Suffolk County Council

Suffolk Water Recycling, Transfer and Storage (SWRTS) Project

Non-Statutory Consultation

Suffolk County Council

December 2025

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Glossary of Acronyms

DCO	*Development Consent Order*
ES	*Environmental Statement*
NSIP	*Nationally Significant Infrastructure Project*
PPA	*Planning Performance Agreement*

"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 Non-Statutory Consultation for Suffolk Water Recycling, Transfer and Storage (SWRTS) Project occurring between 29 October and 17 December 2025.

1 Introduction

1.1 Suffolk Water Recycling, Transfer and Storage is a Nationally Significant Infrastructure Project (NSIP) developed by Essex and Suffolk Water (part of Northumbrian Water), to construct an Advanced Water Recycling Plant and strategic network enhancements.

1.2 The scheme is proposed to be located in North Suffolk.

1.3 In summary the project consists of:

- An Advanced Water Recycling Plant (AWRP) with a maximum daily deployable output of 11 Ml/d [million litres per day]. 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.
- Construction of a new pumping station and potential minor modifications to the existing works at the Lowestoft WRC, to divert treated wastewater to the AWRP.
- Two proposed Service Reservoirs (SRs) for storage of drinking water, located at strategic locations for onward supply and storage. The two SRs are to be sized to provide 36 hours of storage. The central SR will have a capacity of approximately 17ML and the western SR will be approximately 13ML. It is likely the SRs will require a construction site size of approximately 4ha each.

1.4 The applicant has proposed multiple options for the locations for the land parcels and pipeline corridors that form the above aspects of the project:

Advanced Water Recycling Plant (AWRP)

- **AWRP 3.1** – Land parcel approximately 1.2km northwest to the Lowestoft Water Recycling Centre.
- **AWRP 3.2** – Land parcel approximately 1.5km northwest of the Lowestoft Water Recycling Centre.
- **AWRP 3.3** – Land parcel approximately 2.2km northwest of the Lowestoft Water Recycling Centre.
- **AWRP 5.5** – Land parcel not in Suffolk.

Central Service Reservoir (CSR)

- **CSR 1** – Land parcel approximately 25m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 2** - Land parcel approximately 610m east of the Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.

- **CSR 3** – Land parcel approximately 630m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 4** – Land parcel approximately 200m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 5** – Land parcel approximately 80m south-east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 6** – Land parcel approximately 310m south of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 7** – Land parcel approximately 500m south of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 8** – Land parcel approximately 365m south of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 11** – Land parcel approximately 340m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest.
- **CSR 12** – Land parcel approximately 210m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest
- **CSR 13** – Land parcel approximately 25m east of Heveningham Hall Registered Park and Garden of Historic or Landscape Interest

Western Service Reservoir (WSR)

- **WSR 1** – Land parcel approximately 10 hectares in size to the east of Thrandeston.
- **WSR 2** – Land parcel approximately 3.5 hectares in size immediately south-east of Thrandeston.
- **WSR 3** – Land parcel approximately 7 hectares in size approximately 350m south of Thrandeston.
- **WSR 4** – Land parcel approximately 8 hectares in size approximately 320m south-east of Thrandeston.
- **WSR 6** – Land parcel approximately 13 hectares in size approximately 500m south-east of Thrandeston.
- **WSR 7** – Land parcel approximately 21.5 hectares in size located next to the A140, which marks its eastern boundary.
- **WSR 8** – Land parcel approximately 8.5 hectares in size located adjacent to the A140, which marks its eastern boundary and is 500m to the west of Progress Power Station.

- **WSR 9** – Land parcel approximately 7 hectares in size located adjacent to the A140 to the west, Four Oaks Park caravan park to the south, and the village of Brome to the north.
- **WSR 10** – Land parcel approximately 12 hectares in size approximately 220m north-west of the village of Brome. The western boundary of the land parcel is bound by Abbey Close.
- **WSR 11** – Land parcel approximately 5 hectares in size approximately 430m north-west of the village of Brome. The western boundary of the land parcel is bound by Abbey Close.
- **WSR 12** – Land parcel approximately 10 hectares in size approximately 620m north-west of the village of Brome. Abbey Close is adjacent to the south-western corner of the land parcel.
- **WSR 13** – Land parcel approximately 4 hectares in size approximately 970m north-west of the village of Brome.
- **WSR 14** – Land parcel approximately 6 hectares in size approximately 900m north-east of the village of Thrandeston.
- **WSR 16** – Land parcel approximately 9 hectares in size approximately 435m west of the village of Brome. Abbey Close runs along the eastern boundary of the land parcel.
- **WSR 17** – Land parcel approximately 21.5 hectares in size approximately 700m east of the village of Thrandeston. Part of the northern boundary is bordered by Abbey Close and New Road, while the southern and western boundaries are defined by other minor unnamed roads.
- **WSR 18** – Land parcel approximately 5.5 hectares in size approximately 470m east of the village of Thrandeston.
- **WSR 19** – Land parcel approximately 6.5 hectares in size approximately 280m north-east of the village of Thrandeston.

Advanced Water Recycling Plant to Waveney (A-W)

- **A-W 1** – Pipeline corridor starting at Lowestoft Water Recycling Centre running north through Hopton-on-Sea before travelling southwest, following the route of the A143 and crossing a railway line close to St Olaves. It crosses the Broads National Park along the A143 then leaves the A143 around Haddiscoe.
- **A-W1A** – Pipeline corridor providing an alternative option to the above that provides flexibility in potential impacts to Priority Habitat close to Haddiscoe.

- **A-W2** – Pipeline corridor starting at Lowestoft Water Recycling Centre running north through Hopton-onSea before travelling southwest. It converges at the proposed discharge location at the River Waveney.
- **A-W3** – Pipeline corridor starting at Lowestoft Water Recycling Centre and travels west to the north of Blundeston. It runs south through the Broads National Park (for approximately 2.6km) before traversing west across various fields towards the proposed discharge location at the River Waveney.
- **A-W3A** – Pipeline corridor running in an east-west direction from its connection with A-W3 north of Blundeston to its connection with A-W2 at its crossing with Market Lane.
- **A-W3B** – Pipeline corridor running for approximately 1km south along the A143 from its connection with A-W3 to its connection with A-W2, to the east of Waterheath.
- **A-W4** – Pipeline corridor starting at the Lowestoft Water Recycling Centre then running south through Lowestoft then southwest along the A146 before running west skirting the southern edge of Beccles before it reaches the discharge location.
- **A-W4A** – Pipeline corridor providing an alternative to A-W4 between its crossing with the A47 and with Oulton Broad.
- **A-W4B** – Pipeline corridor providing an alternative to A-W4 between Mutford and its crossing with A145 south of Beccles.

Barsham Water Treatment Works to Central Service Reservoir (B-C)

- **B-C5** – Pipeline corridor starting at Barsham Water Treatment Works and ending at Lodgewood Water Tower.
- **B-C5A** – Pipeline corridor starting near Becks Green Lane and crosses the A144, B1123,B1117 and the River Blyth and ending close to Walpole.
- **B-C5B** – Pipeline corridor starting south of Ilketshall St Lawrence and ending east of Rumburgh.
- **B-C6** – Pipeline corridor starting at Barsham Water Treatment Works and running in a southerly direction to Lodgewood Water Tower.
- **B-C6A** – Pipeline corridor starting north of Redisham and finishing in Ilketshall St Lawrence
- **B-C6B** – Pipeline corridor starting south of Redisham and ending south of Ilketshall St Lawrence.
- **B-C6C** – Pipeline corridor starting west of Lower Common and finishing south of Spexhall.

Central Service Reservoir to Western Service Reservoir (C-W)

- **C-W7 –** Pipeline corridor running east-west passing north of Wilby and Eye and South of Horham and Brome.
- **C-W7A –** Pipeline corridor that connects to C-W7 and runs to the southwest to a connection with C-W8.
- **C-W7B –** Pipeline corridor that connects to C-W7 and runs southwest to a connection with C-W8 south of Wilby.
- **C-W7C –** Pipeline corridor providing an alternative route to C-W7 between the B1116 and Wilby.
- **C-W7D –** Pipeline corridor providing an alternative route to C-W7 between South Green and Brome.
- **C-W8 –** Pipeline corridor running east-west passing south of Wilby and Eye.
- **C-W8A** – Pipeline corridor running east-west passing south of Wilby and Eye to a connection with C-W7.

Central Service Reservoir to Saxmundham Water Tower (C-S)

- **C-S9** – Pipeline corridor starting near Lodgewood Water Tower and ending at Saxmundham Water Tower.
- **C-S10** – Pipeline corridor starting near Lodgewood Water Tower and ending at Saxmundham Water Tower in the most direct route.
- **C-S10A** – Pipeline corridor starting at a connection with C-S10 southeast of Sibton and ending at a connection with C-S9 northwest of Saxmundham.
- **C-S10B** – Pipeline corridor running from the central section of CS-10 to the area near Lonely Farm Country Park.

Saxmundham Water Tower to Sizewell (S-S)

- **S-S11** – Pipeline corridor running from Saxmundham around the north of Kelsale then passing through fields at the northern edge of Leiston and then to Sizewell.
- **S-S11A** – Pipeline corridor connecting S-S11 to the northwest of Saxmundham then running towards Theberton and ending at a reconnection point north of Leiston.
- **S-S12** – Pipeline corridor that runs around the south of Saxmundham before heading towards the northern edge of Leiston and then eastwards to Sizewell.

- **S-S12A** – Pipeline corridor that connects to S-S12 southeast of Saxmundham and then runs to a connection with S-S11.
- **S-S12B** – Pipeline corridor running from a connection with S-S12 through Aldringham and then to Sizewell C.
- **S-S12C** – Pipeline corridor running northwest to southeast past Knodishall.

1.5 This response will only focus on those proposed land parcels and pipeline corridors which are relevant to the Suffolk locations in the proposals.

1.6 Please see Appendix B for maps of the proposed land parcels and pipeline corridors.

1.7 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.

2 Policy Context

2.1 Initial comments on the options presented by the applicant in this consultation, are provided without prejudice to any comments the Council may wish to make, when, following further work by the applicant, more comprehensive information has been provided. The County Council has set out its response based on its Energy and Climate Adaptive Infrastructure Policy 2023, specifically:

*"**Priority Setting:** The County Council will identify its initial strategic priorities in relation to individual energy and water infrastructure projects coming forward, to help inform the development of those projects, and give clarity to developers, communities, and other parties. Those priorities will be kept under review as proposals are clarified and refined, or new information becomes available."*

2.2 At this stage, the interactions between specific impacts and values cannot be undertaken. However, the following provides a list that this authority considers need to be reviewed for considering pipeline routing and service reservoir locations:

- Residential address points, including residential care, directly impacted
- Non-residential address points directly impacted, and the economic or social contribution provided
- National/ international heritage, ecology, geological, landscape designations impacted
- Loss of irreplaceable habitats

- Widespread and/or significant, direct adverse impacts on ecological, geological, heritage, and landscape assets of regional or local significance
- Wider benefits –through habitat creation, recreation, health & wellbeing and economic activity

SCC Energy and Climate Adaptive Infrastructure Policy

2.3 At its Cabinet meeting on 16 May 2023, Suffolk County Council updated its adopted Energy Infrastructure Policy, indicating its overall stance on projects required to deliver the UK's Net Zero ambitions *and* adapt to a changing climate. (see Sources of Further Information section). The policy states:

2.4 "Project promoters should recognise from the outset, that the large scale of many energy and water proposals means that they will conflict with the character and the sensitivities of Suffolk's natural and historic environment, which underpins key economic sectors in Suffolk, and is central to the sense of place of our communities."

2.5 "... projects will not be supported unless the harms of the project alone, as well as cumulatively and in combination with other projects, are adequately recognised, assessed, appropriately mitigated, and, if necessary, compensated for."

2.6 SCC will follow this approach in this response, and throughout the subsequent DCO process.

2.7 SCC continues to be willing to work with the Applicant through the issues, towards improvement of the proposals and required mitigations, and looks forward to further engagement over the coming months.

3 Summary

3.1 Whilst the consultation provides a welcomed first step towards identifying the most suitable siting options, it is evident from the responses from many of the Council's technical experts that further dialogue and survey work is required before this can be achieved.

3.2 The County Council is firmly of the opinion that a routeing option through the middle of Lowestoft is unlikely to be feasible and is certainly highly undesirable due to the impacts upon traffic flows, amenity and practicality in terms of disturbance to other utilities.

3.3 Notwithstanding the above the alternative routes across The Norfolk & Suffolk Broads is also problematic. Accepting that there is likely to be no alternative, suitable proposals must be made to mitigate and compensate any potential harm made. In addition, the proposal should seek to further the purposes of the The Broads in accordance with s.85 of the Countryside and Rights of Way Act 2000. This could take the form of significant funding to support the management of The Broads

3.4 The County Council acknowledges that Essex & Suffolk Water agrees to pay for officer time in order that detailed responses may be formulated at this stage and throughout the Development Consent Order process.

Impact by Service Area

Due to the complexity and scale of the applicant's proposals, not all the relevant service areas have had the adequate opportunity to assess all the proposed land parcels and pipeline corridors in detail. Further communication and engagement will need to take place with the applicant to ensure that suitable assessment of the proposed scheme can be conducted by all relevant service areas. Please see Appendix A for the detailed technical comments by service area.

4 Archaeology

4.1 For all reservoir sites and pipeline alignments, Suffolk County Council Archaeological Service (SCCAS) would require upfront geophysical survey, followed by targeted evaluation trenching covering approximately five percent of the proposed areas.

Advanced Water Recycling Plant to Waveney (A-W)

4.2 A total of 260 known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.3 Of the identified assets, 29 are considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

Barsham Water Treatment Works to Central Service Reservoir (B-C)

4.4 A total of 194 known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.5 Of the identified assets, 13 are considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

Central Service Reservoir to Saxmundham Water Tower (C-S)

4.6 A total of 41 known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.7 Of the identified assets, six are considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

Saxmundham Water Tower to Sizewell (S-S)

4.8 A total of 332 known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.9 Of the identified assets, 37 are considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

Central Service Reservoir (CSR)

4.10 A total of one known heritage asset is located within the proposed land parcels documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.11 The identified heritage asset is considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

Western Service Reservoir (WSR)

4.12 A total of 11 known heritage assets located within the proposed land parcels documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

4.13 Of the identified assets, there are none considered to be of high significance due to the potential presence of human remains or evidence of past settlement.

4.14 To inform the final scheme design and routing of the pipeline corridor, a thorough desk-based assessment and field evaluation is needed. This should be undertaken at the earliest opportunity, to allow the archaeological potential of the different parts of the study area to be fully assessed and therefore the likely impacts of the proposed development on designated and non-designated heritage assets and sites of archaeological potential to be defined. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

5 Ecology and Biodiversity

5.1 SCC expect a full suite of ecological surveys for habitats and species that will be potentially impacted by the proposed works to be undertaken by suitably

qualified and experienced ecologists at the appropriate times of the year. The results of these surveys should be shared with the Suffolk Biodiversity Information Service (SBIS).

5.2 The impacts on protected species and habitats resulting from the proposal will need to be assessed in combination with all the other NSIPs that are proposed/taking place in the local area.

5.3 The applicant will need to demonstrate how they propose to deliver Biodiversity Net Gain with this project. It is likely BNG will be mandatory should consent be gained for this development.

5.4 Several location options for the Central Service Reservoir are likely to require hedgerow removal. Alternative options that do not require hedgerow loss should be considered. Any loss and fragmentation of habitat should be minimised wherever possible and compensation planting would be required.

5.5 The Advanced Water Recycling Facility is likely to have serious impacts on the Broads SPA/SAC/RAMSAR site. The applicant needs to demonstrate effects on this sensitive habitat can be minimised/ruled out.

5.6 Alternative options for the Western Service Reservoir should be considered as several of the current options feature locations with close proximity to SSSIs and Priority Habitats. SCC is concerned about the impact on these sites that may result from construction works and the potential loss of terrestrial connectivity. Hedgerow loss also remains a concern.

5.7 The potential impacts on Priority Habitats close to the options under consideration for the Barsham Water Treatment Works pipeline and the Central to Western Service Reservoir route will need to be assessed and appropriate mitigation measures drawn up where necessary.

6 Economy, Skills and Tourism

6.1 Suffolk is already hosting multiple Nationally Significant Infrastructure Projects (NSIPs), including nuclear and offshore wind developments as well as major grid reinforcement schemes. The cumulative demand for labour and skills across these projects is unprecedented and presents significant risks of labour market saturation, wage inflation, and displacement for local businesses. SCC therefore expects the promoter to have cumulative opportunity and negative impacts at the forefront of their thinking. A large amount of information and data is available on these projects and we expect the applicant to demonstrate this has been considered as part of the Environmental Statement.

6.2 It is recommended that the promoter adopts a strategic and collaborative approach to skills and employment, ensuring alignment with SCC's Regional Skills Coordination Function and the Suffolk Social Value Skills Ask, as set out in SCC's Energy and Climate Adaptive Infrastructure Policy – Socio-Economic

Effects of NSIPs. SCC expects that there is collaboration between not only the promoter and SCC but also with other NSIPs.

6.3 At this stage, the promoter has not yet engaged with the Regional Skills Coordination Function or published a socio-economic assessment. SCC has outlined its expectations and recommended methodology, drawing on supplementary guidance, in Appendix A Section 15.

7 Highways

7.1 Information has not yet been provided regarding vehicle or construction workforce forecasts or how traffic movements may be reduced. SCC expects these impacts to be fully assessed and mitigated.

Land Parcels:

Advanced Water Recycling Plant (AWRP)

7.2 This site will require highway access during the construction phase which may have a negative impact on the local network.

Barsham Water Treatment Plant

7.3 If improvements are required to the plant as part of the project, the transport impacts will need to be scoped in.

Central Service Reservoir (CSR)

7.4 The area surrounding this site is rural and has poor transport links for construction vehicles.

Western Service Reservoir (WSR)

7.5 A number of the sites under consideration would need to be accessed via local roads which are not capable of carrying large volumes of construction traffic. There may also be interaction with the Norwich to Tilbury transmission project.

Pipeline Corridors:

Advanced Water Recycling Plant to Waveney (A-W)

7.6 SCC would be keen to understand the proposals in terms of access; whether a few key accesses will be provided with internal access via temporary haul roads or if a large number of accesses will be required from the highway network.

7.7 The construction of a major pipeline through the urban area of Lowestoft is likely to be highly disruptive. Consideration must be given to the disruption this would cause road users, businesses and residents.

Barsham Water Treatment Works to Central Service Reservoir (B-C)

7.8 The routing of construction traffic through Halesworth via the A144 is concerning.

7.9 Access from the north via the Beccles relief road should be assessed as a potential option once impacts have been assessed.

Central Service Reservoir to Western Service Reservoir (C-W)

7.10 The main construction route for this corridor would need to be via B class roads which are not designed for construction use. Consideration should therefore be given to how the adverse impacts of construction traffic will be managed.

Central Service Reservoir to Saxmundham Water Tower (C-S)

7.11 Although close to the A12, the highway links from this road to the corridor are typically narrow, winding and unsuitable for significant numbers of large vehicles.

7.12 SCC is concerned that additional traffic at the A12/B119 Rendham Junction west of Saxmundham will have an adverse impact on road safety. This area is also under pressure from future developments such as the Sealink/ LionLInk convertor stations.

Saxmundham Water Tower to Sizewell (S-S)

7.13 There is significant interaction between this project and infrastructure constructed for other NSIPs such as Sizewell C. The impact of construction traffic associated with all NSIPs needs to be considered by the applicant.

8 Joint Emergency Planning Unit

8.1 The B1119 between Saxmundham and Leiston, plus Sizewell Gap are the main access routes for the Emergency Services responding to a radiation incident at Sizewell B. Any closure or restrictions on these roads is likely to delay the response and will require detailed consultation and comprehensive traffic management plans.

8.2 The proposed pipeline network to Sizewell C falls within the Sizewell B Detailed Emergency Planning Zone (DEPZ) under Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019, including the area where urgent countermeasures might be advised during any radiation emergency. As a result, the applicant will be required to develop emergency planning measures to respond to an emergency at the Sizewell B Nuclear Power Station prior to the preparation and construction of the project. To achieve this, Essex and Suffolk Water will liaise directly with the duty holder for Sizewell B offsite radiation emergency arrangements.

8.3 For each element of the project, all sources of flood risk should be considered, including an allowance for climate change to comply with the National Planning Policy Framework and ensure that they are safe for their lifetime and do not

place an increased burden and demand on the Emergency Services and Local Authority.

8.4 Careful and detailed coordination is required with other NSIPs in the area to minimise the cumulative impacts on the community and environment.

9 Local Lead Flood Authority

9.1 The project shall assess the flood risk of the proposed development and shall demonstrate that it will not increase flood risk elsewhere (during construction and operation) and provide mitigation where necessary as per National Policy Statement for water resources infrastructure, July 2025.

10 Landscape

10.1 SCC acknowledges the high-level project design principles that have been presented but further detail will need to be provided. These future design principles should be agreed with stakeholders. Please find these principles in Appendix A Section 19.

10.2 SCC believes that the project should aim to protect and enhance all rivers and watercourses it encounters, as well as priority habitats and ancient woodlands, mature trees and sensitive grasslands and meadowlands. The project should also aim to preserve and/or enhance the local landscape character within and outside the Suffolk Coast and Heaths AONB.

10.3 SCC expects that any surface infrastructure is appropriately landscaped so that built elements are successfully integrated into their context and screened from public viewpoints.

10.4 Please see Appendix A Section 19 for detailed landscape assessment of the proposed land parcels and pipeline corridors.

11 Planning

11.1 SCC is the Minerals and Waste Planning Authority in Suffolk. The proposed water related infrastructure appears to have the potential to come into conflict with the following existing development which appears on the safeguarding inset maps in the Suffolk Minerals & Waste Local Plan July 2020[1] (SMWLP).

[1] https://www.suffolk.gov.uk/planning-waste-and-environment/suffolk-minerals-and-waste-plan

i. Map W2, Site Reference CB1 Concrete Batching Plant, operated by C&H Quickmix, is very close to the proposed pipeline corridor A-W4B from the Advanced Water Treatment Plant – River Waveney

ii. Map W2, Sites Reference SAR20 Secondary Aggregates Recycling Site and WTF26 Waste Transfer Site, operated by Radical Waste, are very close to the proposed pipeline corridor A-W4B from the Advanced Water Treatment Plant – River Waveney

iii. Map W2, Site Reference SAR24 Secondary Aggregates Recycling Site and WTF22 Waste Transfer Site, operated by V C Cooke are very close to the proposed pipeline corridor A-W4B from the Advanced Water Treatment Plant – River Waveney

iv. Map SC1, Site Reference N1 Nuclear Site & IWER4 Incinerator Without Energy Recovery at Sizewell A Nuclear Power Station, and N2 Nuclear Site & IWER5 Incinerator Without Energy Recovery at Sizewell B Nuclear Power Station are very close to the proposed pipeline corridor S-S12B from Saxmundham Water Tower

v. Map SC2, Site Reference CB8 Concrete Batching Plant, operated by Cemex, is surrounded by the proposed pipeline corridor S-S11A from Saxmundham Water Tower

vi. Map MS3 Site Reference MELV5, Metals/End of Life Vehicles operated by F A Edwards & Son Ltd is surrounded by the proposed pipeline corridor CW7 between the Central Service Reservoir and the Western Service Reservoir.

11.2 The surface spread of the County's sand and gravel resources is shown on the Minerals & Waste Safeguarding & Proposals Map of the SMWLP. In terms of minerals safeguarding, the sand and gravel resources within Suffolk are of at most regional importance as opposed to these proposals which are of national significance.

11.3 Furthermore, under normal circumstances proposals for sand and gravel extraction in areas of statutory landscape or ecological constraint would in any case not be granted planning permission. This is relevant to the consideration of sterilisation of the minerals resources situated in The Norfolk & Suffolk Broads and The Suffolk & Essex Coast & Heaths National Landscape.

11.4 The proposed development would inevitably sterilize sand and gravel resources. Where possible the aggregates disturbed by the proposed development should be utilised in its construction.

11.5 SCC also determines planning applications for its own development including new schools and highways improvements. There are no known conflicts at the time of writing.

12 Public Health

12.1 The consenting and construction of major infrastructure projects such as the Proposed Scheme can have significant and enduring impacts on community wellbeing and in some instances can result in a deterioration in mental health of local residents.

12.2 Groups such as children and young people, older adults, people with long term health conditions, carers, those with limited mobility, digitally excluded households, individuals experiencing deprivation, along with other populations at higher risk of poor health outcomes or disproportionate impacts from social, economic, or environmental changes (collectively referred to herein as vulnerable groups) are more likely to be disproportionately affected. Vulnerable groups are present at all locations affected by the proposed project. Supporting community resilience and mental health must therefore be an essential component of the project.

12.3 Public Health expect the applicant to demonstrate measures above and beyond policy requirements to protect affected communities. Underpinning this is the need for clear, accessible and inclusive communication. Engagement approaches should align with SCCs Community Engagement and Wellbeing Supplementary Guidance Document and must reflect the differing levels of digital access, health literacy, and support needs across communities.

12.4 A particular concern to Public Health is the potential lack of respite for affected communities from NSIP activity. It is strongly recommended that the applicant plan construction working hours in a way that protects community health and provides meaningful periods of respite.

12.5 Site specific data and insight for each of the proposed land parcels and pipeline corridors can be found in Appendix A Section 20.

12.6 Public Health have drawn upon Lower Super Output Area (LSOA) datasets from Local Insight (profile generated 13/11/2025) to assess the site areas as far as practically possible, including those extending into Norfolk where the scheme footprint necessitates cross boundary analysis.

12.7 A large amount of information and data is also available from existing Suffolk NSIP projects, and this should also be considered as part of the development of the proposal.

13 Public Rights of Way (PRoW)

13.1 The applicant should be aware of SCC Energy and Climate Adaptive Infrastructure Policy Public Rights of Way and Green Access https://www.suffolk.gov.uk/asset-library/prow-greenaccess.v4.pdf

13.2 When dealing with Rights of Way issues SCC expects promoters of infrastructure projects to consider the importance of, and impacts upon, Public Rights of Way or Green Access when developing their projects.

13.3 Public Rights of Way and Green Access need to be treated by applicants in a different way to other types of highways, because of their unique characteristics and status, specifically in terms of their relationship to place, public amenity, historic and landscape character, well-being, and access to nature. Therefore, for example, it is wholly inappropriate to equate a car journey with a countryside walk, when assigning value to usage of rights of way and public open space.

13.4 It is expected that promoters will mitigate and compensate for the adverse impact of construction and operation of their schemes, in accordance with the mitigation hierarchy, as set out in National Policy Statement NPS EN -1 (November 2023).

13.5 The applicant should minimise the adverse impacts during both construction and operation of the project on the Rights of Way Network considering the following factors:

- **Physical changes to resources** (i.e. changes to PRoW through diversions or temporary and permanent closures, severance, loss of connectivity, changes to journey length).
- **Changes to the quality of the experience** people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, light pollution, and traffic.
- **User stress**, that is effects experienced by receptors due to route uncertainty and safety fears.
- **Changes to the experience** of people using recreational resources, due to increases in numbers of people using them i.e. displacement of people from one area to another.
- **Tranquillity and ambience experienced** by recreational receptors.

13.6 SCC PRoW respectfully asks that all PRoW be considered in their own subject heading, due to their unique characteristics and status.

13.7 The proposals do not cover specific mitigation for PRoWs, promoted routes/ trails, open access or other green access infrastructure. We require more information on:

- Temporary diversions/ closures, with regards to closure/diversions times, durations, proposed diversion routes and assessments of diversion routes.
- The mitigation strategies for routes with no alternative routes/ diversions.

13.8 The proposals mention construction compounds which should be situated a clear distance from the PRoW to avoid tunnel effects on the routes which may discourage usage. Any stockpiling should not obstruct the PRoW.

Suffolk County Council

SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE

Appendix A (Detailed Technical Comments)

Suffolk County Council

14 Archaeology

General note on all reservoirs and pipelines

14.1 For all reservoir sites and pipeline alignments, Suffolk County Council Archaeological Service (SCCAS) would require upfront geophysical survey, followed by targeted evaluation trenching covering approximately five percent of the proposed areas.

14.2 Early geophysical survey and targeted evaluation provide a reliable understanding of below-ground heritage assets, enabling realistic archaeological timelines. This approach supports accurate construction scheduling, reduces delay risks, and controls costs. It also allows timely pipeline realignment to avoid the most significant heritage assets.

14.3 The results outlined below only represent the known Heritage Assets (839) recorded on the Suffolk Historic Environment Record (SHER), those that have been noted as having a "High" significance (86), have been highlighted, as they are already known to have additional requirements beyond the other known Heritage Assets, e.g. are significant settlement sites, have probable human remains, are significant Scheduled Ancient Monuments that are immediately adjacent to the route, or are extant Assets that need to be avoided.

14.4 However, this does not take away from the fact that the remaining known Heritage Assets recorded on the SHER (not specifically highlighted in this report), would still need to be appropriately assessed, through geophysical survey, evaluation trenching and possible mitigation.

14.5 It must be reiterated that these are only the known Heritage Assets and from recent experience of various pipelines and other NSIP projects the know Heritage Assets are only a small percentage of the Heritage Assets that were eventually identified on these projects.

14.6 There is the potential for any newly identified Heritage Assets identified during the geophysical survey and evaluation phases of work to be of high significance, and some of which may be worthy of preservation in situ.

AWRP Waveney (A-W)

Summary - Route overall

14.7 A total of two hundred and sixty known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.8 Of the identified assets, twenty-nine are considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the

projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

- **Route 1A** Not in Suffolk
- **Route 3B** Not in Suffolk
- **Route 4A** Has fifteen known heritage assets, with none being of high significance
- **Site 5.5** Not in Suffolk

High Significance records details

Route 1

14.9 Has twenty-one known heritage assets, with three being of high significance.

- **COR 012** Cropmarks of co-axial field system, enclosures, and trackway: – can be mitigated
- **COR 014** Cropmarks and soilmarks of an area of co-axial fields and enclosures: – can be mitigated
- **COR 064** Barrow cemetery: – can be mitigated

Route 2

14.10 Has fifty-six known heritage assets, with nine being of high significance

- **ASY 002** Cropmarks of enclosures, trackways, and field systems: – can be mitigated
- **ASY 003** Cropmarks of field boundaries and a ring ditch: – can be mitigated
- **ASY 004** Cropmark of a ring ditch: – can be mitigated
- **COR 012** Cropmarks of co-axial field system, enclosures, and trackway: – can be mitigated
- **COR 014** Cropmarks and soilmarks of an area of co-axial fields and enclosures: – can be mitigated
- **COR 064** Barrow cemetery: – can be mitigated
- **LUD 016** Cropmarks of rectilinear enclosures, field boundaries, and track ways: – can be mitigated

Route 3

14.11 Has forty-seven known heritage assets, with four being of high significance

- **BLN 009** Cropmark of double concentric ring ditch: – can be mitigated
- **BLN 013** Cropmark of a ring ditch: – can be mitigated
- **BLN 014** Cropmark of a ring ditch: – can be mitigated

- **LUD 006** Cropmark of rectilinear enclosure: – can be mitigated

Route 3A

14.12 Has five known heritage assets, with two being of high significance

- **SOL 010** Cropmarks of enclosures, ring ditches, and field systems: – can be mitigated
- **LUD 016** Cropmarks of enclosure, trackways, and field systems: – can be mitigated

Route 4

14.13 Has eighty-two known heritage assets, with five being of high significance

- **BRS 007** Cropmark of two ring ditches: – can be mitigated
- **BRS 027** Cropmark of a ring ditch: – can be mitigated
- **BRS 028** Cropmark of rectilinear ditched enclosure: – can be mitigated
- **BRS 029** Cropmark of a ring ditch: – can be mitigated
- **SMW 009** Cropmark of ditched enclosure: – can be mitigated

Route 4B

14.14 Has twelve known heritage assets, with one being of high significance

- **NHC 012** Scatter of Roman metalwork and pottery: – can be mitigated

Site 3.1

14.15 Has twelve known heritage assets, with five being of high significance

- **BLN 004** Cropmark of double concentric ring ditch: – can be mitigated
- **BLN 066** Cropmarks of a barrow cemetery: – can be mitigated
- **COR 012** Cropmarks of co-axial field system, enclosures, and trackway: – can be mitigated

Site 3.2

14.16 Has eight known heritage assets, with four being of high significance

- **COR 012** Cropmarks of co-axial field system, enclosures, and trackway: – can be mitigated
- **LUD 008** Cropmarks of rectilinear enclosures, field boundaries, and track ways: – can be mitigated
- **LUD 045** Cropmarks of ring ditches: – can be mitigated

- **LUD 072** Cropmarks of ring ditches forming a barrow cemetery: – can be mitigated

Barsham WTW Central Service Reservoir (B-C)

Route overall

14.17 A total of one hundred and ninety-four known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.18 Of the identified assets, thirteen are considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

- **Route 5** has nineteen known heritage assets, with none being of high significance
- **Route 5B** has four known heritage assets, with none being of high significance
- **Route 6A** has three known heritage assets, with none being of high significance
- **Route 6B** has two known heritage assets, with none being of high significance
- **Route 6C** has two known heritage assets, with none being of high significance
- **Route 7A** has two known heritage assets, with none being of high significance
- **Route 7D** has three known heritage assets, with none being of high significance
- **Route 8A** has no known heritage assets

14.19 High Significance records details

Route 5A

14.20 Has thirty-two known heritage sites, with one being of high significance

- **CHD 064** Anomalies of a possible building: – can be mitigated

Route 6

14.21 Has twenty-four known heritage sites, with four being of high significance

- **RSM 003** Earthworks of manorial enclosure: – can be mitigated

Route 7

14.22 Has forty-nine known heritage assets, with four being of high significance.

- **BRM 134** Archaeological investigation identified Late Iron Age/Early Roman settlement activity and modern pits relating to the WW2 airfield : – can be mitigated
- **EYE 003** Saxon Cremation cemetery: – can be mitigated
- **LXD 057** Three sides of substantial rectangular moat to S with larger possible moated area to N plus various ponds to SE shown on 1880s OS map -: – can be mitigated
- **TDE 001** Moated complex, occupied, near parish boundary : – can be mitigated

Route 7B

14.23 Has two known heritage assets, with one being of high significance.

- **WBY 007** Circular mound –: – can be mitigated

Route 7C

14.24 Has three known heritage assets, with one being of high significance.

- **SBK 023** possible building platform earthwork: – can be mitigated

Route 8

14.25 Has forty-nine known heritage assets, with eight being of high significance.

- **YAX 017** Saxon metalwork scatter, indicative of cemetery: – AVOID
- **YAX 018** Saxon metalwork scatter, indicative of cemetery: – AVOID
- **YAX 024** Roman metalwork scatter : – can be mitigated
- **YAX 029** small Roman metalwork scatter medieval background metalwork scatter : – can be mitigated
- **YAX 073** Roman Artefact scatter of pottery and metalwork, indicating a probable Roman settlement, Early Medieval/Saxon scatter indicating probable cemetery and Medieval scatter of pottery and metalwork- Is subject to current archaeological evaluation. Is located on the site of Progress Power battery storage site: – AVOID

Central Service Reservoir to Saxmundham

Route overall

14.26 A total of forty-one known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.27 Of the identified assets, six are considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

- **Route 10A** has two known heritage assets, with none being of high significance.
- **Route 10B** has one known heritage asset, which is not of high significance.

High Significance records details

Route 9

14.28 Has twenty known heritage assets, with four being of high significance.

- **BNL 010** Extant earthworks of Ridge and Furrow: AVOID
- **RNM 008** Ring Ditch: – can be mitigated
- **RNM 009** Ring Ditch: – can be mitigated
- **RNM 011** Ring Ditch: – can be mitigated

Route 10

14.29 Has eighteen known heritage assets, with two being of high significance.

- **SBT 002** Sibton Abbey, Western part of the corridor is very close to the Scheduled Ancient Monument and significant medieval remains may be encountered It is recommended that the pipeline and construction be limited to the eastern side of the proposed corridor. Note Historic England will need to be consulted
- **SBT 018** Sibton Park As above

Saxmundham to Sizewell

Route overall

14.30 A total of three hundred and thirty-two known heritage assets located within the proposed route corridor are documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.31 Of the identified assets, thirty-seven are considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

14.32 **Please Note:** This route passes through a number of areas that are part of other NSIP projects e.g. Sizewell, the Saxmundham Converter Station, Lionlink and Sealink. Various geophysical surveys and evaluations have taken place for these projects that have identified significant archaeological remains. In some cases the archaeology has been avoided, but when unavoidable has been excavated but these remains may continue into this proposed route. Also, this route crosses some of those developments that are now being constructed. The results from these projects in the main are not currently included in the HER results, but there are now additional known heritage assets in a number of these areas, some of which are of high significance.

- **Route 12C** has no known heritage assets.

High Significance records details

Route 11

14.33 Has sixty-nine known heritage assets, with eleven being of high significance.

- **LCS 001** Leiston Abbey Western part of the corridor is very close to the Scheduled Ancient Monument and significant medieval remains may be encountered It is recommended that the pipeline and construction be limited to the eastern side of the proposed corridor. Note Historic England will need to be consulted
- **SXM 027** Extant Hexagonal WW2 Pillbox: AVOID
- **KCC 010** Remains of hearth, Saxon? crushed grey ware pot: – can be mitigated
- **LCS 036** Ring Ditch: – can be mitigated
- **LCS 039** Ring Ditch: – can be mitigated
- **LCS 044** Ring Ditch: – can be mitigated
- **LCS 076** Ring Ditch: – can be mitigated
- **LCS 077** Ring Ditch: – can be mitigated

- **LCS 181** Ring Ditch: – can be mitigated
- **LCS 182** Site of possible Saltern: – can be mitigated
- **LCS 279** Adjacent to extensive Prehistoric Settlement activity identified during Sizewell C excavations.: – can be mitigated

Route 11A

14.34 Has eleven known heritage assets, with six being of high significance.

- **THB 047** & **THB 073** Sizewell C Excavation Area adjacent to Saxon settlement and burials: – can be mitigated
- **THB 059** & **THB 071** Sizewell C Excavation Area large late Saxon cemetery: – can be mitigated
- **THB 070** Sizewell C Excavation Area : – can be mitigated
- **THB 074** Sizewell C Excavation Area : – can be mitigated

Route 12

14.35 Has one hundred and eighty-nine known heritage assets, with four being of high significance.

- **SXM 050** Geophysical survey identified anomalies representing possible trackway, encolsure ditches, possible structures or areas of burning: – can be mitigated
- **SXM 054** Geophysical survey identified anomalies representing possible post Medieval features comprising quarry pits, pits, ditches, field enclosures and magnetic disturbance associated with the Benhall Brickworks and possible Kiln site: – can be mitigated
- **SXM 085** Geophysical survey identified anomalies representing possible Iron/Romano-British through to the early medieval: – can be mitigated
- **SXM 086** Geophysical survey identified anomalies representing possible field boundaries, enclosure and possible roundhouse: – can be mitigated

Route 12A

14.36 Has eleven known heritage assets, with two being of high significance.

- **SXM 085** Geophysical survey identified anomalies representing possible Iron/Romano-British through to the early medieval: – can be mitigated
- **SXM 088** Lionlink Geophysical survey and evaluation: – can be mitigated

Route 12B

14.37 Has fifty-two known heritage assets, with fourteen being of high significance.

- **ARG 117** EA1N/EA2 Geophysical survey and evaluation Roman Remains: – can be mitigated
- **ARG 147** EA1N/EA2 Geophysical survey and evaluation archaeological remains: – can be mitigated
- **ARG 159** EA1N EA2 Geo Area of linear anomalies, including possible trackways and enclosures
- **KND 147** Lionlink Geo Eval archaeological remains: – can be mitigated
- **KND 150** EA1N/EA2 excavation: – can be mitigated
- **KND 061** EA1N/EA2 L-shaped linear anomaly identified during geophysical survey: – can be mitigated
- **LCS 059** Multi-period cropmarks of probable field boundaries and enclosures are visible on aerial photographs. They are undated, but more than one phase is apparent. An Iron Age to Roman date for some of the cropmarks is plausible: – can be mitigated
- **LCS150** Medieval Settlement with evidence of industrial activity on edge of Settlement, on opposite side of the road but probably on this side too: – can be mitigated
- **LCS 385** EA1N EA2 excavation : – can be mitigated
- **LCS 386** EA1N EA2 excavation : – can be mitigated
- **LCS 387** EA1N EA2 excavation : – can be mitigated
- **LCS 403** Geophysical anomaly, probably representing an undated ring ditch: – can be mitigated
- **SNF 033** Anomalies of probable post medieval field systems Ring Ditch and ponds: – can be mitigated
- **SNF 038** Geophysical survey identified a possible rectilinear enclosure: – can be mitigated

Western SR Land Parcels

Route overall

14.38 A total of Eleven known heritage assets located within the proposed land parcels documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.39 Of the identified assets, there are none considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the

projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

- **WSR Land Parcel 3** has one known heritage asset, which is not of high significance.
- **WSR Land Parcel 4** has two known heritage assets, with none being of high significance.
- **WSR Land Parcel 7** has Three known heritage assets, with none being of high significance.
- **WSR Land Parcel 8** has three known heritage assets, with none being of high significance.
- **WSR Land Parcel 9** has two known heritage assets, with none being of high significance.
- **WSR Land Parcel 14** has one known heritage asset, which is not of high significance.
- **WSR Land Parcel 16** has two known heritage assets, with none being of high significance.

Central SR Land Parcels

Route overall

14.40 A total of one known heritage asset is located within the proposed land parcels documented in the Suffolk Historic Environment Record (SHER). None of these assets are currently assessed as being of schedulable quality, and therefore their impact can be appropriately mitigated through archaeological investigation and recording.

14.41 The identified heritage asset is considered to be of high significance due to the potential presence of human remains or evidence of past settlement. While preservation in situ is typically recommended for such features, the projected impacts may be acceptably addressed through a programme of systematic archaeological excavation unless stated in the individual routes.

High Significance records details

- **CSR Land Parcel 2** has one known heritage assets, with one being of high significance
- **WLP001**- Packway Farm moated enclosure: – can be mitigated

SCC recommended approach to archaeology SWRTS

14.42 As well as the known archaeological record, there is high potential for additional, and as yet unknown, heritage assets of archaeological significance

to survive across large parts of all areas of the scheme. This is demonstrated by archaeological surveys recently undertaken for other major infrastructure projects, in similar landscape locations and with equivalent initial archaeological baseline data, which have identified a significant number of additional archaeological sites which were not previously recorded on the County HER, or where recorded, were previously only areas of undefined potential based upon finds scatter or cropmark evidence. Some as yet unknown sites may be of national significance and worthy of preservation in situ. As such without further archaeological assessment to fully characterise the heritage resource, the impacts of the development upon above and below ground heritage assets cannot be fully understood.

Further assessment required

14.43 To inform the final scheme design and routing of the pipeline corridor, a thorough desk-based assessment and field evaluation is needed. This should be undertaken at the earliest opportunity, to allow the archaeological potential of the different parts of the study area to be fully assessed and therefore the likely impacts of the proposed development on designated and non-designated heritage assets and sites of archaeological potential to be defined. Evaluation will provide sufficient baseline information to enable design decisions to be made and to inform planning decisions.

14.44 A desk-based assessment would be appropriate in the first instance. This should include a full and up-to-date HER search, historic map regression, a study of aerial photography (including historical imagery and aerial photographs held by The Historic England Archive and Library at Swindon), an assessment of LIDAR data, and predictive modelling of potential based upon topographic and geological evidence. Datasets held by the County Records office and other archive sources may also need to be consulted where features merit more detailed research.

14.45 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.

14.46 Landscape should be considered for assessment as an aspect of the historic environment. Interrelationships between archaeology, the historic landscape and the built environment should be addressed in the assessment. The lack of a holistic approach to assessing the impact on landscape has given rise to omissions in other recent applications.

14.47 All areas which will be impacted by the different elements of the scheme should be subject to archaeological field assessment at this stage (including preferred

pipeline corridor routes) to allow for preservation in situ where appropriate of any sites of importance that might be defined and which are currently unknown.

14.48 Geophysical survey should form a first phase of field evaluation. The results of this survey should be used to inform a programme of trial trenched evaluation, combined with metal detecting in order to ground truth the geophysics results, alongside palaeo-environmental assessment in river valley areas as appropriate.

14.49 We advise that all sites which will be impacted on by any element of the scheme should be subject to a full suite of archaeological assessment (desk-based, geophysical and trial trenched evaluation) prior to/at EIA stage, with the results of these investigations used to inform final site design/routing. Undertaking full archaeological evaluation at the earliest possible opportunity will enable the results of the surveys to be used to assist with project programming and to contribute to risk management. Upfront work will ensure all options can be properly considered and the scope of mitigation defined (including giving proper thought to preservation in situ and alternative routing), thereby avoiding unexpected costs and delays post-consent. Evaluation at the earliest opportunity will test the suitability of different routes. This is particularly important given the reduced flexibility for mitigation through design once routes for the scheme have been determined and for aspects of the scheme where removing ground disturbance is not possible.

14.50 Any unevaluated areas of the scheme will represent a high degree of risk for the development. Failure to adequately evaluate the site at an early stage could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided and which have the potential to leave a scheme which is undeliverable. Any areas that are not subject to trenched archaeological evaluation prior to the determination of this application would carry a high level of risk which will need to be accommodated by incorporating substantial flexibility in the design, work schedule and budget. Therefore, it is strongly recommended that sufficient trenched archaeological evaluation is undertaken across the full redline area to provide essential baseline information on the archaeological resource, in order to inform and design an appropriate mitigation strategy. Any parts of the proposal area which are scheme critical, or where limited design flexibility will be possible, are a particular priority for early assessment.

14.51 It is important to note that there exists a potential conflict for some routes with large NSIP's in the area, EA1N/EA2, Lion Link, Sea Link and Sizewell C. These conflicts may impact flexibility of design and timescales, both for construction and for the necessary archaeological assessments, therefore, it is vital that robust and effective channels of communication are established between the projects.

14.52 The combined results of the above assessments should be used to develop a comprehensive mitigation strategy. Some archaeological remains (including

those as yet unidentified) may require localised preservation in situ, either because their significance warrants this or to avoid alternative mitigation. For below ground archaeological heritage assets, where (1) development impacts are proposed that will damage or destroy those remains and (2) where mitigation through investigation and recording is considered acceptable, and is preferred to the use of design solutions to achieve preservation in situ, the mitigation identified 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.

14.53 All phases of archaeological evaluation and mitigation must be led by a brief produced by SCCAS and 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.

14.54 Archaeological remains that have been preserved in situ as part of archaeological mitigation strategies must be protected from damage during construction. If any areas of archaeology are to be preserved in situ, then a strategy for ongoing protection of these remains throughout construction, must be agreed and included within the mitigation strategy for the development, and provision must be made for a detailed Historic Environment Management Plan (HEMP) to secure the appropriate management of these areas within the development going forward.

14.55 As has been shown by other Nationally Significant Infrastructure Projects in the region, time will be a critical factor. Archaeological and heritage assessments and resultant archaeological mitigation phases should be programmed into the project at the earliest opportunity. Sufficient time must be allowed to enable evaluations to be undertaken, taking into account agricultural cycles and time required for landowner negotiations (which should commence at the earliest opportunity) and also all fieldwork to be completed prior to the start of construction works, so as to avoid any delays to the development schedule. We would advise that an archaeological consultant is bought on board early on, and an archaeological clerk of works (ACoW) employed to manage interactions between the archaeological, ecological, and engineering teams.

14.56 As numerous other large development projects are currently being undertaken in the county at present, this may put pressure on available archaeological work forces which is something to be aware of.

15 Ecology and Biodiversity

15.1 The Ecology Team expect a full suite of ecological surveys for habitats and species that will be potentially impacted by the proposed works to be

undertaken by suitably qualified and experienced ecologists at the appropriate times of the year.

15.2 The results of these surveys should be shared with the Suffolk Biodiversity Information Service (SBIS).

15.3 How will the loss/fragmentation of habitat connectivity be addressed during construction and restored once all works are complete?

15.4 The impacts on protected species and habitats resulting from the proposal will need to be assessed in combination with all the other NSIPs that are proposed/taking place in the local area. The applicant will need to demonstrate how this will be addressed. This is particularly prevalent for the Saxmundham Water Tower to Sizewell pipeline which is close to/within the Minsmere-Walberswick SPA and Sandlings SPA.

15.5 The applicant will need to demonstrate how they propose to deliver Biodiversity Net Gain with this project. It is likely BNG will be a mandatory should consent be gained for this development.

15.6 The Ecology Team would like to know if there are proposals to offset the anticipated habitat loss with mitigation/compensation habitats – habitat type(s) and location(s) would be most welcome (e.g. skylark plots).

15.7 The impacts on any watercourses should be assessed by appropriately accredited and suitably qualified ecologists. Surveys for Otter, Water Vole, European Eel and INNS should be undertaken on any watercourses potentially impacted by the proposed development.

15.8 The Ecology Team have concerns that several location options for the Central Service Reservoir locations are likely to require hedgerow removal if the reservoir is to be built at the given location. We would like to see other options that do not require hedgerow loss to be considered. Loss/fragmentation of habitat connectivity should be minimised wherever possible. Compensation planting would be required in order to maintain habitat connectivity throughout the order limits.

15.9 The proposed pipeline/advanced water recycling facility being considered for the Waveney Valley is likely to have serious impacts on the Broads SPA/SAC/RAMSAR site. The applicant will need to demonstrate how likely significant effects on this sensitive habitat can be minimised/ruled out.

15.10 Alternative options for the western service reservoir should be considered; several of the current options highlight the proximity of the locations to SSSIs and Priority Habitats and the Ecology Team are concerned about impacts on these sensitive sites that may result from works to construct the reservoir and the potential loss of terrestrial connectivity that would result from the newly built reservoir. As with the options for the Central Service Reservoir, there are

concerns about the potential hedgerow loss that would be associated with numerous options for the reservoir locations.

15.11 Barsham Water Treatment works. Potential impacts on Priority Habitats adjacent to some proposed locations will need to be assessed and appropriate mitigation measures drawn up where necessary.

15.12 Central Service Reservoir to Western Service Reservoir: potential impacts on Priority Habitats close to some options under consideration will need to be assessed and appropriate mitigation measures drawn up where necessary. Avoidance of sensitive habitats such as Floodplain Grazing Marsh is essential.

16 Economy, Skills and Tourism

16.1 The Council recognises the strategic importance of this project in securing long-term water resilience for East Anglia, supporting economic growth, and enabling critical infrastructure such as Sizewell C. The project includes an Advanced Water Recycling Plant, two new service reservoirs, and approximately 120 km of pipelines. These works will require significant construction activity and specialist engineering capability over an extended period.

16.2 Suffolk is already hosting multiple Nationally Significant Infrastructure Projects (NSIPs), including nuclear and offshore wind developments as well as major grid reinforcement schemes. The cumulative demand for labour and skills across these projects is unprecedented and presents significant risks of labour market saturation, wage inflation, and displacement for local businesses. SCC therefore expects the promoter to have cumulative opportunity and negative impacts at the forefront of their thinking. A large amount of information and data is available on these projects and we expect the applicant to demonstrate this has been considered as part of the Environmental Statement.

16.3 We recommend the promoter adopts a strategic and collaborative approach to skills and employment, ensuring alignment with SCC's Regional Skills Coordination Function and the Suffolk Social Value Skills Ask, as set out in SCC's Energy and Climate Adaptive Infrastructure Policy – Socio-Economic Effects of NSIPs. SCC expects that there is collaboration between not only the promotor and SCC but also with other NSIPs.

16.4 At this stage, the promoter has not yet engaged with the Regional Skills Coordination Function or published a socio-economic assessment. Therefore, SCC is taking this opportunity to outline our expectations and recommended methodology, drawing on the supplementary guidance.

16.5 As outlined in the supplementary guidance, the promoter must undertake a robust, evidence-led workforce assessment that quantifies labour requirements by phase and skill level. This assessment should identify the

likely origins of the workforce (local, regional, or non-local) using realistic commute time scenarios (eg. 30 minutes for unskilled roles and 30–90 minutes for skilled roles).

16.6 Low, medium, and high probability scenarios for home-based employment should be modelled, with the low scenario used for impact assessments. This analysis must consider cumulative impacts with other NSIPs and inform modelling for transport, accommodation, and housing as well as potential displacement effects on local businesses and services, with strongly evidenced assumptions.

16.7 The promoter should begin with a robust baseline assessment of local labour market characteristics, supply chain capabilities, educational and training infrastructure, and the socio-economic profile of communities within the zone of influence. This assessment must use publicly available datasets and involve stakeholder engagement with SCC and partners. Workforce requirements should be quantified by skill level and trade for each phase, and the assessment should evaluate whether these needs can be met locally or regionally or will require inward migration. The geographic labour catchment areas should be identified using realistic commute times, and the assessment should include both direct and indirect economic impacts, including Gross Value Added, using a scenario-based approach for regional supply chain engagement. A realistic mapping of Tier 1 and Tier 2 supplier opportunities must be undertaken, and the readiness of the local supply chain to scale should be assessed through active dialogue with business groups and chambers of commerce.

16.8 SCC expects the promoter to establish an agreed governance framework for skills delivery in collaboration with SCC's Regional Skills Coordination Function, as outlined in the supplementary guidance document. The promoter should support existing and emerging local initiatives, including the Suffolk Social Value Skills Ask, and differentiate between civil engineering roles and mechanical/electrical roles to identify distinct legacy opportunities. Financial measures for skills training in appropriate sectors should be provided and all initiatives must ensure inclusive access to training and employment opportunities, removing barriers for underrepresented groups. These measures should be embedded in a Skills and Employment Plan within the project's delivery framework and include a clear statement of social value delivery, referencing the HMG Social Value Model and SCC's supplementary guidance.

16.9 The promoter has stated that the project will deliver benefits for local communities by creating jobs and training opportunities during construction, working with schools and colleges to share knowledge about water treatment, and committing to spend more than 60 pence of every pound with local suppliers. SCC welcomes these commitments but expects them to be formalised within a clear governance framework and linked to measurable

outcomes. Specifically, SCC expects the promoter to set out how engagement with education providers will translate into accredited training and pathways into employment, and how local procurement targets will be monitored and reported. These measures should align with SCC's supplementary guidance and the Suffolk Social Value Skills Ask, ensuring that the project delivers a lasting legacy of skills development and economic resilience rather than short-term benefits.

16.10 Labour market saturation due to overlapping NSIP construction phases is a key risk for the project. All risks must be assessed and mitigated through early engagement and coordinated planning.

16.11 The project presents potential for regional benefit, contingent upon the appropriate assessment, mitigation, and proactive securing of opportunities. SCC is committed to working collaboratively with the promoter and requests early engagement to agree the workforce and supply chain assessment methodology in advance of formal scoping or Preliminary Environmental Information Report (PEIR) submission. Delivering a coordinated skills programme will ensure Suffolk residents benefit from the opportunities arising from this project.

17 Highways

17.1 SCC, as the Local Highway Authority with regards to highways within Suffolk, is the lead authority on Traffic and Transport matters.

17.2 The Applicant will be aware that a number of recent NSIPs have been submitted and given consent in the local area most notably, Sizewell C, East Anglia One North and Two and East Anglia Two with Norwich to Tilbury, Sealink, Lionlink, Eco Power at the pre-application stage. The Applicant must also consider Town and Country Planning Act solar farm applications.

17.3 SCC considers that this project should continue discussions with all of the above developers to minimise highways impacts on the local communities, such as requirements for materials and associated HGV movements, workforce numbers and traffic management on the highway network.

17.4 As no information has yet been provided regarding vehicle or construction workforce forecasts or how traffic movements may be reduced e.g. through the use of haul roads. SCC expects these impacts to be fully assessed and mitigated, especially as regards to any potential construction traffic impacts on SCC's rural road network and the limited options for suitable HGV and AIL routes. Decommissioning/removal also needs careful consideration.

Advanced Water Recycling Plant (Lowestoft)

17.5 Will require highway access during construction phase which may have a negative impact on the local network. Resilient operational access will also be

required. Location adjacent to the Strategic Road Network is an advantage although it is noted that if Jays Lane is considered for use this will need significant improvement to do so.

Barsham Water Treatment Plant

17.6 If improvements are required to this plant as part of the project the transport impacts will need to be scoped in. Opportunities to improve long term resilient access should be explored.

Central Service Reservoir

17.7 This is located in a rural area with poor transport links for construction vehicles. The A1120 itself is only considered as a zone distributor in the recommended lorry route network map and is promoted as a tourist route.

Western Service Reservoir

17.8 Whilst located near the A140 a number of the sites under consideration would need to be accessed via local roads that are clearly not capable of carrying large volumes of construction traffic. The western options may interact with the Norwich to Tilbury transmission project.

Pipelines

17.9 A major challenge on this and all routes will be gaining access during the construction phase as the local network is not suitable for large numbers of HGVs or indeed worker movements. Movements of Abnormal Indivisible Loads (>44 tonnes) will likely be a challenge especially as the route crosses a number of watercourses and hence bridges which may have weight restrictions applicable to AILs.

17.10 Without a deep dive into the detail in highway terms it is difficult to advise on which of the options are less harmful than others.

17.11 Attention is drawn to the emerging difficulties of moving AILs in the county with restrictions being applied to many aging structures. Early engagement between the applicant and the highway authority is recommended to review and assess all structures on AIL routes and where necessary identify mitigation.

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

17.12 As recognised in the report this is likely to impact on the local highway network in Suffolk. The LHA would be keen to understand the proposals in terms of access, whether a few key accesses will be provided with internal access via temporary haul roads or if a large number of accesses will be required off the highway network.

17.13 Construction of a major pipeline through an urban area such as Lowestoft is likely to be highly disruptive. The LHA would have great interest if the pipeline is to be routed along the public highway and what consideration has been given to

the disruption this will cause to road users, businesses and residents. Particularly in the Oulton Broad area where there are significant constrains such as the bascule bridge and the lock.

Barsham Water Treatment Works to Central Service Reservoir (B-C)

17.14 Routing of construction traffic through Halesworth via the A144 would be a concern. Access from the north via the Beccles relief road may be easier but the impacts will need to be assessed before commenting on the acceptability of this route.

Central Service Reservoir to Western Service Reservoir (C-W)

17.15 With the exception of the west end of this corridor the main construction route would need to be via B class roads which are not designed for such use being typically narrow, winding and pass though settlements. Consideration should be given to how the adverse impacts of construction traffic will be managed.

Central Service Reservoir to Saxmundham Water Tower (C-S)

17.16 Whilst close to the A12 to the east the highway links from this road to the corridor are typically narrow, winding and unsuitable for significant numbers of large vehicles. Attention is drawing to the A12/B1119 Rendham junction west of Saxmundham where the LHA is concerned that additional traffic will have an adverse impact on road safety. This area is also under pressure from future development such as residential development south of Saxmundham and the Sealink / LionLink convertor stations to the east.

Saxmundham Water tower to Sizewell (S-S)

17.17 There is significant interaction between this project and infrastructure constructed by Sizewell C (Sizewell Link Road / Main Site Access), Scottish Power EA1(N)/EA2 cable corridor and convertor station and others yet to be consented (Sealink, LionLink). Of concern to the LHA would be any removal of landscaping associated with highway improvements. The cumulative impact of construction traffic associated with all NSIPs will need to be considered, including that on the A12 corridor.

General Comments

Assessment Methodology

17.18 As set out above, a considerable amount of work on traffic impacts has already been undertaken for the local area, and due regards should be paid to the impacts identified within any assessment undertaken, including the potential for cumulative and contiguous impacts and appropriate assessment scenarios.

17.19 The contiguous impacts SCC considers relevant are the repeated closure or diversion of public highways including public rights of way and the increased

duration of the impacts that residents, businesses, and highway users will endure as each NSIP follows the previous one.

17.20 As part of any submission, a Transport Assessment and a separate Environmental Assessment of road traffic should be submitted. SCC considers that early consultation with SCC as the Local Highway Authority to determine the scope of such an assessment will be of benefit to the Applicant.

17.21 Assessment of the impacts on Public Rights of Way (PRoW) should be treated as a specific topic area rather than encompassed within landscaping, social economic or transport sections. This enables a full appreciate of the impacts on the PRoW to be evaluated.

Pre-commencement

17.22 SCC will need to understand impacts associated with all traffic during construction, operation, maintenance, and decommissioning, including freight and workforce movements, and the profile of traffic movements. In accordance with national planning guidance, consideration must be given to achieving as sustainable a transport strategy as possible.

17.23 Due regards should be paid to those areas where mitigation has been identified for the other projects in the locality referred to above, including the potential for complementary mitigation to these schemes.

18 Joint Emergency Planning Unit

Road Network

18.1 The B1119 between Saxmundham and Leiston, plus Sizewell Gap are the main access routes for the Emergency Services responding to a radiation incident at Sizewell B. Additional traffic on this route should be minimised to avoid disruption and any requirement to use this route for Abnormal Indivisible Loads (AILs) should be avoided. Any closure or restrictions on these roads is likely to delay the response and will require detailed consultation and comprehensive traffic management plans.

Sizewell B Emergency Response Arrangements

18.2 The proposed pipeline network to Sizewell C falls within the Sizewell B Detailed Emergency Planning Zone (DEPZ) under Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019, including the area where urgent countermeasures might be advised during any radiation emergency. As a result, Essex and Suffolk Water will be required to develop emergency planning measures to respond to an emergency at the Sizewell B Nuclear Power Station prior to the preparation and construction of the project. To achieve this, Essex and Suffolk Water will liaise directly with the duty holder for Sizewell B offsite radiation emergency arrangements.

Flood Risk

18.3 For each element of the project, all sources of flood risk should be considered, including an allowance for climate change to comply with the National Planning Policy Framework and ensure that they are safe for their lifetime and do not place an increase burden and demand on the Emergency Services and Local Authority. Wherever possible, the project should site components away from those areas at greatest risk of flooding.

Other Projects

18.4 There are plans for several Nationally Significant Infrastructure Projects (NSIPs) interconnectors (EA1N & 2, Sea Link, LionLink) in the vicinity of Friston, with landfall options along the coast. The SWRTS pipeline network between Saxmundham Water Tower and Sizewell will require careful and detailed co-ordination to minimise the cumulative impacts on the community and environment.

19 Local Lead Flood Authority

19.1 The project shall assess the flood risk of the proposed development and shall demonstrate that it will not increase flood risk elsewhere (*during construction and operation)* and provide mitigation where necessary as per National Policy Statement for water resources infrastructure, July 2025.

20 Landscapes

Project Level Design Principles

20.1 SCC welcomes that the Promoter has set Project Level Design Principles but considers that further detail will need to be provided for each principle.

20.2 SCC considers that design principles should be agreed with stakeholders. This should include (but not be limited to):

a. Applying the Mitigation Hierarchy in full, including compensation, for residual impacts that cannot be mitigated.
b. Striving to achieve above 10% Biodiversity Net Gain (BNG) for each parcel and corridor area.
c. Retaining all existing woodlands and copses and leaving a minimum of 25m buffer around them.
d. Retaining all ancient/veteran trees and mature trees, and Important Hedgerows (Hedgerow Regulations 1997) as far as possible.
e. Minimising vegetation losses and avoiding losses for temporary components, such as temporary compounds, accesses and haul roads (including visibility splays). For temporary access temporary traffic management should be the default to minimise vegetation losses to visibility splay requirements.
f. Replacing any mature trees that require removal at a ratio of 3:1.
g. Providing an appropriate buffer between any PRoW and any infrastructure.

h. Providing appropriate buffers of any infrastructure from any lane or road, as required for visual mitigation.
i. Avoiding adverse impacts on the setting of Listed Buildings and Scheduled and Schedulable Monuments.
j. Reducing the cable corridor width to the absolute minimum, when crossing hedge lines and if crossing valley meadows.
k. Considering HDD under important hedgerows and veteran trees and features that are of cultural significance.
l. Designing the infrastructure to maximise environmental benefits.
m. Safeguarding or improving the connectivity of PRoW through the creation of additional routes through the development.
n. Improving connectivity of landscape features, such as woodlands and hedgerows, applying the Suffolk Local Nature Recovery Strategy (LNRS).
o. Minimising external lighting.
p. Securing reinstatement planting, mitigative planting for landscape and visual purpose and planting for BNG through a robust aftercare management scheme, anchored in two-stage control documents, including an adaptive approach to aftercare and long-term management within the parcels and BNG areas.

20.3 Regarding the scheme's Environmental Stewardship principle, SCC considers that the project should aim to protect and enhance all rivers and watercourses it encounters, as well as priority habitats and ancient woodlands, mature trees and sensitive grasslands and meadowlands. The project should also aim to preserve and/or enhance the local landscape character within and outside the Suffolk Coast and Heaths AONB.

20.4 SCC expects that any surface infrastructure is appropriately landscaped so that built elements are successfully integrated into their context and screened from public viewpoints. It is considered that the flat concrete roofs of the reservoirs should be greened and seeded with a pollinator mix. Supported by a suitable mowing regime, this could have considerable biodiversity benefits.

20.5 Where operating within the Suffolk Coast and Heaths AONB Section 85 of the Countryside and Right of Way Act 2000 (CRoW Act) (as amended by the Levelling-Up and Regeneration Act 2023) sets out that relevant authorities and statutory undertakers, in exercising or performing any function that affect National Landscapes in England, "must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

Methodology

20.6 SCC considers that the Methodology for the Landscape and Visual Impact Assessment (LVIA) should be agreed with stakeholders.

20.7 The LVIA needs to be carried out in accordance with the GLVIA 3rd Edition. The LVIA should clearly assess all elements of the scheme, identifying residual impacts in *both* visual and landscape terms. The detailed methodology to be

used for the assessment and the presentation of any visual material should be agreed in writing in advance. This includes:

1. All viewpoint locations.
2. The locations for photomontage/photowire/annotated photographs (types of visual representation), **before** this work is carried out. A rationale should be given.
3. All visual representations should be prepared in accordance with the Landscape Institute's Technical Guidance Note (TGN) 06/19: Visual Representation of development proposals (Sept. 2019).

20.8 *Scope*

4. **Study area, ZTV and Viewpoints** – The study area and location and number of viewpoints shall be informed by a ZTV (Zone of Theoretical Visibility), based on the theoretical visibility of the proposals within the surrounding landscape (due to maximum height of site buildings, stockpiles, and machinery; topography).
5. **Landscape effects:** The LVIA should include an assessment of potential impacts on locally **characteristic physical landscape features** (such as boundary vegetation, trees, water courses) as well as on the local landscape character, including potential impacts on tranquillity and perceptual qualities.
6. **Visual effects:** The LVIA shall include an assessment of potential visual impacts on the wider landscape, Public Rights of Way and residential visual amenity. The decision maker will need to be satisfied that there is no likelihood of significant adverse impacts on residential receptors, including allocated sites and consented but unbuilt dwellings.
7. **Cumulative effects:** The LVIA shall include potential intra- and inter-cumulative impacts resulting from the scheme.
8. **Stages of development** – Assessment of nighttime impacts and the impacts of the construction and decommissioning phases should be included within the scope of the LVIA to enable the decision maker to properly and reasonably understand the effects of the proposal as a whole.
9. **Potential Opportunities:** The LVIA shall include measures to minimise and/or mitigate the adverse impacts of the scheme and integrate it into the character of the wider landscape from the beginning.

20.9 *Baseline Data*

20.10 In addition to Natural England's National Character Area Profiles, SCC expects the Applicant to include the following data sets to inform assessment and design of the proposed scheme:

a. Information of revised ancient and semi-natural woodlands and on hedgerows and canopy cover from Suffolk Biodiversity Information Service (SBIS) (to refine desktop studies on vegetation, prior to ground truthing in the field)
b. Suffolk Landscape Character Assessment
c. Local Landscape Character/ Valued Landscape and Key Views Assessments

d. Neighbourhood Plans
e. Historic late 19th and early 20th century OS Maps to inform landscape and visual mitigation proposals (landscape restoration)
f. Suffolk Historic Landscape Character Assessment https://heritage.suffolk.gov.uk/hlc#Character_Types
g. Suffolk Local Nature Recovery Strategy (LNRS)

20.11 *Vegetation Loss and Protection*

20.12 Tree and Hedgerow Surveys will be required to establish the quantity and quality of vegetation lost to the proposals. It will need to be established whether any of the hedgerows affected are considered Important Hedgerows under the Hedgerow Regulations 1997.

20.13 Arboricultural Impact Assessments and Method Statements will be required. Any retained vegetation will need to be appropriately protected in accordance with BS 5837:2012 Trees in Relation to Design, Demolition, and Construction or its update.

20.14 *Other Matters*

20.15 The proposal may also have archaeological impacts and impacts on the setting of listed buildings that are around the site, which may need to be assessed within the Cultural Heritage Assessment.

20.16 External Lighting will need to be a consideration at all locations of the scheme, both for wildlife and human receptors.

20.17 Given the current Climate Change Crisis, it would seem appropriate to scope a specific assessment on climate effects into the assessment process, rather than out.

Advanced Water Treatment Plant, north of Lowestoft

AWRP 3.1, AWRP 3.2, AWRP 3.3

20.18 The three sites are in close proximity to each other and appear to have similar levels of suitability.

20.19 AWRP1 appears to have the fewest landscape features potentially affected by the proposals; it is also the closest to the Lowestoft Water Recycling Centre and should therefore be seriously considered for being taken forward.

20.20 SCC (Landscape) queries whether land parcels directly north, west and south of the Lowestoft Water Recycling Centre were considered, and if so, why they were not taken forward.

AWRP 5.5

20.21 This site is located in Norfolk. Due to the distance of the site from the Lowestoft Water Recycling Centre, and the resulting requirement of a longer

and potentially more complex pipeline corridor, this does not seem to be the best option.

Provisional Discharge Point at River Waveney

20.22 SCC (Landscape) queries why this discharge location was chosen so far west, and in a very remote location, and whether locations further east along the river have been considered, for example at Lock's Lane, west of Beccles, where infrastructure already exists. This location would also be considerably closer to Barsham Water Treatment Works.

Central Service Reservoir

20.23 All site options selected for Stage 3 are close to Heveningham Hall and Parkland, but all are separated from the Hall and Parkland by tree belts /coverts/woodlands.

20.24 SCC (Landscape) considers that parcels , which do not have suitable access, and can only be reached by a single track or through another land parcel (such as parcels 2, 7, 8, 11, and 12) should not be considered favourably, due to the likely loss of landscape features (such as hedge and trees and the track itself) and degradation of the local landscape character through construction of suitable accesses.

20.25 The open views form Dunwich Lane across parcels 5 and 6 make them also less suitable.

20.26 It seems that the northern half of parcel 1 would have the highest potential, since there is already existing development (Water tower and mast), there is a gap in roadside vegetation, where an access could be created without too much vegetation loss (subject to further assessment), and screening could be provided towards the south and east, towards PRoW 16.

20.27 This would need to be far enough removed (northwards) from the entrance to Heveningham Hall.

20.28 Land Parcel 13 may be the next best alternative to parcel 1, subject to further assessment.

Western Service Reservoir

20.29 SCC (Landscape) considers that the most suitable land parcel out of the 17 options presented would be land parcel 9. This is because it is the only parcel located to the east of the A140, meaning that this busy road corridor would not need to be crossed.

20.30 It seems that it would be relatively easy to provide a satisfactory access to the land parcel, without significant loss of vegetation.

20.31 The visual envelope would be relatively limited between the A140 to the west, the B1077 and Four Oaks Park to the south, residential properties along Rectory Road and the road which bounds the land parcel to the east.

20.32 It is noted that here are a number of Listed Buildings in the vicinity, in particular to the east of the site, and the effects on these and their settings would need to be fully assessed.

20.33 There is only one PROW (number 8), which skirts the site in the south-western corner along the B1077 and A140 roundabout.

20.34 Parcels 1, 2, and 19 should be avoided as they are too close to Thrandeston Conservation Area.

20.35 Parcels 10 and 12 are currently considered by other infrastructure promoters.

Sizewell C Provisional Connection Options

20.36 SCC will provide comments in due course, when further information with regards to Sizewell C Connection Options becomes available. These, and the stretches of corridor leading up to them will need to be carefully assessed.

Corridors

Advanced Water Treatment Plant – River Waveney (A-W)

20.37 Subject to further information and assessments becoming available, SCC (Landscape) considers that A-W4 (possibly in conjunction with A-W4A or A-W4B, subject to detailed assessments) would be expected to be the least damaging approach for the natural environment. With this corridor it may be possible to bypass both the Broads National Park to the north-west and the Suffolk Coast and Heaths AONB the south-east.

20.38 Only towards the western end, when approaching the River Waveney for the proposed discharge, would the corridor infringe into the Broads National Park. SCC (Landscape) considers that relocating the proposed discharge further east could further reduce the length of this corridor and thereby the environmental impacts. By locating it near to existing infrastructure rather than in a very remote location, adverse impacts on the National Park would also be reduced.

Barsham Water Treatment Works - Central Service Reservoir (B-C)

20.39 Based on the information provided by the Promoter, corridor B-C5A does not appear to be an improvement over B-C5. While staying entirely in agricultural fields and avoiding some watercourse crossings, it appears to have serious constraints, such as blocks of woodlands, veteran/ancient trees, Tree Preservation Orders and Priority Habitat located within the corridor. A high-pressure gas pipe would need to be crossed twice. B-C5B also has this problem. Both B-C5A and B-C5B would cross a consented solar farm site.

20.40 Subject to further assessment B-C6 could be a viable alternative to B-C5 in landscape terms. The alternative routings of B-C6A, B-C6B, B-C6C, of which the main benefit appears to be avoiding proximity to Halesworth, will require further assessment. Their varying impacts and effects would need to be weighed up carefully, should B-C6 be chosen over B-C5.

20.41 Central Service Reservoir - Western Service Reservoir (C-W)

20.42 Locating the proposed Western Service Reservoir to the east of the A140 (between Eye Business Park to the south and Brome village to the north) would eliminate the need to cross a major road (A140).

20.43 Based on the information by the Promoter C-W7 is the shortest route and avoids crossing the River Yox at its eastern end. However, it intersects an area of Woodland and Parkland Priority Habitat and crosses several small parcels of woodland. It would need to be carefully assessed in more detail, if any of the alternative options (C-W7A-C-W7D) would reduce the impacts and adverse effects on the natural environment and landscape features, despite being slightly longer. SCC (Landscape) considers that Ancient Woodlands, Priority Habitats and Ancient/ Veteran trees should be avoided as a matter of principle.

20.44 Based on the information provided by the Promoter, SCC (Landscape) cannot support the western part of C-W8. As there is an option for the Proposed Western Service Reservoir east of the A140, the corridor to the west of the A140 between Brome in the north and Thornham Parva in the south cannot be supported, as this is not minimising potential impacts and effects on the natural environment, and therefore does not apply the Mitigation Hierarchy.

20.45 Additionally, SCC (Landscape) cannot support the proposed route to the south of Eye, as this crosses the intricate system of wooded valley meadows to the south-east and east of Eye. In this area the historic field pattern and vegetation pattern are largely intact.

20.46 It would need to be weighed up carefully if the eastern part of C-W8A would be less detrimental for the natural environment that C-W7 (and its sub-options) and whether the eastern most end could be co-located with corridor C-S9. Should this be the case, then a connective corridor between C-W7 and C-W8 may need to be found.

Central Service Reservoir - Saxmundham Water Tower (C-S)

20.47 It appears that, based on the information provided by the Promoter, C-S10, although being the shortest route, faces the most constraints. Should a variation of C-S9 be chosen over C-S10, the alternatives would need to be carefully weighed up through further and more detailed assessment. It should be fully explored how much of the corridor between the Central Service Reservoir and Saxmundham Water Tower can be co-located with corridors to the Western Service Reservoir in the north (corridors C-W7/ C-W8) and corridors towards Sizewell in south (corridors S-S11 and S-S12).

Saxmundham Water Tower - Sizewell (S-S)

20.48 Although I query whether it really is the shortest pipeline corridor, S-S11 appears to combine a number of benefits: It only crosses one railway line,

combines the crossing of the River Fromus with one crossing of the A12, avoiding the sensitive Fromus Valley south of Saxmundham, keeps distance to Leiston Aldeburgh SSSI and Sizewell Marshes SSSI, appears to avoid crossing the Hundred River (only requiring to cross a contributory) and interactions with other potential or consented infrastructure projects, located between Saxmundham and Sizewell.

20.49 This route will cross the A12 twice, but it would appear that the corridors od S-S11 could be co-located with the corridor of C-S10, thereby rationalising land take and reducing adverse environmental impacts and effects.

20.50 Subject to more detailed information and assessments and without prejudice, SCC (Landscape) considers that this might be the best route option and that the benefits of the alternative routes do not appear to outweigh the benefits of this one.

20.51 S-S12, S-S12A and parts of S-S12B would likely intersect with the DCO limits of Sea Link (currently in examination).

20.52 I have made these comments without prejudice to any comments that I or any other SCC officer may wish to make at a later date, when further details about the scheme become available.

21 Public Health

21.1 The consenting and construction of major infrastructure projects such as the Proposed Scheme can have significant and enduring impacts on community wellbeing and in some instances can result in a deterioration in mental health of local residents. Changes to the local environment, including alterations to landscape character, increased noise, vibration, air pollution, light pollution, construction activity, and the presence or introduction of large-scale infrastructure, can diminish residents sense of place, belonging, community identity, and control. There can be uncertainty around the scale, duration and nature of works, as well as anxiety related to potential compulsory purchase[i], anticipated disruption to daily life and access to services, fears around water quality and contamination and the broader cumulative impacts that arise where multiple concurrent NSIPs are present.

21.2 Groups such as children and young people, older adults, people with long term health conditions, carers, those with limited mobility, digitally excluded households, individuals experiencing deprivation, along with other populations at higher risk of poor health outcomes or disproportionate impacts from social, economic, or environmental changes (collectively referred to herein as vulnerable groups) are more likely to be disproportionately affected. As the data below illustrates, vulnerable groups are present at all locations affected by the proposed project. Supporting community resilience and mental health must therefore be an essential component of the project.

21.3 Public Health expect the applicant to demonstrate measures above and beyond policy requirements to protect affected communities. Underpinning this is the need for clear, accessible and inclusive communication. Engagement approaches should align with SCCs Community Engagement and Wellbeing Supplementary Guidance Document[ii] and must reflect the differing levels of digital access, health literacy, and support needs across communities. Transparent communication about possible compulsory purchases, water safety, construction activities, potential risks, and opportunities for involvement in monitoring, mitigation and community benefits will be vital for building and maintaining trust and supporting community resilience.

21.4 A particular concern to Public Health is the potential lack of respite for affected communities from NSIP activity. It is strongly recommended that the applicant plan construction working hours in a way that protects community health and provides meaningful periods of respite. Core working hours should be set to no longer than 08:00–18:00 Monday – Friday and 08:00–13:00 on Saturdays, with no Sunday or Bank Holiday working. Start up and close down periods should be no longer than 1 hour before/after the core working hours and be managed to avoid activities likely to cause disturbance to residents or businesses.

Access

21.5 Construction activities may cause temporary or prolonged disruption to community facilities including schools and educational facilities, Public Rights of Way (PRoW), recreational areas, and transport networks. These alongside access to social infrastructure, green[iii] and blue spaces, and healthcare services[iv] are essential to maintaining physical and mental wellbeing. Such disruption can disproportionately affect vulnerable groups, potentially limiting opportunities for physical activity, social engagement, and timely access to healthcare.

21.6 It is important the applicant identify and evidence the scale and duration of potential access impacts and demonstrate measures to maintain or mitigate disruption. This should include strategies for protecting vulnerable groups, ensuring continuity of services, and supporting equitable access throughout the construction period.

Socioeconomic

21.7 Economic factors including employment, skills development and local business growth are key determinants of healthy. The project may provide valuable opportunities for local employment, apprenticeships, and supply chain growth, which can contribute positively to community wellbeing and long-term health outcomes. However, economic activity associated with large infrastructure projects also carries potential risk. Workforce competition, disruption to existing businesses, impacts on tourism, and reduced accessibility during construction can disproportionately affect people on lower income and vulnerable groups.

These effects can exacerbate health inequalities if benefits are not carefully planned and targeted. Ensuring that economic gains are accessible, meaningful and equitably distributed, particularly for disadvantaged communities, will be essential to securing a positive legacy.

21.8 Public Health expect the Applicant to provide robust assessments and evidence to underpin all assumptions regarding workforce, supply chain, and business impacts. This should include consideration of how recruitment practices and local economic activity intersect with other topic areas such as Traffic and Transport. Early reflection of these findings across the projects assessments will support a greater understanding of potential public health implications and inform mitigation measures.

Noise and Vibration

21.9 Noise and vibration from construction activities can have direct impacts on physical[vivii] and mental[viii] wellbeing. Prolonged exposure to elevated noise levels and vibration can cause sleep disturbance, stress, anxiety, and reduced quality of life, particularly for vulnerable groups. Communities already experiencing concurrent NSIPs in Suffolk may face cumulative impacts from overlapping sources of noise, vibration, and disruption, increasing the risk of mental health impacts and widening health inequalities. Public Health therefore considers careful management of noise and vibration essential to protecting community wellbeing.

21.10 Public Health advises close collaboration between the applicant and East Suffolk Councils Environmental Health Officers to ensure effective planning, including consideration for monitoring and mitigation of impacts.

Artificial Lighting

21.11 The introduction of any artificial lighting, for example, if security lighting is used on a 24-hour basis, can disrupt natural circadian rhythms[ix], contribute to sleep disturbance and increase the risk of anxiety and depressive symptoms, especially among vulnerable groups. Exposure to excessive or poorly controlled light at night is associated with adverse mental health outcomes and should be considered as part of the projects assessment and planned in collaboration with East Suffolk Councils Environmental Health Officer.

Emergency Preparedness

21.12 The applicant should carry out appropriate assessments and planning to demonstrate robust emergency preparedness and response plans, developed in close collaboration with other NSIPs underway or planned in the area, local authorities, and health services. These plans should address a range of potential incidents, including construction accidents, contamination events, major service disruptions, and flood risks.

21.13 Public Health considers it essential that plans specifically account for the potential impacts on community health and wellbeing, particularly for vulnerable groups. Emergency response arrangements should ensure timely communication, continuity of access to essential services, and rapid mitigation of risks to physical and mental health.

21.14 Plans should consider cumulative risks arising from the overlap of multiple NSIPs in the region, including potential simultaneous demands on emergency services and healthcare systems.

Water Quality and Safety

21.15 Given the project is focused on water recycling, transfer and storage, safeguarding water quality throughout construction and operation will be essential to protect public health. The applicant should provide detailed information on measures to prevent contamination and spill of materials (e.g. biobeads), including monitoring, treatment, and rapid response protocols in the event of any water quality issues. It is also important to communicate clearly and transparently with communities, addressing concerns about the safety of drinking water and explaining the measures in place to ensure water quality, so that public confidence and wellbeing are maintained.

Air Quality

21.16 Dust, transport and machinery emissions during the construction phase of any project have a direct and immediate impact on local air quality. From a Public Health perspective there is no safe level of air pollution[x]. Evidence[xi] shows both long-term exposure (over years) and short-term exposure (over hours) to low levels of air pollution can impact health, with poor air quality linked to a range of conditions from asthma and lung cancer to heart disease and dementia.

21.17 Air pollution impacts everyone but there are some groups more vulnerable to its effects including children, pregnant women and older people. It also disproportionately impacts people with pre-existing respiratory and cardiovascular conditions.

21.18 Suffolk has a statistically significantly higher prevalence of Chronic Obstructive Pulmonary Disease (COPD[xii]) and asthma[xiii] in many of its districts than the England average and that includes in East Suffolk (Asthma prevalence in East Suffolk is 7.8% compared to an England average of 6.5%; COPD prevalence in East Suffolk is 2.5% compared to an England average of 1.8%). The impacts on vulnerable Suffolk residents, and on the health and care system, are being seen in Suffolk hospitals, particularly through the increased admissions for respiratory conditions in the winter months[xiv]. This becomes more significant when the cumulative impacts from the other developments in the area are taken into consideration.

21.19 Public Health advises close collaboration between the applicant and East Suffolk Council's Environmental Health Officers to ensure effective planning

including consideration for monitoring and mitigation of the air quality impacts resulting from the construction phase in coordination with the other NSIPs in the area.

Climate Resilience

21.20 Suffolk is one of the driest parts of the UK, with lower than average rainfall[xv]. Population growth and increased demand mean water resources in Suffolk will be under severe pressure in future especially in a changing climate. Water scarcity can have a direct impact on public health leading to increases in spread of infection such as skin and eye infections; food shortages and impacts on wellbeing[xvi]. Public Health therefore recognise the need to ensure that our infrastructure is climate resilient and our water supply safeguarded.

21.21 Public Health is currently developing an approach to better understand how climate change is already influencing, and will increasingly impact, the health and wellbeing of Suffolk's population. Planning for the proposed project should take account of any recommendations from this work to ensure alignment with emerging public health priorities.

Nature and Biodiversity

21.22 Access to nature, green and blue space is essential to health and wellbeing with evidenced benefits including improved mental health, reduced social isolation, boosted physical activity and improved cardiovascular health[xvii].

21.23 Beyond individual and population health, green and blue spaces are vital for climate resilience. They can cool towns and cities, improve air quality, reduce flood risk, and help communities adapt to the challenges of a changing climate[xviii]. As Suffolk responds to the climate emergency, nature-based solutions offer a powerful and practical way to protect both people and the planet.

21.24 With these benefits in mind, Public Health expects, in addition to any statutory biodiversity and nature recovery commitments, that inequalities in green space access and provision are taken into consideration to ensure vulnerable groups are not disproportionately impacted by the proposed project. We would encourage that through this project nature is not just preserved but actively utilised and enhanced to improve the health and wellbeing of the Suffolk communities impacted.

Cumulative Impacts

21.25 Cumulative pressures associated with overlapping NSIPs can include workforce displacement, increased traffic and congestion, access constraints to green and blue spaces and social infrastructure, pressure on local healthcare systems, heightened housing demand, and repeated disruption to daily life of affected communities. Additional stressors such as noise, vibration, dust, reduced air quality, light pollution, community severance, and uncertainty about future development can further contribute to mental and physical health impacts.

Without proactive management, these combined pressures have the potential to erode community wellbeing, undermine social cohesion, and widen existing health inequalities.

21.26 The project sits within a wider landscape of significant infrastructure development in Suffolk. With multiple NSIPs currently in construction or planning, including Sizewell C, Sea Link, LionLink, off shore wind projects, and others. The combined effects on local communities, businesses, essential services, and overall community resilience are a major concern to Public Health. This is particularly acute in the southeastern aspect of the proposal, where the pipeline corridors between the Central Reservoir and Sizewell C intersect an area already experiencing substantial NSIP activity. Cumulative impacts and community wellbeing must therefore form a core component of the Applicants assessments, with a clear demonstration of how overlapping pressures will be mitigated and how community resilience will be supported.

21.27 A large amount of information and data is available from existing Suffolk NSIP projects, and this should be considered as part of the development of the proposal.

Site Specific Data and Insight:

21.28 Public Health have drawn upon Lower Super Output Area (LSOA) datasets from Local Insight[xix] (profile generated 13/11/2025) to assess the site areas as far as practically possible, including those extending into Norfolk where the scheme footprint necessitates cross boundary analysis.

Advanced Water Recycling Plant (AWRP) – LSOA Data

21.29 The estimated population within the LSOA is 5,220.

21.30 32.2% are aged 65+, much higher than the proportion of people aged 65+ in Suffolk (23.9%) and England (18.6%). There are 419 pensioners living alone in the area, representing 17.74% of the 65+ population. 700 pensioners in the LSOA have bad or very bad health (42.87%). This proportion is similar to the proportion in England (42.08%) but higher than the proportion in Suffolk (38.82%).

21.31 24.87% of households in the LSOA have access to green space. This is higher than the proportion of households with access to green space in England (18.26%) and higher than the proportion in Suffolk (16.24%).

21.32 11.5% of households in the area have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and less than the proportion without access to a car or van in Suffolk (15.91%).

21.33 The average travel time to the nearest GP is 25 minutes (GP travel time throughout, is based upon walking and/or public transport). This is longer than the travel time in England (13 minutes) and longer than Suffolk (18 minutes).

21.34 The LSOA has a rank of 3,484 on the 2025 Geographical Barriers Sub-Domain (Indices of Deprivation). This means that area has greater levels of challenges in accessing key services relative to England (17,061) and greater levels relative to Suffolk (9,630).

21.35 The area has a Priority Places for Food Index rank of 11,953. This means that the LSOA has higher levels of food insecurity than England (16,898) and higher levels of food insecurity than Suffolk (18,392).

21.36 The overall Community Needs Index (CNI) rank for the LSOA is 6,964. This means the area has higher levels of community need than England (17,040) and higher levels of community need than Suffolk (9,568).

21.37 The Digital Exclusion Risk Index (DERI) score is 3.40. This means the LSOA has a higher level of digital exclusion risk than England (3.00) and has a higher level than Suffolk (3.13).

21.38 The proportion of households in the LSOA in fuel poverty has increased, from 7.6% in 2013 to 10.08% in 2023. This latest figure is lower than England (11.4%) and lower than Suffolk (11.14%).

21.39 14.38% of the working-age population in the area are receiving Personal Independence Payments (PIP). This is higher than the proportion in England (9.85%) and higher than the proportion in Suffolk (9.58%).

21.40 15.64% of people in the area are recorded as having depression. This is higher than the proportion in England (14.45%) and similar to the proportion in Suffolk (14.76%).

21.41 17.88% of people in the LSOA are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and similar to the proportion in Suffolk (18.01%).

21.42 16.12% of people are recorded as obese in the area. This is higher than the proportion in England (14.06%) and higher than the proportion in Suffolk (14.58%).

21.43 The LSOA has a 2025 IMD rank of 16,903. This means the area has lower levels of deprivation compared to England (16,746) but higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data above:

Demographic vulnerability and ageing population

21.44 The LSOA contains a higher proportion of older residents than both Suffolk and England, including a notable number of pensioners living alone. This population group is more likely to experience challenges related to mobility, digital exclusion, and social isolation, and may be more sensitive to construction related disruption, noise, traffic changes, air pollution and loss of amenity. The

data suggests that any interruption to accessible spaces, routine routes, or social and healthcare infrastructure may disproportionately affect this group.

Existing health needs and long-term conditions

21.45 The area shows higher than average prevalence of long-term conditions, including obesity, depression, and high blood pressure. Together with elevated PIP claims, this indicates a population with a mixture of physical and mental health vulnerabilities making them more susceptible to health impacts from construction including air pollution, noise and vibration. These factors may also reduce residents' resilience to environmental stressors or disruption associated with construction activities and may heighten the importance of protecting access to opportunities for physical activity and social connection.

Access to green and blue space

21.46 Although access to green space is better than county and national figures, the community's reliance on these spaces for wellbeing, especially given the older demographic, means that temporary loss, reduced accessibility, or perceived disturbance of these areas could carry meaningful health consequences. These spaces may be essential for low-cost physical activity and mental restoration for residents with limited mobility or financial constraints.

Transport reliance and access barriers

21.47 Whilst car ownership is relatively high, the area contains a proportion of households without access to private transport, amplified by longer travel times to GPs and higher deprivation in geographical access. This raises concerns that construction traffic, diversions, or temporary loss of routes could further constrain access to essential services, particularly social and healthcare infrastructure.

Inequalities and vulnerability to disruption

21.48 Indicators such as the Community Need Index, Digital Exclusion Risk, and Food Insecurity ranking suggest that some households are already facing multiple structural barriers. These vulnerabilities may compound the effects of disruption to transport, digital communications, or access to local amenities. Populations already facing disadvantage may be more likely to experience stress, reduced access to support, or deterioration in wellbeing if construction activities interfere with key aspects of daily life.

Health service access and capacity considerations

21.49 Longer travel time to GPs indicates that healthcare access is already stretched geographically. Additional temporary pressure (e.g. through construction related physical and mental health impacts connected to the project) could be more significant in this setting. Local health services may have limited flexibility to

absorb further demand, a thorough and cautious assessment of local healthcare capacity will be critical, supported by proactive and coordinated planning with providers to ensure resilience and minimise risks to community health.

Fuel poverty and cost of living pressures

21.50 Although fuel poverty is lower than regional and national averages, it has increased over time. Any disruption affecting household running costs, travel costs, or access to supportive community assets could impose additional strain on vulnerable households.

Community resilience and social infrastructure

21.51 Higher prevalence of people living alone, limited digital access, and moderate deprivation indicators suggest the need for careful, inclusive, and accessible engagement approaches. Effective communication about impacts, timelines, and support during construction will be particularly important for this community, given the mix of ageing, digitally excluded, and potentially socially isolated residents.

Western Service Reservoir (WSR) – LSOA data

21.52 The estimated population within the LSOA is 4,730 people

21.53 The overall proportion of people aged 65+ in the area is 31.01%. This is higher than the proportion of people aged 65+ in Suffolk (23.9%) and higher than the proportion of those aged 65+ in England (18.61%). The proportion of those aged 65+ receiving Pension Credit in the area (7.5%) is similar to the proportion of claimants in Suffolk (7.79%) and lower than the proportion of claimants in England (11.15%).

21.54 There are 345 pensioners living alone in the LSOA, 16.93% of the population aged 65+ here. This is higher than the proportion in Suffolk (14.81%) and higher than the proportion in England (12.81%). 546 pensioners have bad or very bad health (37.27%). This proportion is lower than the proportion in Suffolk (38.82%) and lower than the proportion in England (42.08%).

21.55 On average, 18.37% of households in the area have access to green space. This is higher than the proportion of households with access to green space in Suffolk (16.24%) and similar to the proportion in England (18.26%).

21.56 10.22% of households in the area have no access to a car or van. This is less than the proportion without access to a car or van in Suffolk (15.91%) and less than the proportion without access to a car or van in England (23.54%).

21.57 The average travel time to the nearest GP is 19 minutes. This is similar to the travel time in Suffolk (18 minutes) and longer than England (13 minutes).

21.58 The LSOA has a rank of 3,692 on the 2025 Geographical Barriers Sub-Domain. This means that the area has greater levels of challenges in accessing key

services relative to Suffolk (9,630) and greater levels relative to England (17,061).

21.59 The area has a Priority Places for Food Index rank of 9,655. This means that the LSOA has higher levels of food insecurity than Suffolk (18,392) and higher levels of food insecurity than England (16,898).

21.60 The LSOA has an overall Community Needs Index rank of 14,612. This means the area has lower levels of community need than Suffolk (9,568) and higher levels of community need than England (17,040).

21.61 The Digital Exclusion Risk Index (DERI) score is 3.21. This means the area has a similar level of digital exclusion risk to Suffolk (3.13) and has a higher level than England (3.00).

21.62 The proportion of households in the area that are in fuel poverty has increased, from 9.5% in 2013 to 13.13% in 2023. This latest figure for the LSOA is higher than in Suffolk (11.14%) and higher than in England (11.4%).

21.63 8.11% of children aged 4-5 in the area were categorised as obese or severely obese between 2021 to 2024. This is lower than the rate in Suffolk (8.77%) and lower than the rate in England (9.64%). 12.38% of people are recorded as obese in the area. This is lower than the proportion in Suffolk (14.58%) and lower than the proportion in England (14.06%).

21.64 8.54% of the working age population are receiving PIP. This is lower than the proportion in Suffolk (9.58%) and lower than the proportion in England (9.85%).

21.65 The proportion of people disabled under the Equality Act with their day-to-day activities limited a lot is 8.25%. This is higher than the proportion in Suffolk (7.24%) and higher than the proportion in England (7.33%).

21.66 10.1% of people in the LSOA are recorded as having depression. This is lower than the proportion in Suffolk (14.76%) and lower than the proportion in England (14.45%).

21.67 18.02% of people are recorded as having high blood pressure. This is similar to the proportion in Suffolk (18.01%) and higher than the proportion in England (15.5%).

21.68 The LSOA has an IMD rank of 19,501. This means the area has lower levels of deprivation compared to Suffolk (17,877) and lower levels of deprivation compared to England (16,746).

Public Health considerations based on the data:

Demographic vulnerability and ageing population

21.69 The LSOA has a substantially higher proportion of older residents compared to Suffolk and England, including a notable number of pensioners living alone. While fewer pensioners report bad or very bad health compared to wider benchmarks, this demographic profile still indicates a population that may be

more sensitive to disruptions affecting mobility, routine travel patterns, or access to local services and impacts relating to poor air quality. Older adults living alone may face particular challenges during construction periods, especially if access routes, community assets, or information channels are disrupted.

Existing health needs and long-term conditions

21.70 The prevalence of certain long-term conditions, such as high blood pressure, is similar to or slightly higher than national averages. Although levels of depression and adult obesity are lower than in Suffolk and England, the proportion of residents with significant limitations to day-to-day activities is higher. This suggests the presence of a cohort with complex health needs who may be less able to adapt to changes in their environment or to navigate diversions, increased traffic, or altered access arrangements during construction.

Access to green and blue space

21.71 Access to green space is broadly in line with regional and national levels. However, given the older age profile and the presence of residents with limiting conditions, these spaces still likely play a valuable role in maintaining physical activity, mental wellbeing, and opportunities for informal recreation. Any changes that affect ease of access, perceived safety, or enjoyment of these spaces may have disproportionate effects on those who rely most on them.

Transport reliance and access barriers

21.72 Whilst car ownership in the area is relatively high, a proportion of residents do not have access to private transport. Combined with longer than average GP travel times, this suggests that residents without cars may already face challenges in accessing essential services. Construction related traffic, temporary diversions, or changes to public rights of way could further limit accessibility for these groups, particularly those with mobility limitations or health conditions.

Inequalities and vulnerability to disruption

21.73 Indicators related to food insecurity, digital exclusion risk, and disability suggest that some households within the LSOA experience underlying vulnerabilities. These characteristics may heighten sensitivity to disruption, stress, or uncertainty associated with major infrastructure works. Households with limited digital skills, in particular, may struggle to access information or updates unless communication is delivered through multiple accessible channels.

Health service access and capacity considerations

21.74 Travel time to a GP is above the national average, indicating that primary care access is already constrained by geography. Although the area has lower levels

of deprivation overall, existing access barriers may limit residents' ability to seek timely care if construction activities lead to additional physical or mental health impacts. Proactive coordination with local healthcare providers will therefore be important to ensure that any additional pressures are anticipated and managed.

Fuel poverty and cost of living pressures

21.75 Fuel poverty in the LSOA has risen over the past decade and is now higher than both Suffolk and England, suggesting that a portion of households may be particularly exposed to financial strain. Any project related impacts that increase transport expenditure, energy use, or general living costs may exacerbate these pressures for affected households.

Community resilience and social infrastructure

21.76 Lower levels of overall deprivation are balanced by the presence of residents with disabilities, limited digital access, and high proportions of older people living alone. These characteristics signal a need for engagement approaches that are inclusive, proactive, and sensitive to the varying needs of the local population. Clear communication regarding timelines, potential impacts, and available support will be important to maintain trust and minimise stress or anxiety during construction.

Central Service Reservoir (CSR) – LSOA data

21.77 The estimated population within the LSOA is 2,135 people

21.78 The proportion of people aged 65+ in the LSOA is 33.82%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%). The proportion of those aged 65+ receiving Pension Credit (6.37%) is lower than the proportion of claimants in England (11.15%) and in Suffolk (7.79%).

21.79 There are 157 pensioners living alone the area, 16.19% of the population aged 65+ here. This is higher than the proportion in England (12.81%) and Suffolk (14.81%).

21.80 The area has an IoD housing in poor condition score of 0.68. This is higher than the score in England (0.16) and higher than the score in Suffolk (0.22).

21.81 6.19% of households have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and Suffolk (15.91%).

21.82 In the LSOA, the average travel time to the nearest GP is 93 minutes. This is longer than the travel time in England (13 minutes) and longer than Suffolk (18 minutes).

21.83 The area has a rank of 115 on the 2025 Geographical Barriers Sub-Domain. This means the LSOA has greater levels of challenges in accessing key services relative to England (17,061) and greater levels of relative to Suffolk (9,630).

21.84 The LSOA has a Priority Places for Food Index rank of 8,057. This means the area has higher levels of food insecurity than England (16,898) and Suffolk (18,392).

21.85 The are as an overall Community Needs Index rank of 7,297. This means the LSOA has higher levels of community need than England (17,040) and higher levels of community need than Suffolk (9,568).

21.86 In the LSOA, the Digital Exclusion Risk Index (DERI) score is 3.57. This means the area has a higher level of digital exclusion risk than England (3.00) and Suffolk (3.13).

21.87 In the area, the proportion of households in fuel poverty has increased, from 15.33% in 2013 to 15.96% in 2023. This latest figure is higher than in England (11.4%) and Suffolk (11.14%).

21.88 11.11% of children aged 4-5 were categorised as obese or severely obese in the LSOA between 2021 to 2024. This is higher than the rate in England (9.64%) and Suffolk (8.77%). 13.61% of people are recorded as obese in the area. This is similar to the proportion in England (14.06%) and Suffolk (14.58%).

21.89 7.49% of the working age population in the LSOA are receiving PIP. This is lower than the proportion in England (9.85%) and lower than the proportion in Suffolk (9.58%).

21.90 The proportion of people disabled under the Equality Act with their day-to-day activities limited a lot is 6.21%. This is lower than the proportion in England (7.33%) and Suffolk (7.24%).

21.91 13.95% of people in the area are recorded as having depression. This is similar to the proportion in England (14.45%) and similar to the proportion in Suffolk (14.76%).

21.92 19.26% are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and higher than the proportion in Suffolk (18.01%).

21.93 The LSOA has an IMD rank of 12,060. This means that the area has higher levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

Demographic profile and ageing population

21.94 The CSR LSOA has a significantly higher proportion of older residents compared with both Suffolk and England. Although Pension Credit uptake is relatively low - which may suggest fewer financial vulnerabilities among older residents, there remains a notable number of pensioners living alone. This group may be particularly susceptible to disruption, changes in travel routes, increased construction activity and impacts relating to poor air quality especially if they rely on predictable access to local amenities, green space, or support networks.

Existing health needs and long-term conditions

21.95 Levels of bad or very bad health among pensioners are lower than national and county benchmarks, indicating comparatively better health among the older population. However, a higher than average rate of high blood pressure suggests a population with underlying cardiovascular risk, who may be more affected by stress, disruption, or changes in opportunities for daily physical activity. Childhood obesity is higher than local and national averages, indicating existing challenges with healthy weight and potentially reflecting limited access to affordable healthy food and recreation for children and families.

Housing condition and environmental vulnerability

21.96 A notably high score for housing in poor condition suggests that a proportion of households may be living in homes that are less resilient to environmental disturbance, vibration, noise, or dust. Poor condition housing may exacerbate the perceived or actual impact of construction activity, particularly for vulnerable groups including older adults or families with children. This may influence both physical health (e.g. respiratory issues) and mental wellbeing if deterioration or intrusion is felt more acutely in substandard homes.

Transport reliance and access to essential services

21.97 Car ownership levels are relatively high, indicating a degree of transport independence for many households. However, the exceptional travel time to the nearest GP that is far above Suffolk and England averages signals a significant barrier to accessing healthcare. The low geographical barriers rank that indicates high barriers to key services further reflects this. Any temporary disruption to transport routes, increased congestion or reduced reliability of public or community transport may disproportionately affect residents already facing long travel times to medical appointments and key services. These factors indicate that healthcare access is already stretched geographically. Additional temporary pressure (e.g. through construction related physical and mental health impacts relating to the project) could be more significant in the area. Local health services may have limited flexibility to absorb further demand, a thorough and cautious assessment of local healthcare capacity will be critical, supported by proactive and coordinated planning with providers to ensure resilience and minimise risks to community health.

Food insecurity and cost-of-living pressures

21.98 The Priority Places for Food Index suggests higher levels of food insecurity relative to both England and Suffolk. Combined with rising fuel poverty, this indicates households experiencing cost of living pressures that may compound vulnerability to project related impacts. Increased travel requirements, reduced access to shops - particularly those that provide healthy food options, or increased heating or energy demands due to disturbance could exacerbate existing financial strain.

Digital exclusion and ability to access information

21.99 A higher than average Digital Exclusion Risk Index suggests that a proportion of residents may have difficulty accessing online information or digital engagement platforms. This may pose challenges if project updates, notifications, or consultations rely heavily on digital communication. Residents in digitally excluded households may require more direct, accessible, and non-digital communication to ensure equal access to information.

Disability, general health, and resilience

21.100 Although disability rates and levels of severe limitation are lower than national and county benchmarks, this does not negate the presence of residents with significant health needs. Some may be particularly affected by changes to accessibility, noise levels, or stress associated with major construction. Overall levels of very bad health are low, but the combination of an ageing population, high blood pressure prevalence, and housing condition issues indicates a mixed resilience picture that should be recognised in project planning.

Deprivation and community need

21.101 The LSOA shows higher levels of deprivation than both Suffolk and England, as reflected in its IMD rank and overall CNI profile. Higher deprivation can correlate with reduced capacity to maintain wellbeing during large infrastructure projects, making accessible communication, continuity of services, and minimisation of disruption particularly important.

Pipeline A-W – LSOA data

21.102 The estimated population within the LSOA is 58,734 people

21.103 The overall proportion of people aged 65+ is 28.14%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%). 1,325 people in the LSOA are in receipt of Pension Credit.. The proportion of those aged 65+ receiving Pension Credit (8.02%) is lower than the proportion of claimants in England (11.15%) and similar to the proportion of Suffolk (7.79%).

21.104 The LSOA has an IoD housing in poor condition score of 0.21. This is higher than the score in England (0.16) and lower than the score in Suffolk (0.22).

21.105 On average, 10.91% of households in the area have access to green space. This is lower than the proportion of households with access to green space in England (18.26%) and Suffolk (16.24%).

21.106 12.95% of households have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and Suffolk (15.91%).

21.107 The average travel time to the nearest GP is 18 minutes. This is longer than the travel time in England (13 minutes) and the same as Suffolk (18 minutes).

21.108 The LSOA has a Priority Places for Food Index rank of 14,623. This means the LSOA has higher levels of food insecurity than England (16,898) and Suffolk (18,392).

21.109 The area has an overall CNI rank of 6,744. This means the LSOA has higher levels of community need than England (17,040) and higher levels of community need than Suffolk (9,568).

21.110 The Digital Exclusion Risk Index (DERI) score is 3.34 in the LSOA. This means the area has a higher level of digital exclusion risk than England (3.00) and Suffolk (3.13).

21.111 The proportion of households in fuel poverty has increased in the area, from 9.19% in 2013 to 10.58% in 2023. This latest figure is lower than in England (11.4%) and Suffolk (11.14%).

21.112 9.88% of children aged 4-5 were categorised as obese or severely obese in the LSOA between 2021 to 2024. This is higher than the rate in England (9.64%) and Suffolk (8.77%).16.66% of people are recorded as obese in the area. This is higher than the proportion in England (14.06%) and Suffolk (14.58%).

21.113 11.66% of the working-age population in the LSOA are receiving PIP. This is higher than the proportion in England (9.85%) and Suffolk (9.58%).

21.114 16.98% of people are recorded as having depression. This is higher than the proportion in England (14.45%) and Suffolk (14.76%).

21.115 19.3% of people are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and Suffolk (18.01%).

21.116 The LSOA has an IMD rank of 17,462. This means that the area has lower levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

Demographic profile and ageing population

21.117 The LSOA has an older population profile than both Suffolk and England, indicating a potentially higher proportion of residents who may be sensitive to disruption during construction activity and impacts relating to poor air quality. Although Pension Credit uptake is relatively low, suggesting fewer financial vulnerabilities among older residents overall, the absolute number of older people is large due to the high population size. This demographic may have increased needs for clear communication, predictable access routes, and continuity of routine services.

21.118 Access to green space and opportunities for physical activity

21.119 Household access to green space is lower than local and national averages. This suggests that many residents rely on the wider public realm, such as footpaths, parks, or informal open spaces for physical activity and wellbeing. Disruption to these spaces through pipeline construction, temporary diversions, or reduced access may disproportionately affect populations already limited in local opportunities for recreation. This is particularly relevant given the higher than average rate of adult and child obesity.

21.120 Housing and living conditions

21.121 The areas score for housing in poor condition sits between the England and Suffolk averages, indicating some pockets of housing vulnerability but not extreme levels. Nevertheless, for residents living in poorer quality housing, exposure to noise, dust, or vibration may be felt more acutely and could exacerbate existing health issues. This is relevant in areas with high population density or where construction activities interact with residential zones.

21.122 Transport reliance and service accessibility

21.123 Although car ownership is higher than national and county benchmarks, suggesting relative mobility for most residents, this is counterbalanced by the very large population spread across the LSOA. There will likely be groups such as low income households, disabled residents, or older adults who rely on public or community transport. Given that the average travel time to a GP is already at the upper end of reasonable access, any temporary disruptions to roads or public transport services could create barriers to healthcare access for at risk groups. Consideration of local health service capacity and proactive engagement with providers will be important to minimise impacts on service accessibility and continuity of care during construction.

21.124 Food insecurity and cost-of-living vulnerabilities

21.125 Priority Places for Food Index data indicates higher food insecurity than both Suffolk and England. Combined with slowly rising fuel poverty, this points to pockets of socio-economic vulnerability. Residents experiencing food insecurity or energy stress may be less resilient to unplanned changes, additional travel costs, or service disruption. The project should therefore be mindful of potential financial strain resulting from construction impacts.

21.126 Digital exclusion and access to information

21.127 Digital exclusion risk is higher than national and county averages, suggesting that online only or predominantly digital communication may not reach all residents equally. Ensuring accessible, multi-channel engagement is particularly important for a large and diverse population, especially where construction phases may evolve quickly or require residents to respond to changes in access or service routes.

21.128 Health status, long term conditions, and vulnerability

21.129 Rates of obesity (both adult and child), depression, and high blood pressure are higher than national and Suffolk levels, indicating greater prevalence of conditions that may influence vulnerability to stress, disruption, and reduced opportunities for physical activity. The higher rate of PIP receipt further suggests that a notable proportion of residents live with disabilities or chronic health conditions. These groups may require more predictable access, reduced noise and disturbance, and sensitive planning around temporary diversions or closures.

21.130 Deprivation and community need

21.131 The area shows lower deprivation than England overall but higher than Suffolk, with a correspondingly high Community Needs Index rank. This indicates a complex socio economic profile, with some communities likely to face compounded disadvantage when experiencing disruption. For residents with existing economic stressors, multiple long-term conditions, or limited access to green space, the project's impacts may be disproportionately felt without proactive consideration.

Pipeline B-C – LSOA data

21.132 The estimated population within the LSOA is 15,635 people.

21.133 The overall proportion of people aged 65+ in the LSOA is 34%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%).

21.134 There are 1,370 pensioners living alone in the area, 18.9% of the population aged 65+ here. This is higher than the proportion in England (12.81%) and Suffolk (14.81%). Additionally, 1,816 pensioners have bad or very bad health (35.18%). This proportion is lower than the proportion in England (42.08%) and Suffolk (38.82%).

21.135 The proportion of the population aged 65+ who are claiming Pension Credit has decreased, from 12.42% in Feb-2015 to 6.32% in Feb-2025. This latest figure is lower than the proportion in England (11.15%) and Suffolk (7.79%).

21.136 336 people are in receipt of Pension Credit. Of these. The proportion of those aged 65+ receiving Pension Credit (6.32%) is lower than the proportion of claimants in England (11.15%) and Suffolk (7.79%).

21.137 The LSOA has an IoD housing in poor condition score of 0.46. This is higher than the score in England (0.16) and higher than the score in Suffolk (0.22).

21.138 On average, 16.02% of households in the LSOA have access to green space. This is lower than the proportion of households with access to green space in England (18.26%) and similar to the proportion in Suffolk (16.24%).

21.139 The average travel time to the nearest GP is 40 minutes. This is longer than the travel time in England (13 minutes) and longer than Suffolk (18 minutes).

21.140 In 2021, 10.59% of households in the LSOA had no access to a car or van. This is less than the proportion without access to a car or van in 2011 (12.3%).

21.141 The LSOA has a Priority Places for Food Index rank of 5,359. This means that the area has higher levels of food insecurity than England (16,898) and Suffolk (18,392).

21.142 The area has an overall CNI rank of 6,028. This means that the LSOA has higher levels of community need than England (17,040) and Suffolk (9,568).

21.143 In the LSOA, the proportion of households in fuel poverty has increased, from 11.58% in 2013 to 14.57% in 2023. This latest figure for the area is higher than in England (11.4%) and Suffolk (11.14%).

21.144 10.23% of children aged 4-5 were categorised as obese or severely obese in the LSOA between 2021 to 2024. This is higher than the rate in England (9.64%) and Suffolk (8.77%).14.32% of people are recorded as obese. This is similar to the proportion in England (14.06%) and Suffolk (14.58%).

21.145 The proportion of people disabled under the Equality Act with their day-to-day activities limited a lot is 7.95%. This is higher than the proportion in England (7.33%) and Suffolk (7.24%).

21.146 15.59% of people are recorded as having depression. This is higher than the proportion in England (14.45%) and similar to the proportion in Suffolk (14.76%).

21.147 19.9% of people are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and higher than the proportion in Suffolk (18.01%).

21.148 The LSOA has an IMD rank of 13,726. This means that the area has higher levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

21.149 Demographic profile and ageing population

21.150 The LSOA has a notably higher proportion of older residents compared to Suffolk and England, with a substantial number of pensioners living alone. While the proportion of older people claiming Pension Credit is relatively low, the combination of an ageing population and a high number of older residents living alone may increase sensitivity to disruptions in access, services, local amenities during construction activity and impacts relating to poor air quality. Maintaining safe, predictable access for these groups will be important.

21.151 Existing health needs and long-term conditions

21.152 A significant number of pensioners report bad or very bad health, though this is lower than county and national averages. Rates of high blood pressure,

depression, and adult and child obesity are higher than or similar to benchmarks, indicating a population with a mix of physical and mental health vulnerabilities. These conditions may reduce resilience to environmental stressors and highlight the importance of protecting opportunities for physical activity and social engagement during project works.

21.153 Housing and living conditions

21.154 The area has a higher than average housing in poor condition score, suggesting that some households may be more sensitive to noise, vibration, dust, or other construction related disturbances. This could exacerbate the experience of stress or discomfort, particularly for older residents or those with chronic health conditions.

21.155 Access to green space and opportunities for recreation

21.156 Household access to green space is slightly below national averages but comparable to Suffolk. Given the older population and higher prevalence of health conditions, these spaces may be particularly important for informal physical activity and wellbeing. Temporary disruption or reduced access could therefore have meaningful effects on community health.

21.157 Transport reliance and access to services

21.158 Car ownership is relatively high, but 10.59% of households have no access to a car. Travel times to the nearest GP are considerably longer than national and county averages, highlighting pre-existing barriers to healthcare access. Temporary disruptions to roads, footpaths, or transport networks during construction could exacerbate these challenges, particularly for vulnerable groups.

21.159 Inequalities, socio economic vulnerability, and food insecurity

21.160 Food insecurity, fuel poverty, and overall community need are higher than county and national benchmarks. Rising fuel poverty, combined with high levels of deprivation, suggests that some households may be particularly vulnerable to additional stress or costs associated with project activities. Residents already experiencing disadvantage may be disproportionately affected by disruptions to transport, services, or access to essential resources.

21.161 Digital exclusion and access to information

21.162 Digital exclusion in the area is above average, indicating that online only communication may not reach all residents. Multiple, accessible communication channels will be necessary to ensure timely updates and guidance during construction, particularly for older adults, those with disabilities, or socially isolated individuals.

21.163 Health service access and capacity considerations

21.164 Long GP travel times and a large population with long term conditions indicate potential pressure on local health services. Any project related impacts that increase demand, e.g. due to project related stress, or exacerbation of chronic conditions, could strain healthcare accessibility. Proactive engagement with health service providers and consideration of potential service impacts will be important to minimise risks to community health.

Pipeline C-W – LSOA data

21.165 The estimated population within the LSOA is 15,650 people.

21.166 The overall proportion of people aged 65+ in the LSOA is 31.08%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%).

21.167 There are 1,028 pensioners living alone in the area, 15.3% of the population aged 65+ here. This is higher than the proportion in England (12.81%) and similar to the proportion in Suffolk (14.81%). Additionally, 1,675 pensioners have bad or very bad health (35.18%). This proportion is lower than the proportion in England (42.08%) and Suffolk (38.82%).

21.168 The LSOA has an IoD housing in poor condition score of 0.52. This is higher than the score in England (0.16) and higher than the score in Suffolk (0.22).

21.169 The area has an average rank of 5,669 on the Living Environment domain. This means that PCW has higher levels of local environment deprivation relative to England (16,760) and Suffolk (18,515).

21.170 On average, 13.06% of households have access to green space. This is lower than the proportion of households with access to green space in England (18.26%) and Suffolk (16.24%).

21.171 7.71% of households have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and Suffolk (15.91%).

21.172 The average travel time to the nearest GP is 44 minutes. This is longer than the travel time in England (13 minutes) and longer than Suffolk (18 minutes).

21.173 The LSOA has an overall CNI rank of 9,512. This means that the area has higher levels of community need than England (17,040) and Suffolk (9,568).

21.174 In the LSOA, the Digital Exclusion Risk Index (DERI) score is 3.34. This means that the area has a higher level of digital exclusion risk than England (3.00) and Suffolk (3.13).

21.175 The proportion of households in fuel poverty has increased, from 11.64% in 2013 to 13.73% in 2023. This latest figure is higher than in England (11.4%) and higher than in Suffolk (11.14%).

21.176 In Jul-2025, 7.09% of those aged 16-64 in the LSOA were receiving PIP. This rate has increased since Apr-2022 (4.76%). The latest rate is lower than that in England (9.85%) and Suffolk (9.58%).

21.177 The proportion of people disabled under the Equality Act with their day-to-day activities limited a lot is 6.83%. This is similar to the proportion in England (7.33%) and Suffolk (7.24%).

21.178 10.65% of people are recorded as having depression. This is lower than the proportion in England (14.45%) and lower than the proportion in Suffolk (14.76%).

21.179 18.28% of people re recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and similar to the proportion in Suffolk (18.01%).

21.180 12.63% of people are recorded as obese. This is lower than the proportion in England (14.06%) and lower than the proportion in Suffolk (14.58%).

21.181 The LSOA has an IMD rank of 17,649. This means that the area has lower levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

21.182 Demographic profile and ageing population

21.183 The LSOA has a higher proportion of older residents compared with Suffolk and England, with 15.3% of pensioners living alone. Although rates of very poor health among older residents are lower than national and county averages, the combination of an ageing population and households with older adults living alone suggests potential sensitivity to disruption, changes in access, and temporary restrictions during construction activity and impacts relating to poor air quality.

21.184 Housing and local environment

21.185 The area has a higher than average housing in poor condition score and elevated Living Environment domain deprivation, indicating that some households may be more vulnerable to the effects of noise, vibration, dust, or other construction related disturbances. Poor quality housing and environmental deprivation may amplify perceived or actual impacts on wellbeing, particularly for older adults or residents with pre-existing health conditions.

21.186 Access to green space and recreational opportunities

21.187 Household access to green space is lower than both county and national averages, suggesting residents may rely on limited public or informal spaces for physical activity and mental restoration. Temporary loss or disruption of these

spaces could reduce opportunities for physical activity and social connection, particularly among older adults or those with limited mobility.

21.188 Transport reliance and access to services

21.189 Car ownership is relatively high, but a small proportion of households lack access to private transport. Average travel time to the nearest GP is 44 minutes, well above county and national averages, indicating a significant barrier to primary healthcare access. Temporary transport disruption or diversions could exacerbate access difficulties for vulnerable populations, including older adults, those with chronic health conditions, or individuals reliant on public transport.

21.190 Health status, long term conditions, and vulnerability

21.191 Rates of high blood pressure are elevated compared to England, whilst obesity and depression are lower than local and national averages. Disability rates and PIP receipt are below or similar to county and national benchmarks, suggesting a mixed profile of health needs. Despite relatively lower rates of some conditions, the ageing population and prevalence of long-term conditions still indicate that construction related stressors could disproportionately affect certain groups.

21.192 Socio-economic vulnerability and inequalities

21.193 Fuel poverty has increased and is higher than Suffolk and England averages, and the area has a relatively high Community Needs Index rank. This indicates potential socio economic vulnerability, meaning that some residents may be more sensitive to disruptions affecting transport, services, or access to essential resources. Digital exclusion is above average, suggesting that multiple communication channels may be needed to reach all residents effectively.

21.194 Health service access and capacity considerations

21.195 Given the long average travel time to primary care and the presence of older adults and residents with long term conditions, any project related disruption, such as temporary road closures, traffic increases, or reduced access to services, could exacerbate barriers to healthcare. Coordination with local health services and consideration of capacity constraints will be important to minimise potential impacts on service delivery and community health.

Pipeline C-S – LSOA data

21.196 The estimated population within the LSOA is 7,966 people.

21.197 The overall proportion of people aged 65+ in PCS is 28.31%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%).

21.198 There are 547 pensioners living alone in the area, 15.54% of the population aged 65+ here. This is higher than the proportion in England (12.81%) and similar to the proportion in Suffolk (14.81%). Additionally, 794 pensioners in the

LSOA have bad or very bad health (35.61%). This proportion is lower than the proportion in England (42.08%) and Suffolk (38.82%).

21.199 The LSOA has an IoD housing in poor condition score of 0.45. This is higher than the score in England (0.16) and higher than the score in Suffolk (0.22).

21.200 The area has an average rank of 12,371 on the Living Environment domain. This means that the LSOA has higher levels of local environment deprivation relative to England (16,760) and Suffolk (18,515).

21.201 On average, 12.14% of households in the area have access to green space. This is lower than the proportion of households with access to green space in England (18.26%) and Suffolk (16.24%).

21.202 10.03% of households have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and Suffolk (15.91%).

21.203 The average travel time to the nearest GP is 45 minutes. This is longer than the travel time in England (13 minutes) and longer than Suffolk (18 minutes).

21.204 The LSOA has an overall CNI rank of 5,119. This means that the area has higher levels of community need than England (17,040) and Suffolk (9,568).

21.205 The area has a Priority Places for Food Index rank of 9,132. This means that the LSOA has higher levels of food insecurity than Suffolk (18,392) and England (16,898).

21.206 The Digital Exclusion Risk Index (DERI) score is 3.38. This means that the LSOA has a higher level of digital exclusion risk than England (3.00) and has a higher level than Suffolk (3.13).

21.207 11.41% of the working age population in the area are receiving PIP. This is higher than the proportion in England (9.85%) and higher than the proportion in Suffolk (9.58%).

21.208 The proportion of people disabled under the Equality Act with their day-to-day activities limited a lot is 7.58%. This is similar to the proportion in England (7.33%) and Suffolk (7.24%).

21.209 13.25% of people in the LSOA are recorded as having depression. This is lower than the proportion in England (14.45%) and lower than the proportion in Suffolk (14.76%).

21.210 20.21% of people in the area are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and higher than the proportion in Suffolk (18.01%).

21.211 14.59% of people are recorded as obese in the LSOA. This is similar to the proportion in England (14.06%) and similar to the proportion in Suffolk (14.58%).

21.212 The LSOA has an IMD rank of 12,535. This means that the area has higher levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

21.213 Demographic profile and ageing population

21.214 The LSOA has a significantly older population than both Suffolk and England. Over 15% of older residents live alone, which increases vulnerability to social isolation, reduced resilience during disruption, and challenges in accessing services. Although rates of very poor health among pensioners are lower than county and national averages, the combination of advanced age, lone households, and long travel times to services suggests heightened sensitivity to construction impacts and impacts relating to poor air quality

21.215 Housing quality and local environment

21.216 The area has a notably high score for housing in poor condition and elevated local environmental deprivation. These factors can increase susceptibility to physical and mental health effects associated with noise, dust, vibration, and general disturbance. Residents in poorer quality housing may experience proportionately greater discomfort or exposure during construction phases.

21.217 Access to green space and recreational opportunities

21.218 Access to green space is substantially lower than local and national averages. This suggests that the community may rely heavily on a limited number of outdoor spaces and rights of way for physical activity and social wellbeing. Any temporary loss of access or disruption to these spaces could disproportionately affect opportunities for exercise, nature contact, and alleviation of stress particularly for older adults, those without private transport, or individuals with health conditions.

21.219 Transport reliance and access to health services

21.220 Travel time to the nearest GP is on average 45 minutes, well above Suffolk and national averages. Although car ownership levels are relatively good, around one in ten households still lack access to a private vehicle. Construction related disruption or changes to travel routes could materially affect residents' ability to access healthcare, particularly older people or those receiving PIP, who may depend on stability in transport and service access.

21.221 Health status, long term conditions and functional limitations

21.222 The area exhibits a mixed health profile. Rates of depression are lower than average, while obesity levels are similar to wider benchmarks. However, prevalence of high blood pressure is higher than in Suffolk and England, and a relatively high proportion of working age people receive PIP. This suggests a notable level of long term illness or disability, which may heighten vulnerability

to disruptions, noise, stress, or decreased accessibility during construction periods.

21.223 Socio economic vulnerability and inequalities

21.224 Socio economic vulnerability is a key consideration in the area. The LSOA has high community need, high levels of food insecurity, and a higher than average risk of digital exclusion. These factors may limit the community's resilience to disruption and reduce the effectiveness of digital only information or engagement approaches. Residents experiencing financial insecurity or fuel poverty may be particularly sensitive to additional stressors that affect daily living, mobility, or access to affordable services.

21.225 Health service access and capacity considerations

21.226 Given the long GP travel times and the relatively high proportion of residents with long term conditions or disabilities, local healthcare access is already constrained. Any project related impacts that increase travel time, disrupt transport routes, or increase demand (e.g. through heightened stress or exacerbation of chronic conditions) could add to existing pressures. Coordinated engagement with local health providers and clear communication routes will be important to mitigate these impacts.

Pipeline S-S – LSOA data

21.227 The estimated population within the LSOA is 14,904 people.

21.228 The overall proportion of people aged 65+ in the LSOA is 30.04%. This is higher than the proportion of people aged 65+ in England (18.61%) and Suffolk (23.9%).

21.229 There are 1,297 pensioners living alone in the area, 18.9% of the population aged 65+ here. This is higher than the proportion in England (12.81%) and Suffolk (14.81%).

21.230 The LSOA has an IoD housing in poor condition score of 0.20. This is higher than the score in England (0.16) and lower than the score in Suffolk (0.22).

21.231 The area has an average rank of 21,594 on the Living Environment domain. This means that the LSOA has lower levels of local environment deprivation relative to England (16,760) and lower levels of deprivation relative to Suffolk (18,515).

21.232 On average, 22.79% of households in the LSOA have access to green space. This is higher than the proportion of households with access to green space in England (18.26%) and higher than the proportion in Suffolk (16.24%).

21.233 15.56% of households have no access to a car or van. This is less than the proportion without access to a car or van in England (23.54%) and Suffolk (15.91%).

21.234 The average travel time to the nearest GP is 12 minutes. This is similar to the travel time in England (13 minutes) and shorter than Suffolk (18 minutes).

21.235 The LSOA has a Priority Places for Food Index rank of 10,329. This means that the area has higher levels of food insecurity than England (16,898) and Suffolk (18,392).

21.236 The area has an overall CNI rank of 4,400. This means that the LOAS has higher levels of community need than England (17,040) and Suffolk (9,568).

21.237 In the LSOA, the Digital Exclusion Risk Index (DERI) score is 3.34. This means that the area has a higher level of digital exclusion risk than England (3.00) and Suffolk (3.13).

21.238 16.94% of the working age population were claiming out of work benefits in February 2025. This is higher than the proportion in England (15.38%) and Suffolk (12.96%).

21.239 The proportion of households in fuel poverty has increased, from 10.82% in 2013 to 14.28% in 2023. This latest figure for the area is higher than in England (11.4%) and Suffolk (11.14%).

21.240 11.92% of the working age population are receiving PIP. This is higher than the proportion in England (9.85%) and Suffolk (9.58%). In July 2025, 11.92% of those aged 16-64 in the LSOA were receiving PIP. This rate has increased since April 2022 (8.41%). The latest rate is higher than that in England (9.85%) and Suffolk (9.58%).

21.241 13.93% of people in the LSOA are recorded as having depression. This is similar to the proportion in England (14.45%) and similar to the proportion in Suffolk (14.76%).

21.242 21.61% of people are recorded as having high blood pressure. This is higher than the proportion in England (15.5%) and higher than the proportion in Suffolk (18.01%).

21.243 15.61% of people are recorded as obese. This is higher than the proportion in England (14.06%) and higher than the proportion in Suffolk (14.58%).

21.244 The LSOA has an IMD rank of 13,948. This means that the area has higher levels of deprivation compared to England (16,746) and higher levels of deprivation compared to Suffolk (17,877).

Public Health considerations based on the data:

21.245 Demographic profile and ageing population

21.246 The LSOA has a substantially older population than both Suffolk and England, with almost one in five older residents living alone. This high prevalence of lone pensioner households suggests increased vulnerability to social isolation, difficulties accessing services during periods of disruption, heightened sensitivity to construction related stressors and impacts relating to poor air quality. Although rates of very poor health among pensioners are broadly in line

with Suffolk and slightly better than England, the combination of advanced age, lone households, and existing ill health remains a key vulnerability factor.

21.247 Housing quality and local environment

21.248 Housing quality in the area is mixed. While the proportion of homes in poor condition is slightly above the national average, local environmental deprivation is relatively low. This suggests that whilst the wider area benefits from better environmental conditions, individual households, particularly older or lower income residents, may still experience disproportionate impacts including from noise, air pollution, vibration and or reduced outdoor amenity.

21.249 Access to green space and recreational opportunities

21.250 Unlike other LSOAs along the route, this LSOA has stronger access to green space, with opportunities for recreation and outdoor activity above both Suffolk and national averages. These spaces play a key role in supporting physical and mental wellbeing, especially for older adults and those on low incomes. Temporary loss of access or increased disturbance could therefore have a noticeable negative effect, even in an area where access is comparatively good.

21.251 Transport reliance and access to health services

21.252 Car ownership levels are moderate in this area, with around 15% of households lacking a vehicle. The travel time to the nearest GP is favourable, shorter than the Suffolk average and similar to England, suggesting relatively good baseline healthcare accessibility. Nevertheless, construction related disruption could still affect access for older adults, residents receiving PIP, and those already facing mobility or financial barriers.

21.253 Health status, long-term conditions and functional limitations

21.254 The area has high levels of long term conditions, including significantly elevated rates of high blood pressure and obesity. The proportion of working age residents receiving PIP is notably high, indicating substantial health related functional limitations. Very poor self reported health is also marginally above average. These factors increase the likelihood that disruption, stress, or reduced access to services may have amplified impacts on the wellbeing of affected residents.

21.255 Socio-economic vulnerability and inequalities

21.256 The LSOA exhibits considerable socio economic vulnerability, with high levels of community need, elevated food insecurity, rising fuel poverty, and above average reliance on out of work benefits. Digital exclusion risk is also pronounced. These intersecting vulnerabilities may limit residents' resilience during construction, reduce their ability to engage with digital communication channels, and heighten sensitivity to temporary changes in access, mobility, and affordability.

21.257 Health service access and capacity considerations

21.258 Although GP access times are favourable, the high prevalence of long term health conditions, high PIP receipt, and pockets of deprivation suggest local health services support a population with comparatively complex needs. Any construction related increases in travel time, stress, or disruption to transport routes could place additional strain on system capacity or impact residents' ability to attend appointments. Coordinated planning with local primary care services and non-digital channels for communication will therefore be important.

22 Public Rights of Way (PRoW)

22.1 The applicant should be aware of SCC Energy and Climate Adaptive Infrastructure Policy Public Rights of Way and Green Access https://www.suffolk.gov.uk/asset-library/prow-greenaccess.v4.pdf

Adaptive Infrastructure Policy Public Rights of Way and Green Access

22.2 When dealing with Rights of Way issues the County Council expects promoters of infrastructure projects to consider the importance of, and impacts upon, Public Rights of Way or Green Access when developing their projects.

22.3 Considers that Public Rights of Way and Green Access need to be treated by applicants in a different way to other types of highways, because of their unique characteristics and status, specifically in terms of their relationship to place, public amenity, historic and landscape character, well-being, and access to nature. Therefore, for example, it is wholly inappropriate to equate a car journey with a countryside walk, when assigning value to usage of rights of way and public open space.

22.4 Expects that infrastructure scheme promoters will mitigate and compensate for the adverse impact of construction and operation of their schemes, in accordance with the mitigation hierarchy, as set out in National Policy Statement NPS EN -1 (November 2023).

22.5 The applicant should minimise the adverse impacts during both construction and operation of the project on the Rights of Way Network considering the following factors:

- **Physical changes to resources** (i.e. changes to PRoW through diversions or temporary and permanent closures, severance, loss of connectivity, changes to journey length).
- **Changes to the quality of the experience** people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, light pollution, and traffic.

- **User stress,** that is effects experienced by receptors due to route uncertainty and safety fears.
- **Changes to the experience** of people using recreational resources, due to increases in numbers of people using them i.e. displacement of people from one area to another.
- **Tranquillity and ambience experienced** by recreational receptors.

22.6 Full details of SCC guidance on this matter can be found at PRoW_GreenAccess.v4.

22.7 SCC PRoW respectfully asks for All PRoW, to be considered in their own subject heading, due to their unique characteristics and status.

Scheme Delivery Summary Document

22.8 A desktop study of PRoWs is referred to. We would request the applicant obtains the most up to date and correct data from the PRoW & Access Team at Suffolk County Council, and for the applicant to visit the sites where the PRoW is affected. This should provide accurate definite alignments and statements.

22.9 SCC Mitigation table 4.3 does not cover specific mitigation for PRoWs, promoted routes/trails, open access or other green access infrastructure. We require more information on:

22.10 Temporary diversions/ closures, with regards to closure/diversions times, durations, proposed diversion routes and assessments of diversion routes. Diversion routes should be at least commensurate in condition, width and status of the existing route.

22.11 What is the mitigation for routes with no alternative routes/diversions?

22.12 SSC PRoW and Green Access's first option for works on a PRoW is to keep it open with traffic management that gives priority to the PRoW user.

22.13 Several works state that some PRoWs will need to be rerouted onto carriageway. Before this is agreed, SCC PRoW would require a road safety audit, to assess if the proposed diversion routes onto carriageways is safe for all PRoW users.

22.14 What are the cumulative impacts on other consents to avoid severance or sterilisation of an area through closures.

22.15 Routes should remain open as far as is practicably possible.

22.16 How long are the PRoWs to be temporarily closed and diverted?

22.17 PRoWs have not been individually named yet, and all promoted routes and national trails should also be included.

22.18 PRoWs appear to have not been assessed on their user types, for example bridleways for cyclists and horse riders. The British Horse Society has published guidance on working near to Bridleways.

22.19 Surveys should be undertaken on the PRoWs affected, to ascertain user types. The survey parameters should be prior agreed with SCC PRoW as to type of survey, location and timings.

22.20 Section 2.1.5 mentions construction compounds, these should be sited a clear distance from the PRoW to avoid tunnel effects on the routes, which may discourage use, and good clearance for user groups and we recommend at least 2m clearance for temporary fencing. Any stockpiling should not obstruct the PRoW.

22.21 PRoWs should be shown on plans as their correct status for example FP, BR, RB and BOAT.

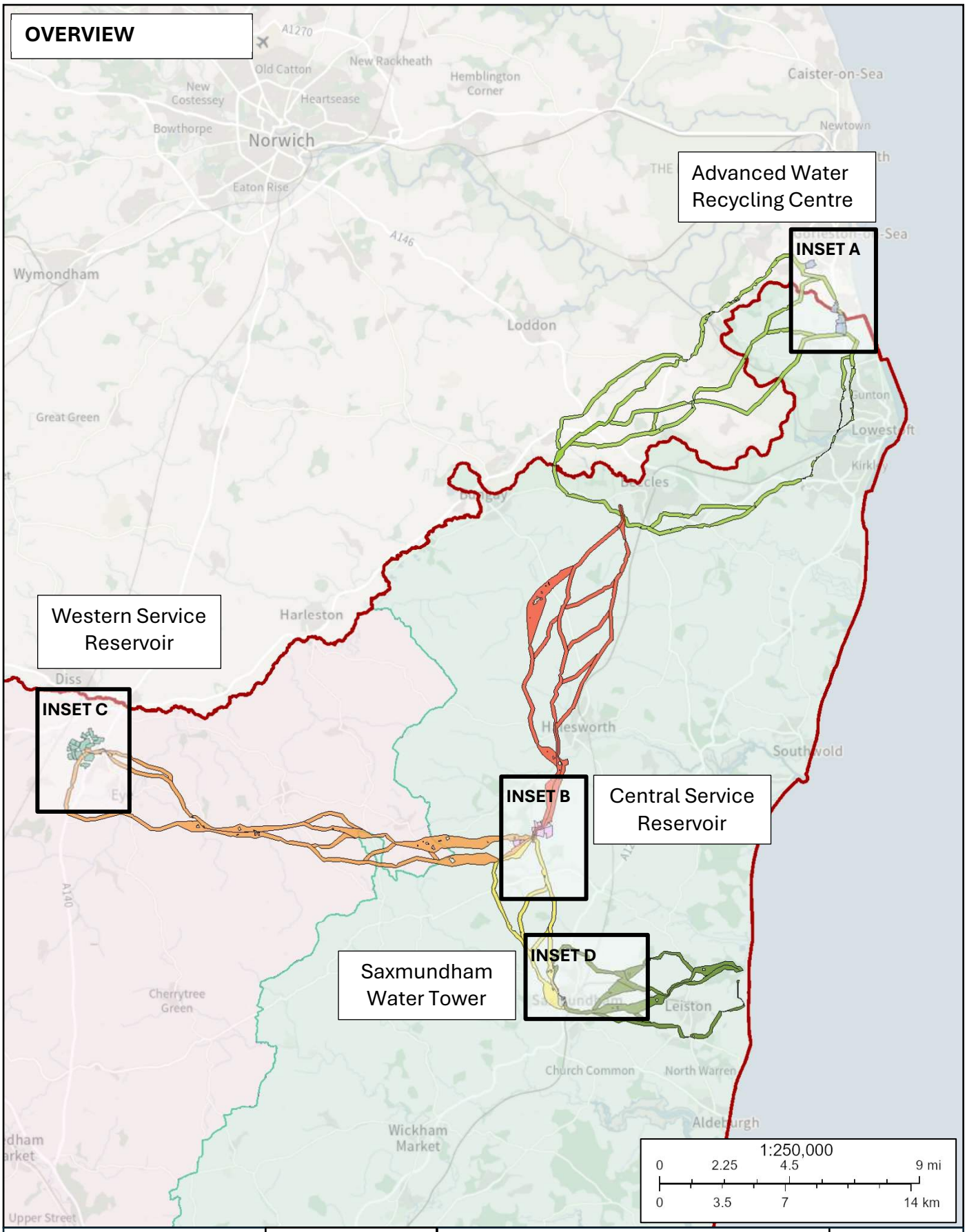
22.22 SCC PRoW will also expect a Public Rights of Way (PRoW) Management Plan and encourages early engagement.

Suffolk County Council

SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE

Appendix B (SCC Pipelines and Land Parcels Mapping)

Suffolk County Council



Suffolk County Council

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Suffolk
IP1 2BX

SUFFOLK WATER RECYCLING, TRANSFER AND STORAGE

Nationally Significant Infrastructure Project (NSIP)

Advanced Water Recycling Centre, and associated development

N
W E
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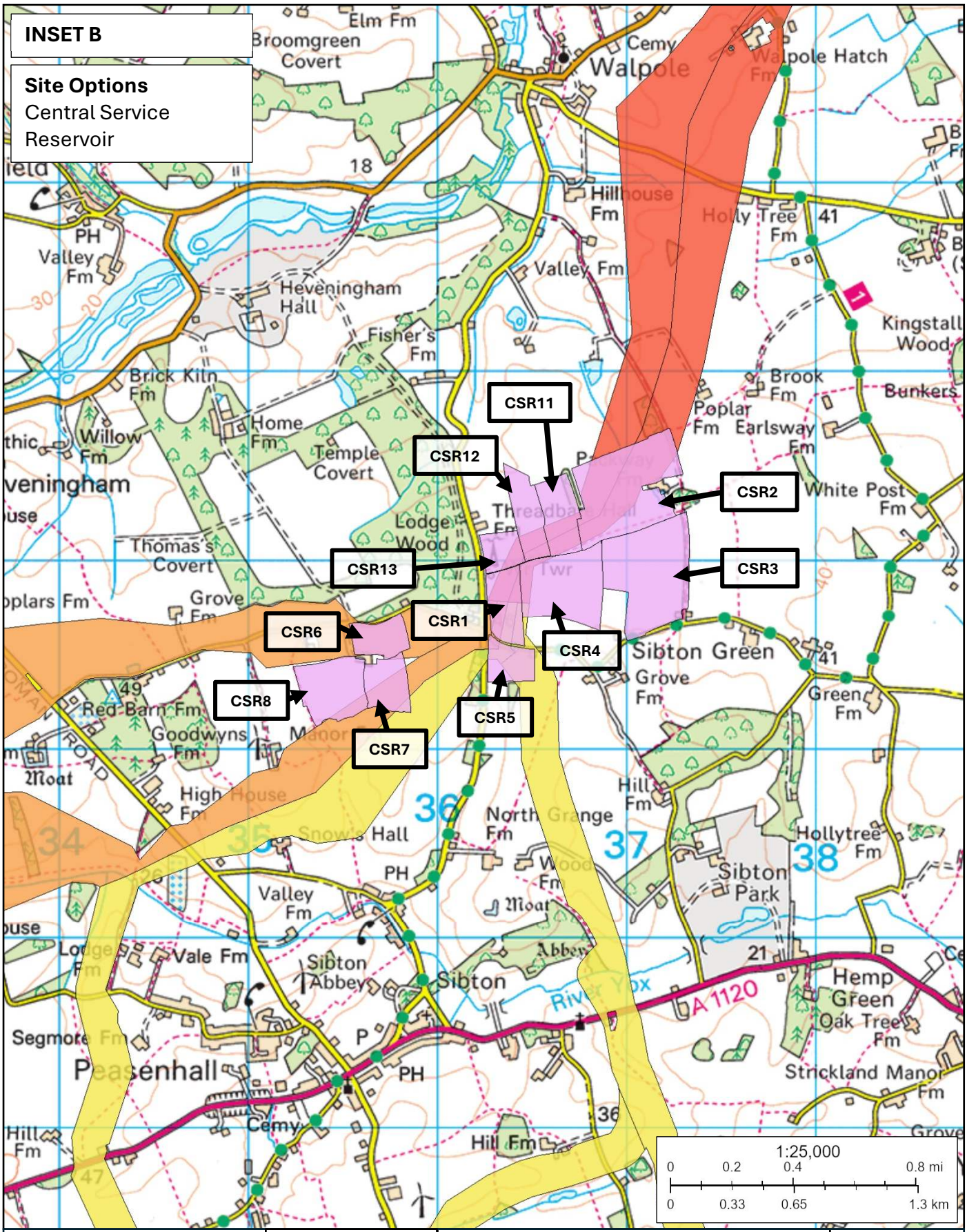

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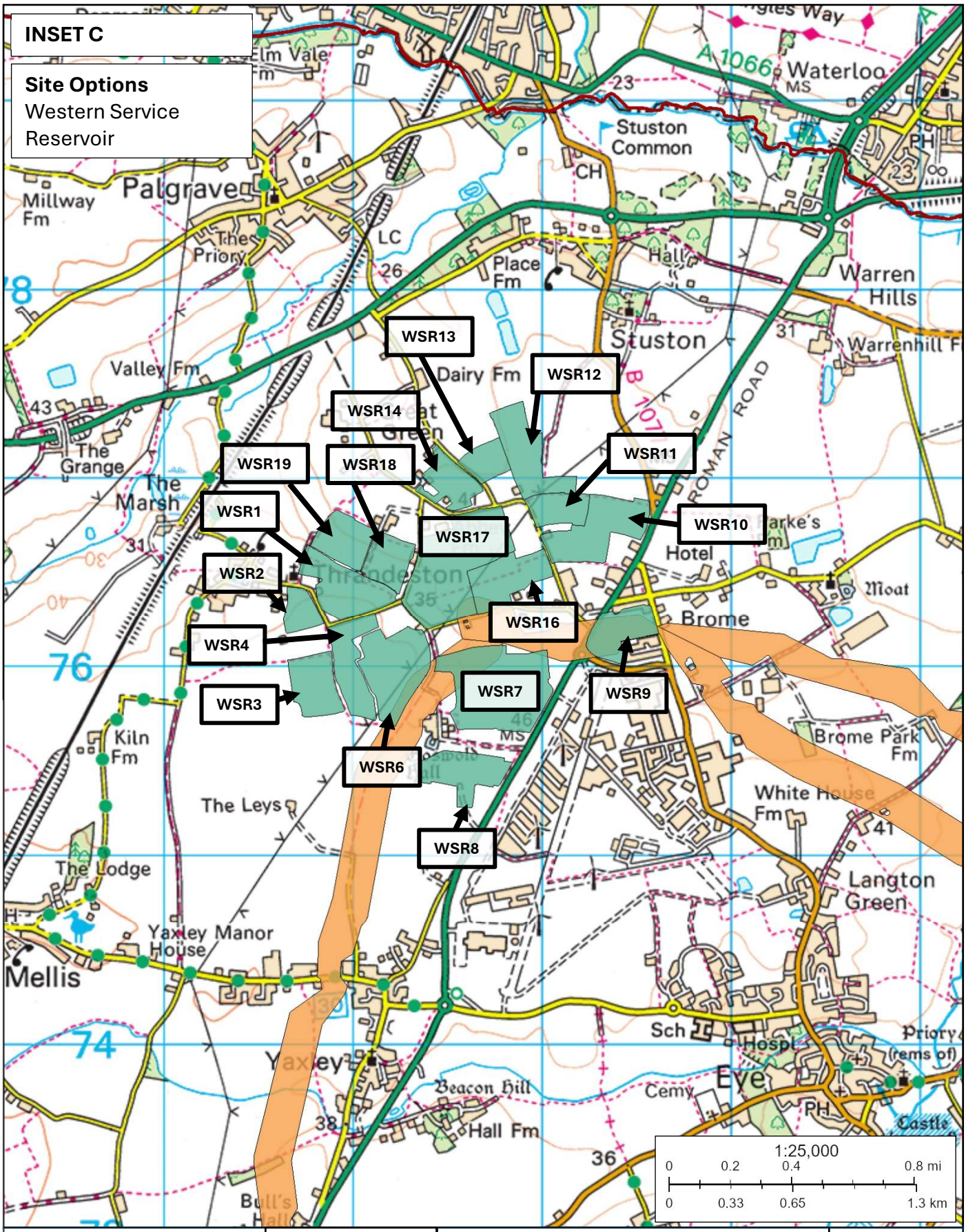

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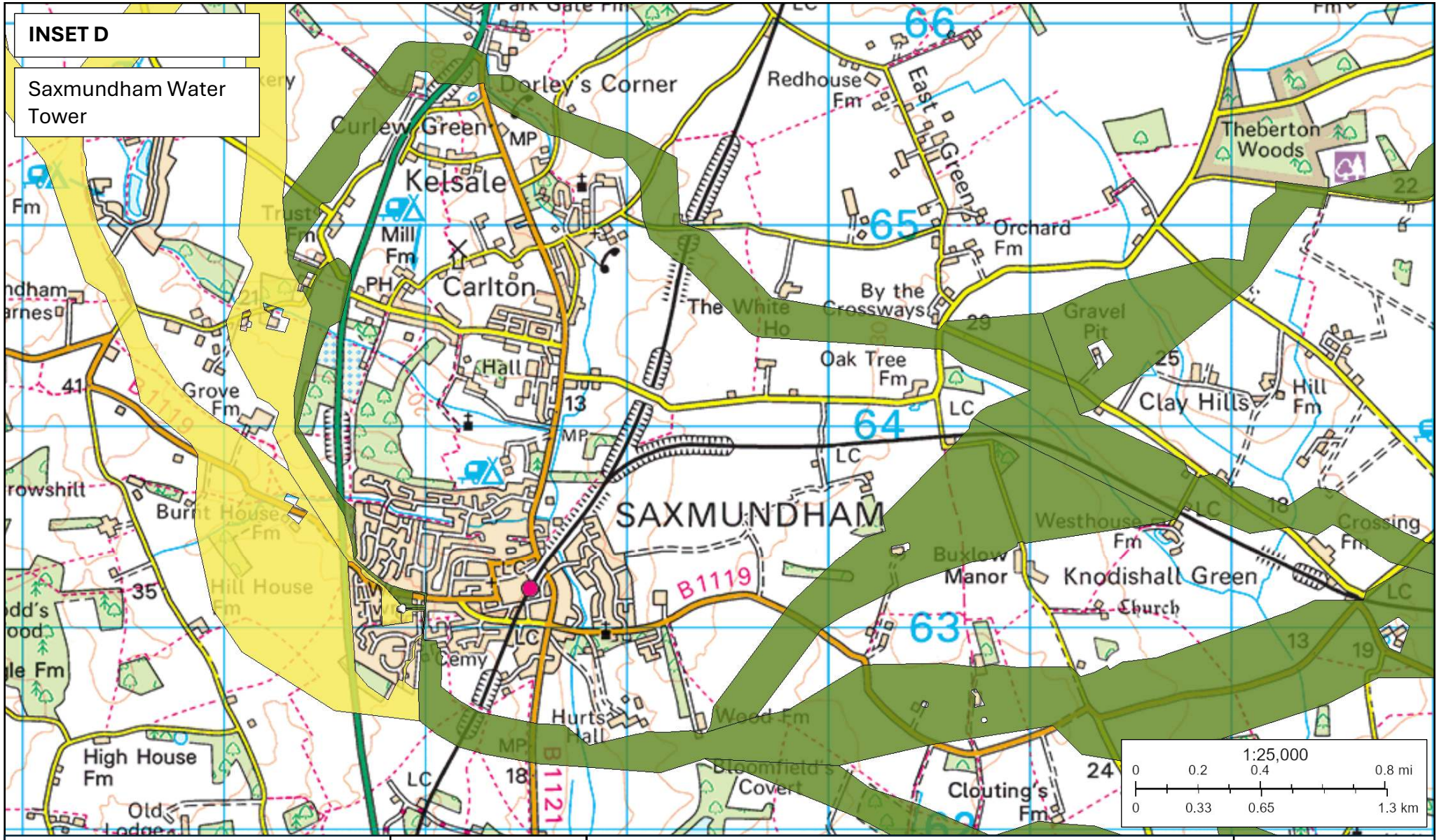

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