. The proposal includes changing the type of access rights to this area to allow long term maintenance of the drain from the field.
- 6.2 The new hedge is part of landscape and visual mitigation to screen views of the converter station from the north/northeast and help reinstate historic hedgerow planting.
- 6.3 The Council's response to Change 4 is detailed by service area below.

Archaeology

- 6.4 SCCAS have no objection to the planting of the proposed hedgerow at the converter station site, however, no ground disturbance should take place within areas defined as requiring archaeological mitigation as part of the proposed Lion Link scheme, during associated works, prior to the completion of mitigation work as part of the Sea Link project.

Highways

- 6.5 Planting of the proposed hedge adjacent to the B1119 should not adversely impact forward visibility for traffic using this road.

Landscape

- 6.6 The Council is unpersuaded that this change goes far enough and proposes that along the B119, a sufficient corridor should be established to allow space for the hedge and a generous route corridor for a public right of way.
- 6.7 More detailed information is required regarding landscape, visual effects and vegetation loss before detailed comments can be provided.

Public Rights of Way (PRoW)

- 6.8 The Council is unpersuaded that this change goes far enough and proposes that along the B119, a sufficient corridor should be established to allow space for the hedge, watercourse, and a generous route corridor for a public right of way.

Appendix A – Detailed Technical Comments

7 Archaeology

Change 2

- 7.1 Suffolk County Council Archaeological Service (SCCAS) have no objection to the proposed changes to the limits of deviation within the Friston substation site.
- 7.2 Any construction activity will need to avoid areas of archaeological mitigation which have been defined as Preservation in Situ (PIS) areas as part of the EA1N/2 project and have therefore not been subject to excavation as part of this scheme (a document is in production which sets out the safeguards and requirements for these areas). Should any works involving ground disturbance be planned within these PIS areas as part of the SEA Link project then SEA Link will need to undertake a programme of archaeological excavation. Vehicle movements and spoil and materials storage etc will also need to take archaeological PIS areas and their associated restrictions into account.

Change 3: The Henge Site

- 7.3 Further to the completion of additional geophysical survey work, the interpretation of this monument has now changed and is no longer thought to be a hengiform monument. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore we would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable. However, given the potential to contain settlement evidence and other remains, we would advise that a partial excavation of just the central portion of this feature would not be appropriate or in line with best practice and this monument would therefore need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route. The original order limits would not allow for this and therefore we would advise the need for a slight expansion of the scheme order limits around this monument to facilitate full excavation of the enclosure and any associated internal and external remains. This would, however, only need to be a fairly localised expansion and remove the need for further assessment work at this stage.
- 7.4 If the applicant decides that they still wish to avoid this monument entirely to remove the need for excavation, we do not object to the proposed expansion of the order limits which has been proposed in the recent additional submission. We are pleased that geophysical survey has now been completed for these new

areas, however, further anomalies of likely archaeological interest have been defined, along with the potential for further unknown archaeological remains which have not been able to be detected. As such, any changes to the route beyond a small increase around the D-Shaped enclosure, would require a programme of trial trenched archaeological evaluation prior to the determination of the DCO, in order for the nature, extent and significance of any archaeological remains to be defined and to allow appropriate mitigation strategies to be determined and also informed design and planning decisions to be made.

Change 4 - Benhall Railway Bridge

- 7.5 SCCAS have no objection to the proposed changes to the order limits at Benhall, however, any new additional scheme areas will need to be subject to a scheme of archaeological assessment (in this instance trial trenched evaluation), followed by mitigation as appropriate, prior to any pre-commencement or construction works.

Change 5 - Increase in maintenance of a new hedge to south of B1119, Suffolk

- 7.6 SCCAS have no objection to the planting of the proposed hedgerow at the Saxmundham converter station site, however, no ground disturbance should take place within areas defined as requiring archaeological mitigation as part of the Lion Link scheme during associated works, prior to the completion of mitigation work as part of this project.

8 Ecology

Change 4 – Benhall Railway Bridge

- 8.1 The Council is concerned about this proposed change in terms of the potential impacts on bats, birds and badgers that may result from any works in this area. It is essential these new areas of habitat that will be impacted by the works are assessed for their bird, bat and badger interest and appropriate mitigation measures drawn up if required. The proposed works should also be assessed in terms of their potential impacts on the nearby Benhall Green Meadows County Wildlife Site, which is designated for its marsh grassland habitat.
- 8.2 Have the hedges earmarked to be removed been assessed in terms of the Hedgerow Regulations and possible bat migration routes? When would the proposed hedges be removed – this should be timed to avoid potential impacts on nesting birds. Should there be a new bridge built at this location, this construction needs to be assessed in terms of potential impacts on any bats that are/will be using the railway line as a migration corridor.
- 8.3 Maintenance of the new hedge: more land for the hedge and ditch are welcomed. Gives space for the new hedge to develop and areas of habitat such

as neutral grassland or scrub could be allowed to develop, enhancing the wildlife value of this area.

9 Highways

Change 4 – Benhall Railway Bridge

9.1 4.5.6 Very limited details for these options have been provided. SCC has raised concerns for each option such as:

- Delays or disruption to public and the contractor's traffic on the B1119,
- the geometry of the site making implementation of a solution challenging particularly with respect to the length of any temporary structure due to the skew of the bridge,
- traffic management, such as temporary traffic signals, causing backups onto A12 due to the bridge's proximity to the junction of B1121/A12,
- safety of and access for non-motorised users,
- access to Whitearch Residential Park,
- access to public utilities for maintenance
- impact of delays due to diverted traffic, emergency services and impacts on communities along diversion routes.
- impact on Benhall Footpath 26 both during construction and operation of any temporary bridge and also

9.2 4.5.8 If work is temporary the bridge will revert to its existing state and therefore no loads greater than 46 tonnes could access the Fromus River Bridge and hence the convertor station site from this direction during the operational phase. If any other project, for example LionLink were to also use this route the impacts would be greater, over a longer period and still not result in a permanent solution.

9.3 4.5.10 SCC has yet to receive any environmental assessment or traffic study to comment on the severity or otherwise of the impacts.

9.4 4.5.12 All potential solutions will increase the volume of construction traffic, albeit without information SCC cannot say whether in our view it is significant. At least some abnormal loads such as cranes will need to access the site via Saxmundham as if greater than 46 tonnes, for example cranes, they would otherwise need a temporary bridge to get across the bridge to build the temporary bridge.

9.5 It is unclear how the developer proposes to access the land to the south of the B1121. The proposed access forming part of the DC/21/2503/OUT application would not be acceptable noting the highway authorities comment on suitability

for residential traffic. Consideration must be given to achieving suitable visibility noting the crest on the bridge to the south and the no overtaking road markings for southbound traffic.

10 Landscape

Change 2 – Changes to Works Plans at consented but unbuilt Kiln Lane (Friston) substation

- 10.1 Depending on where the substation will be finally located this could result in additional vegetation loss, as the boundary hedge to the north of the site is not parallel to the existing powerline. So, if the substation were to be moved further north-east, a longer stretch of hedgerow would be affected. If the substation were to be moved further south-west this would require less hedge to be removed.
- 10.2 Any additional vegetation losses will need to be documented and mitigated or compensated as required.
- 10.3 The desired degree of flexibility could also create greater uncertainty with regards to mitigative planting required as part of the delivery of other projects. The impacts and effects on this need to be fully assessed and explained.

Change 3 – Avoidance of the Henge Site

- 10.4 SCC (Landscape) supports this change in principle. However, there is a risk that additional roadside trees could be lost, as well as some field boundary hedgerow.
- 10.5 Any additional vegetation losses will need to be documented and mitigated or compensated as required.

Change 4 – Benhall Railway Bridge

- 10.6 Any additional vegetation losses, including along the railway line, will need to be documented and mitigated or compensated as required.

Change 5 – Increase in maintenance of a new hedge to south of B1119, Suffolk

- 10.7 SCC (Landscape) is unpersuaded that this change does go far enough and considers that along the B1119, a sufficiently wide corridor should be established to allow space for the hedge and a generous route corridor for a public right of way, to improve access to the countryside and provide a connection with other PRow in the area, as benefit to the local communities.
- 10.8 In summary, SCC (Landscape) considers that more detailed information is required with regards to landscape and visual effects and vegetation loss, before detailed comments can be provided.

- 10.9 These comments are therefore provided without prejudice to any comments that may be made once greater detail for proposals in these areas becomes available.

11 Local Lead Flood Authority (LLFA)

Change 2 – Changes to Works Plans at consented but unbuilt Kiln Lane (Friston) substation

- 11.1 The LLFA acknowledges the change to the works area for the consented Kiln Lane substation in Friston to match the area which was already approved for two Scottish Power Renewables (SPR) wind farm projects, East Anglia ONE (North) and East Anglia TWO (EA1N/2), however concerns remain over a lack of coordination over the drainage strategy for the substation site.
- 11.2 The LLFA strongly advises that the Sea Link and SPR project teams to engage directly and share relevant ground investigation data, including infiltration results.
- 11.3 A coordinated approach would enable the development of a unified drainage strategy that is technically robust and publicly coherent.
- 11.4 The LLFA remains concerned that divergent approaches will lead to confusion and uncase within the Friston community, therefore the LLFA urges the Sea Link team to prioritise alignment with SPR wherever possible, through either collaboration or through equivalent investigation to support a coordinated approach.

12 Public Health

Change 3 - The Henge Site

- 12.1 The proposed extension of the order limits may result in works being located closer to residential receptors, notably Bulls Farm. Whilst Section 4.4.7 of the Change Application Consultation Document acknowledges that the revised cable route could bring construction activities nearer to certain residences, it is important that the potential health implications for these receptors are fully considered and addressed.
- 12.2 Public Health recommends that further detail is provided and assessed regarding the possible health impacts associated with the proposed works. Specifically, the applicant should clarify the work required to install the underground cabling, duration, and timing of construction activities within the newly included areas and provide a thorough assessment of potential effects on noise, vibration, and air quality for nearby residents and workers.
- 12.3 It is also advised that the applicant outlines the mitigation measures that will be implemented to minimise any adverse impacts, referencing best practice

standards and relevant guidance. This should include clear commitments to monitoring and managing environmental factors throughout the construction period, with particular attention to those receptors now situated closer to the works as a result of the change.

Change 4 - Benhall Railway Bridge, Suffolk

- 12.4 The proposed extension of the order limits around Benhall Railway Bridge is situated in close proximity to what appear to be existing dwellings and residential park homes, as well as sites referenced in current planning applications. Should the promoter be permitted to utilise some or all of the additional area, there is potential for health impacts affecting both current and future residential receptors during the indicated bridge works.
- 12.5 Whilst Section 4.5.10 states that no significant archaeological or long-term environmental effects are expected, and that construction noise impacts are anticipated to be mitigated through best practicable means, Public Health recommends that further detail is provided regarding the type, duration, and timing of works in the newly included areas as soon as possible to affected nearby residential receptors and stakeholders and that appropriate mitigation measures are identified and implemented. This should include a comprehensive assessment of potential health impacts on nearby residential receptors and those associated with planning applications, specifically in relation to noise, vibration, air quality, and access.
- 12.6 Additionally, Section 4.5.11 notes the potential temporary closure and diversion of a Public Right of Way. Temporary closures or diversions may impact health and wellbeing, particularly for those who rely on these routes for daily exercise, commuting, or recreation. Public Health therefore advises that the promoter ensures robust mitigation is in place to minimise disruption, maintain safe and convenient access for all users, and actively consider the potential health impacts arising from any loss or alteration of access during the construction period.

13 Public Rights of Way (PRoW)

Change 4 – Benhall Railway Bridge, Suffolk

- 13.1 4.5.11 SCC (PRoW) would also raise concerns about the impact on Benhall Footpath 26 (Public Right of Way E-137/026/0) and Benhall Footpath 034 (Public Right of Way E-137/034/0) During construction/ decommissioning and operating of any temporary bridge. More detailed information and assessment with regards to PRoW is required before detailed comments can be made.

Change 5 – Increase in maintenance of a new hedge to south of B1119, Suffolk

13.2 SCC (PRoW) is unpersuaded that this change goes go far enough with consideration that along the B1119, a sufficiently wide corridor should be established to allow space for the hedge, watercourse and a generous route corridor for a public right of way to improve access to the countryside and provide a connection with other PRoWs in the area and as benefit to the local communities.

These comments are therefore provided without prejudice to any comments that may be made once greater detail for proposals in these areas becomes available.