



Sea Link Grid Reinforcement

Targeted Consultation on Changes to Sea Link Proposals

Suffolk County Council Response

August 2024

Contents

1	Introduction.....	3
2	Changes to the Sea Link Proposals Since Statutory Consultation.....	3
3	Key Issues Identified from the Targeted Consultation	4
	Reduction of Order Limits.....	4
	Impacts of DC Cable Corridor Between Aldeburgh and Saxmundham	4
	Impacts of AC Cable Corridor Between Saxmundham and Friston.....	4
	Proposed Converter Station Site	5
	Proposed River Fromus Crossing	5
	Access to Saxmundham from Sternfield and Benhall	6
	Working Hours	6
4	General Comments.....	6
	National Policy	6
	Suffolk County Council Energy and Climate Adaptive Infrastructure Policy	7
	Sea Link Proposals - Coordination with Other Projects.....	8
	National Grid Ventures (NGV) Emerging Proposals and their Coordination with Sea Link.....	8
	Project Engagement.....	9
	Coordinated Consenting Approach	9
	Cumulative Impacts.....	10
5	Overview of the County Council’s Position on the specific proposals	11
6	Site specific key Issues raised by the technical comments.....	12
7	Appendix A – Detailed Technical Comments.....	16
8	Archaeology.....	16
9	Ecology.....	17
10	Highways.....	18
11	Joint Emergency Planning Unit	21
12	Landscape.....	22
13	Lead Local Flood Authority (LLFA).....	24
14	Public Rights of Way (PRoW).....	25
15	Suffolk Fire and Rescue (SFRS)	27
	Appendix C – Maps.....	28

1 Introduction

- 1.1 The following comments by Suffolk County Council (the County Council) are in response to the targeted consultation held between 8 July and 11 August 2024 by National Grid Electricity Transmission (NGET) regarding changes to the Sea Link proposals since the Statutory Consultation closed in December 2023.
- 1.2 The Sea Link proposals consist of the construction of 2GW High Voltage Direct Current (HVDC) undersea electricity link between Suffolk and Kent which will connect to a substation at Friston in East Suffolk, which has consent via a third party (Scottish Power Renewables) but as yet is unbuilt.
- 1.3 The offshore scheme consists of a 122 kilometres (km) subsea cable which will run between the proposed Suffolk landfall location, between Aldeburgh and Thorpeness, and the Kent landfall location at Pegwell Bay.
- 1.4 The onshore scheme proposes the installation of a High Voltage Alternating Current (HVAC) 1.9km underground cable between the proposed Friston substation and the proposed converter station near the town of Saxmundham, the 2GW HVDC converter station itself, of up to 26 metres (m) in height including ancillary works and a HVDC underground cable connection of 10km between the converter station and a transition joint bay approximately 900m from shore to enable the transition from offshore to onshore technology.
- 1.5 The proposals also include the construction of a substation in Friston if it is not built under its existing consent by Scottish Power Renewables.
- 1.6 The comments in this response should be considered in association with those made by the County Council at Statutory Consultation.

2 Changes to the Sea Link Proposals Since Statutory Consultation

- 2.1 The changes to the Sea Link proposals have been cited by the developer as including: -
 - Reduction of the area included within the proposed Order Limits to reflect the land required for this project only, so no longer allowing for effective coordination with two other projects, Nautilus and LionLink.
 - Confirmation of the preferred western access route to the converter station site, for construction and maintenance, with some modifications after discussions with stakeholders, including moving the River Fromus crossing point north to avoid flood zones and the acknowledgement that a bridge up to a height of 6 metres with associated longer approach ramps may be required to lessen ecological impacts
 - Various amendments have also been made to construction and maintenance related activities including access routes, compounds, temporary overhead line diversions including the addition to the core working hours to include 7am – 5pm on Sundays and Bank Holidays.
 - Alteration of the cable route north of Aldeburgh.

- Additional land has also been identified for environmental mitigation and enhancement.
- Strategy for coordination with other projects has also evolved.
- Offshore amendments to the cable route, additional marine areas for construction vessel manoeuvring and changes to backing marine trenches.

2.2 The County Council electoral divisions which will be directly affected by the scheme include the following: -

- Aldeburgh and Leiston
- Blything
- Kessingland and Southwold
- Wilford

2.3 The first section of this representation outlines the key issues which the County Council has identified, which has been informed by our technical specialists, whose comments are provided in Appendix A.

3 Key Issues Identified from the Targeted Consultation

Reduction of Order Limits

3.1 Whilst the reduction in the general area covered by the proposed Order Limits is supported, this raises other concerns including:

- The reduction in the area of land available for landscaping and bio-diversity net gain.
- Inadequate land available for the establishment of compensatory public rights of way.
- Inadequate land to enable the proper coordination between Sealink, Nautilus and Lionlink.

Impacts of DC Cable Corridor Between Aldeburgh and Saxmundham

3.2 The County Council considers it essential that Sea Link works closely with the emerging Nautilus proposals to manage the impacts of the cable corridor and especially to avoid repeated excavations whilst cable ducts for the second project are laid.

Impacts of AC Cable Corridor Between Saxmundham and Friston

3.3 The County Council considers it essential that Sea Link works closely with LionLink and the emerging Nautilus proposals to manage the impacts of the cable corridor to ensure the absolute minimum of vegetation loss from construction operations.

3.4 The County Council is concerned that failure to develop a fully coordinated approach for this part of the scheme will lead to additional harm which could otherwise be avoided.

- 3.5 It is also important to recognise that the AC cable corridor in its current routing is likely to undermine the effectiveness of the landscape mitigation which has been set out for the consented DCOs for EA1N & 2.

Proposed Converter Station Site

- 3.6 The County Council has concerns regarding the red line around the converter station site in Saxmundham, which the County Council regards as being insufficient to effectively provide mitigation or appropriate scope to manage 'cut and fill' construction activities and surface water drainage requirements for the proposed and subsequent proposed schemes.
- 3.7 The lack of a comprehensive and finalised version of the vision for the converter station site is cause of significant concern for the County Council, as the master planning of the site is essential to manage the cumulative impacts of potentially three converter stations of up to 26m in height in a predominantly rural area which has not previously seen development of this scale.

Proposed River Fromus Crossing

- 3.8 The County Council has significant concerns regarding the proposed bridge over the River Fromus for permanent access to the converter station site.
- 3.9 Regarding the proposed scale of the bridge potentially being up to six metres in height with a span of over 150 metres, including embankment, the County Council considers the crossing to be a disproportionate solution to the requirement of permanent access to the converter station site which would have significant impacts on the landscape, adjacent heritage assets and the water environment.
- 3.10 The setting of the crossing, within land to the south of Saxmundham and east of B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018) due to the views of Hurts Hall, St John the Baptist Church, and the town beyond.
- 3.11 The County Council notes that the rail bridge between the proposed access and the A12 currently has restrictions for Abnormal Indivisible Load (AIL) movements due to concerns over its structural condition. Access for large or heavy vehicles through Saxmundham would not be regarded as a viable option.
- 3.12 The County Council expects the promoter to undertake a comprehensive and transparent review of the alternative access options, prior to submission, to demonstrate that no alternative less harmful route exists, and publish their findings.
- 3.13 In the event of a less damaging access option being identified, the County Council considers it appropriate for the promoter to amend the Draft Order Limits, red line, to accommodate this alternative option.

Access to Saxmundham from Sternfield and Benhall

3.14 The County Council is concerned regarding the likely impacts of increased traffic and disruption caused by the preferred access route to the converter station site via the B1121 on communities to the south of Saxmundham, which rely on the town for shops and services, including the villages of Benhall and Sternfield.

Working Hours

3.15 The County Council has significant concerns at the proposed core working hours being amended to include 7am to 5pm on Sunday and Bank Holidays.

3.16 The potential for construction activities taking place within the additional core working hours stated could result in communities in the locality having no respite from construction traffic and contribute to substantial impacts on the mental health and wellbeing of those communities. The promoter must consider the community wellbeing impacts of the proposed working hours.

3.17 The possibility of construction activities and associated traffic on Sundays and Bank Holiday in an area which is partly within the Suffolk Coasts and Heaths National Landscape is likely to have substantial impacts on Public Rights of Way (PRoW) and roads used for recreational purposes at times when they are most frequently used. This in turn is likely to affect local tourism due to the potential in a reduction of visitor numbers caused by the disruption.

3.18 The County Council notes that the potential impacts have been recognised by the applicant in 1.3.18 of the Executive Summary, however, impacts of the Sea Link construction must also be considered cumulatively with other NSIPs both in terms of geographical proximity and or overlap of construction timelines.

3.19 The County Council insists that the applicant must consider the repeated impacts on communities if the projects (Sea Link, LionLink and Nautilus) are delivered sequentially, for example the loss of amenity and health benefits when PRoW are repeatedly closed and reopened which will discourage use.

4 General Comments

National Policy

4.1 The County Council acknowledges the need to increase renewable energy generation, the increasing demand for new additional generation and the UK Government's legal obligation to achieve Net Zero emissions by 2050, as supported by research and publications by the Committee for Climate Change.

4.2 The Government issued the revised version of the National Policy Statements on 22 November 2023, with the amendments having full effect in relation to 'those applications for development consent accepted for examination, after the designation of those amendments', which will include the Sea Link proposals.

4.3 The National Policy Statement, EN-1, is the UK Government's overarching strategy for energy. The County Council would like to draw the applicant's attention to the following assessment requirements: -

- *‘Applicants for Critical National Priority (CNP) infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.’*
- *‘Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced, or mitigated.’*
- *‘Applicants should set out how residential impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored, and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.’*

4.4 The National Policy Statement (EN-5) is the UK Government’s strategy for electricity network infrastructure. This policy statement applies to transmission systems and associated infrastructure (e.g. substations) and sets out the general principles that should be applied in the assessment of the application for development consent.

Suffolk County Council Energy and Climate Adaptive Infrastructure Policy

4.5 The County Council has declared a climate emergency and is therefore predisposed to support projects which are necessary to deliver Net Zero Carbon for the United Kingdom (UK).

4.6 The County Council updated its energy infrastructure policy in May 2023¹, setting out its overall stance on projects required to deliver Net-Zero Carbon for the UK. However, proposals will not be supported unless the harms of the projects alone, as well as cumulatively and in combination of other projects, are adequately recognised, assessed, appropriately mitigated, and if necessary, compensated.

¹ Suffolk County Council’s Energy and Climate Adaptive Infrastructure Policy
<https://www.suffolk.gov.uk/asset-library/energy-and-climate-adaptive-infrastructure-policy.pdf>

Sea Link Proposals - Coordination with Other Projects

- 4.7 The County Council maintains its stance that coordination between projects, including the utilisation of closely parallel onshore cable routing, should be a top priority in order to minimise the impacts upon the Suffolk coastline. In respect of this stance, the County Council notes that the Sea Link proposals have been designed to coordinate with two further projects with regards to providing space at landfall at Aldeburgh, the converter station site east of Saxmundham, and the cable corridor from landfall to the converter station, via the consented but as yet unbuilt substation at Friston. This would be in accordance with **National Policy Statement EN-5 2.15.1** which states that coordinated approaches to delivering offshore and onshore transmission, to minimise overall environmental, community and other impacts, as set out in detail in EN-5, must be considered.
- 4.8 However, it is noted that the Draft Order Limits for the Sea Link proposals have been reduced to reflect land required for this project only, whilst still stating that the project can still coordinate with other projects at landfall and the converter station site.

National Grid Ventures (NGV) Emerging Proposals and their Coordination with Sea Link

LionLink

- 4.9 In March 2024, NGV announced that LionLink will be removing the Aldeburgh landfall option from its proposals, stating a preference for a landfall further north at Southwold or Walberswick. The LionLink proposals still include co-locating the converter station alongside Sea Link at the site near Saxmundham.
- 4.10 In response, the latest Sea Link proposals have removed LionLink cables and refined the Draft Order Limits to take out areas NGV may require for their future projects' converter stations.
- 4.11 As stated in its response to the Statutory Consultation, the County Council reiterates that the failure to coordinate with LionLink could lead to the County Council objecting to the LionLink proposals at the next stage of consultation due to the lack of coordination with Sea Link. The County Council notes that the Sea Link proposals still retain space to coordinate with future projects.

Nautilus

- 4.12 Nautilus is a proposed scheme to construct a subsea multi-purpose interconnector (MPI) between the United Kingdom and Belgium.
- 4.13 Although connection for Nautilus was initially proposed for the Suffolk Coast, the project promoter, NGV, in response to the community concerns regarding the number of energy projects proposed for East Suffolk, has been considering an alternative option to connect on the Isle of Grain in Kent.
- 4.14 In March 2024, the energy regulator, Ofgem announced that it did not approve the Isle of Grain proposals due to the cost of upgrading the network around Grain to transmit power between Nautilus and the electricity system being too high.

- 4.15 Therefore, on 15 July 2024, Ofgem stated that it is consulting on the possibility of Nautilus connecting at Friston, due to the cost being lower, as fewer reinforcements and upgrades are required to transmit energy from Nautilus to the wider electricity network. This consultation closes on 15 August 2024.
- 4.16 It is important that the applicant for Sea Link considers the scenario of Nautilus connecting to the proposed Friston substation and the implications and impacts of a third project being planned in the locality of the Sea Link and LionLink, considering what potential coordination opportunities may exist to minimise impacts to the host communities, highways network and natural environment should all projects receive development consent.

Project Engagement

- 4.17 The timing of the targeted consultation, overlapping the start of the school summer holiday and the Ofgem consultation for Nautilus and the length of the consultation period of five weeks has made full engagement by relevant internal stakeholders and host communities challenging.
- 4.18 The County Council notes that the timing of this consultation was affected by the announcement of the General Election, which subsequently took place on 4 July 2024, however, engaging effectively with communities already extremely concerned with the potential cumulative impacts of several NSIP proposals in their area is essential in building trust and allowing both sides to understand the potential impacts and potential opportunities for mitigation through community benefits.
- 4.19 The County Council is likely to raise the shortcomings of the Sea Link engagement in its Adequacy of Consultation response at the time of submission.

Coordinated Consenting Approach

- 4.20 In the County Council's response to Sea Link's Statutory Consultation it was noted that the OCSS funding announcement by Government on 5 December 2023 stated that a consortium of Sea Link and the offshore windfarm proposals of North Falls and Five Estuaries will receive funding to explore coordination between the projects. This feasibility assessment for coordination is still ongoing as of July 2024.
- 4.21 Given the spatial interdependencies of Sea Link, LionLink and the emerging proposals of Nautilus and the expectation of the amended National Policy Statements (NPS) for coordinated approaches, the County Council consider it essential for the National Grid Group to fully align the projects both spatially and with their timing and development of their consenting in order to minimise the impacts of their projects on the communities and environment of the area. Such an approach would also be in accordance with both the amended National Policy Statements (NPS) and National Grid's own Responsible Business Chapter. However, the recent Non-Statutory Consultation for LionLink put forward landfall and cable route options which would not allow coordination with the Sea Link proposals.

- 4.22 The alignment of project development and consenting by the National Grid Group would potentially allow the Planning Inspectorate (PINs) to consider both projects simultaneously, using a single panel of examiners to achieve coordinated consenting. This approach not only would reduce the impact of the consenting process on communities and statutory consultees, but it would also allow for a more efficient and effective examination of the issues relating to coordination and cumulative impacts and therefore could significantly improve public confidence regarding the consenting and delivery of these projects.

Cumulative Impacts

- 4.23 Current timelines suggest that Sea Link will be under construction alongside several other NSIPs in the same area, including Sizewell C, LionLink and those promoted by Scottish Power Renewables (SPR).
- 4.24 Notwithstanding the proposed extension to the core working hours, significant impacts are expected with regards to traffic on the routes leading to, and in proximity, to the Suffolk Coast, local housing, services, and labour supply.
- 4.25 The County Council encourages NGET to continue discussions with other developers scheduled to be undertaking construction at the same time, including Sizewell C, National Grid Ventures, and Scottish Power Renewables to minimise highways impacts on the host communities with regards to requirements for materials and associated HGV movements, workforce numbers and traffic management on the highways network.
- 4.26 The accumulation of several NSIPs under construction at the same time is expected to impact tourism both in visitor perception and visitor numbers on the Suffolk Coast, and the County Council considers it essential that the promotor engages with local businesses and the host communities to discuss potential impacts and community benefits.
- 4.27 The applicant should identify businesses, in particularly associated with recreation and tourism in close proximity to the red line boundary of the scheme, to assess potential impacts to these organisations of the construction works and access routes.

5 Overview of the County Council's Position on the specific proposals

5.1 The County Council raises a holding objection to the Sea Link proposals for the following reasons: -

River Fromus Crossing

- The emergence of the preferred access option and in particular the significant impacts of the proposed River Fromus crossing, documented in this response, provides a disproportionate solution in creating a permanent access to the converter station site.
- The County Council expects the promoter to complete a comprehensive assessment of alternative access options and publish their findings publicly, prior to the DCO application, to justify the selection of the preferred route, including conclusive evidence that no less harmful options are viable.

Addition of 7am – 5pm on Sundays and Bank Holidays to core working hours

- The potential for construction activities to take place 7 days a week and Bank Holidays could leave host communities with very little respite from the impacts of the development of the Sea Link proposals, including disruption to local roads and PRow used for recreational activity at times when they are most frequently used and the associated impacts on local amenity, tourism and the mental wellbeing of host communities.
- This stance is consistent with the County Council's concerns raised in relation to the NGET DCO application for the Bramford to Twinstead grid reinforcement scheme.

5.2 In addition, the County Council continues to have concerns regarding: -

- the belief that Sea Link should fully coordinate consenting, construction, and operation, with the LionLink project and with the evolving proposals for the Nautilus project; and that it is the responsibility of National Grid Group to manage the operation of its subsidiaries to achieve this, to effectively minimise harm to the environment and communities of Suffolk.
- the need for a masterplan for the converter station site to manage placemaking of new large scale industrial infrastructure in an area where construction of this scale has not previously existed.
- the requirement to coordinate construction operations with other projects in the area, including Sizewell C and NGV projects, where possible, to minimise impacts on the surrounding transport network.
- The flood risk associated with the construction and operation of Friston substation which remains within the proposals for Sea Link, in the case that the substation is not delivered by the third party who has consent (Scottish Power Renewables (SPR)). Sea Link's Order Limits currently do not appear to provide sufficient space for drainage and mitigation which was secured under SPR's DCO consent for East Anglia One North and Two.

- the requirement that the promoter must provide management plans in outline at DCO stage, to be discharged in detail once main contractors are appointed following any consent. The Council considers that it would not be acceptable for final management plans to be secured only as part of the initial DCO submission.

6 Site specific key Issues raised by the technical comments

This section provides a brief summary of key issues raised by the technical departments of the County Council. These should be read in conjunction with the full technical comments on the proposals which can be found in Appendix A.

Archaeology

- 6.1 Geophysical survey has been completed for the majority of previous order limits, showing multiple areas of previously unknown features of likely archaeological origin.
- 6.2 In communication with NGET's consultants, two phases of trial trenching prior to the final application have been agreed with Phase 1 starting in July 2024. The Written scheme of Investigation (WSI) for Phase 1 has been approved. These phases cover a large proportion of the order limits. Any remaining areas within the order limits not included in Phase 1 or 2 trenched evaluation will require evaluation if consent is granted.
- 6.3 All haul roads and compounds etc. will need suitable evaluation and mitigation. Haul roads and access for recent NSIPs have been completely destructive, the assumption should be that they will be destructive unless proved otherwise.
- 6.4 The field at TM4402858566 is a large addition. The County Council would recommend that as elsewhere, this receives geophysical survey in advance of trial trench evaluation to understand what archaeology exists, its significance and preservation, and to inform possible mitigation. There is a possible ring ditch/barrow (FRS 015) at the centre of the site, with possible mound still in existence, which suggests that further remains (including human remains) may be present.

Ecology

- 6.5 The County Council understands that ecological survey work is ongoing but have yet to see any results or analysis of the full suite of surveys.
- 6.6 Whilst the County Council welcome an enhancement of the riparian habitat at the River Fromus, there is concern that an important Chestnut tree is right in the path of the proposed bridge over that River. Although issues relating to trees will fall within the remit of East Suffolk Council, The County Council would like to see how the loss of this important tree can be avoided and what the compensation will be should that not be possible.

Highways

B1121 South Entrance, Saxmundham, embankment and bridge over the River Fromus

- 6.7 The County Council notes that the rail bridge between the proposed access and the A12 has restrictions for Abnormal Indivisible Loads (AIL) due to ongoing concerns regarding its structural condition. Access for large or heavy vehicles via Saxmundham would not be considered viable.
- 6.8 Regarding the proposed River Fromus crossing, the County Council would require clarification from the applicant regarding access for construction of the bridge. A route will be required to service the eastern embankment and bridge abutment and it is unclear whether this would be via the B1119 or B1121. This would potentially contradict the statement made within the PEIR Table 1.1 which states that construction traffic would not use the B1121, The Street, Sternfield.
- 6.9 The Draft Order Limits do not appear to allow space for landscaping to mitigate the visual impact of the access road on the eastern side of the valley, particularly as the update document plans show the road is on a slight spur.
- 6.10 The same plan also appears to show the attenuation ponds for the access road to be beyond the permanent access limits of deviation (indicated by a yellow dashed line).
- 6.11 As Local Highways Authority (LHA), the County Council would expect the applicant to demonstrate the resilience of this link in terms of flood risk and long term maintenance to provide reassurance that it will remain viable and that operational access will not be required from elsewhere on the local road network, for example, the cross sections of the bridge and embankment do not show potential flood levels and it is unclear what load category the bridge will be designed to and whether it will take the maximum expected AIL loading.

Joint Emergency Planning Unit

- 6.12 The County Council has a statutory duty under Radiation Emergency Preparedness and Public Information Regulations 2019 (REPPPIR 19) to consider the development with respect to the existing Sizewell off-site emergency plan due to the proposed site(s) being within 10 km within the Extended Emergency Planning Zone for Sizewell B power station.
- 6.13 The Sea Link proposals alongside other concurrent projects in the area are within the Extended Emergency Planning Zone (as identified in the Suffolk Radiation Emergency Plan) and will place significant challenges on the emergency services and other agencies' ability to respond to emergencies in this area. In particular, the A12, A1094, B1119 and B1121 form important emergency routes for access or evacuation from the area around Sizewell B.
- 6.14 Construction traffic movements need to be coordinated with other projects to minimise adverse impacts to the radiation emergency plan and the ability of the emergency services to respond to an incident at Sizewell B.

Landscape

- 6.15 The County Council notes that it appears that a considerable amount of land has been removed from the draft order limits, where it was previously proposed to create open access land for the use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.
- 6.16 It is anticipated that the proximity and proposed scale of the River Fromus bridge, its approaches, and the resultant substantial and permanent loss of existing wooded vegetation would result in even greater significant adverse effects on the local landscape character and the setting of Hurts Hall as well as St John The Baptist's Church, Saxmundham (Grade II* Listed Building) than previous proposals. There is particular concern for a centuries-old Chestnut tree, which could be of national significance, which is located within the access corridor.
- 6.17 The County Council must reiterate the importance of a clear vision for the landscape for the whole of the project, in particular for the converter station site. The development and design of the converter station site should include additional opportunities for recreation and other community benefits and should be developed with input from the local communities, through proactive engagement with Saxmundham, Benhall and Sternfield. The County Council is concerned that the reduction in the draft order limits in this location is moving away from this approach.
- 6.18 Regarding the proposed River Fromus bridge crossing, the land to the south of Saxmundham and east of the B1121 was identified as sensitive by the Suffolk Coastal Settlement Sensitivity Assessment (2018) due to the views of Hurts Hall, St John the Baptist Church, and the town beyond. The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus valley.

Public Rights of Way (PRoW)

- 6.19 The County Council welcomes that the emerging design now has fewer temporary PRoW diversions and closures.
- 6.20 The County Council is also pleased that PRoW are correctly labelled in the Additional PEIR Version A, in accordance with the SCC Definitive Map
- 6.21 The County Council continues to request that PRoW and amenity are dealt with in their own chapter within the Environmental Impact Assessment (EIA), rather than being distributed across various chapters, in order that potential impacts on PRoW can be properly understood.
- 6.22 The reduction of the Draft Order Limits appear to have limited the applicant's ability to provide effective mitigation for the permanent diversion of the public footpath to Sternfield, and the temporary diversion of the footpath that connects Saxmundham to Friston and communities to the east.

- 6.23 The reduced Draft Order Limits will also restrict opportunities for mitigation, for example around the north of the converter station site along the B1119, through the converter station site and beyond.
- 6.24 Any alternative provided PRow must be set within a screened and landscaped corridor and not feel constricted or unsafe for users. It is important to state that these routes are not just for recreation and holistic amenity, but they also form routes for Non-Motorised Users (NMU) to access local facilities and employment.

Suffolk Fire and Rescue (SFRS)

- 6.25 SFRS need to ensure that RVPs, access, and water supplies are appropriate for each work location and consider the final operational use and arrangements. Increased pressure is being placed on SFRS to consider the effects of our actions and tactics and these proposals and other National Infrastructure Projects must assist SFRS take appropriate and effective action in the event of an incident without having to mitigate control measures that were omitted.

7 Appendix A – Detailed Technical Comments

Introduction

- 7.1 The County Council has gathered technical comments from its technical departments regarding the details contained within the Targeted Consultation.
- 7.2 The full list of technical comments are as follows:
- Archaeology
 - Ecology
 - Highways
 - Joint Emergency Planning Unit
 - Landscape
 - Lead Local Flood Authority
 - Public Rights of Way
 - Suffolk Fire and Rescue

8 Archaeology

These comments are in addition to those provided to the 2023 Statutory consultation.

- 8.1 Geophysical survey has been completed for the majority of previous order limits, showing multiple areas of previously unknown features of likely archaeological origin.
- 8.2 In communication with Aecom and Stantec/Oxford Archaeology, two phases of trial trenching (informed by the geophysics results where available) prior to the final application have been agreed with phase 1 starting in July 2024. The Written scheme of Investigation (WSI) for Phase 1 has been approved. These phases cover a large proportion of the order limits. Any remaining areas within the order limits not included in Phase 1 or 2 trenched evaluation will require evaluation if consent is granted.
- 8.3 All haul roads and compounds etc. will need suitable evaluation and mitigation. Haul roads and access for recent NSIPs have been completely destructive, the assumption should be that they will be destructive unless proved otherwise.
- 8.4 The field at TM4402858566 is a large addition. At 7ha the County Council would recommend that as elsewhere, this receives geophysical survey in advance of trial trench evaluation to understand what archaeology exists, its significance and preservation, and to inform possible mitigation. There is a possible ring ditch/barrow (FRS 015) at the centre of the site, with possible mound still in existence, which suggests that further remains (including human remains) may be present.

- 8.5 We understand from recent meetings that NGT (Sea Link) and NGV (LionLink) are looking into a data sharing agreement. The County Council would support this as it would avoid duplication of effort. We would further recommend that the northern part of the substation site (covered in part by the Phase 2 trenching) be evaluated at the same time as LionLink due to apparently complex and potentially significant features revealed by geophysics. It is highly likely that mitigation in this area over these remains will have to be undertaken in once instance by both Sea Link and LionLink at the same time.
- 8.6 Most of the Friston Substation site has been evaluated by Scottish Power Renewables (SPR) with mitigation areas defined. Additional areas as part of Sea Link will require evaluation (to inform any mitigation) proportionate to size and impacts.
- 8.7 Where order limits overlap with other schemes (notably LionLink and East Anglia 1N and 2) the applicants should negotiate responsibility for archaeological evaluation and mitigation.

Comments on Additional Preliminary Environmental Information document

- 8.8 1.7.40 “However, it is assumed that the new features recorded would not be of national significance based on current information,” this cannot be confirmed until trial trenching has been carried out.
- 8.9 1.7.42 It cannot be assumed that topsoil stripping is not destructive to existing remains. understating of the nature and preservation of archaeological remains including depth and cover is essential.

9 Ecology

- 9.1 The County Council has attended a meeting with Sea Link’s ecology consultants, AECOM where the changes have been explained and has also attended (and continue to attend) Suffolk Ecology Thematic Meetings.
- 9.2 Ecological survey work continues, although the County Council have not yet seen the results and analysis of the full suite of surveys.

The changes, as far as Suffolk is concerned, include:

- Re-defining the Red Line Boundary, East of the Leiston Road, where it is in the vicinity of the Minsmere-Walberswick SPA (by narrowing the required corridor).
 - An area for delivering additional habitat for biodiversity alongside the River Fromus.
- 9.3 The intention behind reducing the red line boundary in order to mitigate potential disturbance (vehicle noise, human movements, dust, drilling operations and construction.) is welcomed but the County Council is concerned as to how much difference this is likely to make in actuality. The whole mitigation package to reduce loss, damage and disturbance should set out how mitigation is to be achieved.

- 9.4 Whilst the County Council also welcome an enhancement of the riparian habitat at the River Fromus, there is concern that an important Chestnut tree is right in the path of the proposed bridge over that River. The County Council would like to see how the loss of this important tree can be avoided and what the compensation will be should that not be possible.
- 9.5 Another matter that has become known since the County Council's earlier representations is that the existing route shows an area of scrub and trees with the alignment apparently "threatening" the line of trees to the West of Leiston Road (and at the Southern extent of the RLB). Can loss or harm to these trees be avoided by a modest re-routing a little to the North?
- 9.6 These comments aside, the County Council's comments remain as they did in the Statutory Consultation response.

10 Highways

The County Council as the Local Highway Authority (LHA) makes the following comments.

Access points

B1122 Leiston Road, North of Aldeburgh

- 10.1 As stated in previous responses (e.g. PEIR) concerns were raised regarding access for HGVs via the roundabout at the A1094 / B1122 junction in Aldeburgh during the EA1(N) / EA2 examination. Access from the north is similarly constrained by narrow roads in Leiston. Aldringham Lane between the B1122 and B1069 in Aldringham is unsuitable for construction traffic. To the west of the B1122 at the access point there are several mature trees that are likely to require removal to provide adequate visibility at the junction.

B1069 Snape Road, South of Knodishall

- 10.2 Although subject to review of the access design the proposed access on the B1069 appears feasible, However, the LHA notes that SPR are constructing an access and site compound further north and would seek clarification that use of the SPR access and compound has been considered as an option to reduce the combined impact of this project with the SPR ones, noting that this would still require a crossing point for the haul road and cables.

U2301 Grove Road, Friston

- 10.3 Access for any construction vehicles from the south through Friston is not considered acceptable due to the narrow road widths, sharp bends, and lack of segregated facilities for NMU. Access from the north is still difficult due to the narrow road width. The lane itself has been designated as a quiet lane. The proposed access is located close to a bend, and it may be difficult to provide adequate visibility particularly to the south. Some vegetation removal will be required along the eastern verge.

U2329 School Road, North of Coldfair Green (Knodishall)

10.4 The order limits appear to show access gained off School Road. Whilst noting that there is a field entrance here the access may not be appropriate for use by construction traffic and that and changes will impact the footpath that is located here (Knodishall Footpath 18).

B1121 Saxmundham Road, North of Friston

10.5 Whilst a field access is present at or close to the proposed access for pylon modification works to the southeast of pylon 4ZW022 the County Council would ask clarification as to why access cannot be gained from the main substation site which would remove the need for this access. Despite the presence of the field access, it is likely that visibility will need to be improved which will require removal or cutting back of significant areas of vegetation.

10.6 The order limits indicate that the private access to Red House Farm may be an option for access to the project. The applicant is reminded that whilst existing access may be present these may not be suitable and / or require improvement for use by construction traffic associated with this project and that Friston Footpath 16 shares the farm track to the north. The B11212 both north and south of the access is not suitable for construction traffic.

U2326 Church Road Friston

10.7 The County Council notes that the order limits include an area at the ford on Church Road and that the plans indicate that the site drainage is for attenuation rather than infiltration and that the applicant may be following a similar design process to SPR i.e. a drainage outfall passing under Church Lane. The applicant's attention is drawn to the difficulties identified by SPR in the EA1(N) / EA2 examination and since, specifically the limited cover to any drain and the proximity of other buried apparatus.

B1119 Leiston Road, east of Saxmundham

10.8 The applicant has not identified where access will be taken off this road. There are a number of existing field and private access which looking at the order limits may be used for access. The applicant is reminded that whilst existing access may be present these may not be suitable and / or require improvement for use by construction traffic associated with this project. The LHA notes that construction traffic accessing the site from the B1119 would have to pass through either Saxmundham or Leiston. The LHA would have concerns regarding this due to the evolved nature of the roads and junctions particularly in the two town centres. The B1119 forms an important emergency route for access to or evacuation from the area round Sizewell B.

B1121 South Entrance Saxmundham, embankment and bridge over the River Fromus.

- 10.9 The County Council notes that the rail bridge between the proposed access and the A12 has restrictions for Abnormal Indivisible Load (AIL) movements due to concerns about its structural condition. Access for large or heavy vehicles through Saxmundham would not be regarded as a viable option.
- 10.10 Aside from the County Council's concerns about the environmental impact of the proposed bridge and embankment The County Council would require clarification from the applicant regarding access for construction of these. A route will be required to service the eastern embankment and bridge abutment and it unclear if this will be from the B119 or B1121. This questions the statements made in the Additional Preliminary Environmental Information table 1.1 which states that construction vehicles would no longer use B1121 The Street Sternfield. The order limits do not appear to allow space for landscaping to mitigate the visual impact of the access road on the east side of the valley particularly as the plans included in the Project update document show the road is on a slight spur according to the contours. The same plan appears to show that the attenuation ponds for the access road are not within the permanent access limits of deviation (yellow dashed line). As LHA, the County Council would expect the applicant to demonstrate the resilience of this link in terms of flood risk and long-term maintenance to reassure the authority that it will remain viable and operational access will not be needed from elsewhere on the local road network. For example, the cross sections of the bridge and embankment do not show potential flood levels and it is unclear what load category the bridge will be designed to and that will take the expected maximum AIL loading.

Additional Preliminary Environmental Report

- 10.11 Table 1.1 states that there is a reduction in the adverse impacts on traffic and transportation during construction as a result of the changes. Whilst the reduction of construction traffic on some routes may mean this is the case it is likely that at least some of this traffic may be redirected onto other routes and the impacts may be greater, for example on the B1121 between the A12 and the proposed access to the Fromus Bridge access route. However, no further comment can be made until the detailed data and assessment is available.

Extended working hours

10.12 As LHA has significant concerns with the extension of working hours to include Sundays and Bank Holidays. This could result in communities having no respite from construction traffic, impact PRoW and roads used for recreational purposes at times they are most frequently used, in turn affecting the tourist industry. The potential for this to be a significant impact is recognised by the applicant in 1.3.18 of the executive summary. These impacts should also be considered cumulatively with other NSIPs both in terms of geographical proximity or overlap of construction but also in terms of repeated impacts on communities if projects are delivered sequentially, for example the loss cumulative of amenity and health benefits as PRoW are closed, reopened, and closed again which will discourage users.

11 Joint Emergency Planning Unit

11.1 SCC has a statutory duty under Radiation Emergency Preparedness and Public Information Regulations 2019 (REPPiR 19) to consider the development with respect to the existing Sizewell off-site emergency plan due to the proposed site(s) being within 10 km within the Extended Emergency Planning Zone for Sizewell B power station.

11.2 Prior to commencement, an emergency plan for the construction would be required which covers arrangements for protecting construction staff during any site or radiation emergency and it shows the development does not adversely affect the existing radiation emergency plan which coordinates the activities of the emergency services and other agencies in response to an incident at Sizewell B.

Transport and traffic control measures

11.3 This project and other concurrent projects and the associated work to enhance existing road and rail infrastructure in this area taking place in the Extended Emergency Planning Zone (identified in the Suffolk Resilience Forum Radiation Emergency Plan), will place significant challenges on the emergency services and other agencies' ability to respond to any emergencies in this area. In particular the A12, A1094, B1121 and B1119 form important emergency routes for access to or evacuation from the area round Sizewell B.

The movement of construction traffic will need to be coordinated with other projects and normal and recreational traffic movements to ensure that these do not have any adverse impacts of the effectiveness of the radiation emergency plan and the ability of the emergency services to respond to an incident at Sizewell B and also to conduct an effective evacuation.

12 Landscape

Based on the information provided by the applicant and two site visits to the general area during the Non-Statutory Consultation process (on 17/06/2022 and

10/11/2022) and one site visit during the Targeted Consultation Period (17/07/2024), I offer the following comments without prejudice to any further comments I or any other Suffolk County Council Officer may wish to make, as further detailed information with regards to the project becomes available.

The following comments are in addition to previous comments provided at the Non-Statutory and Statutory Consultations, which remain valid, except where they are clearly superseded by these additional comments.

12.1 The following comments refer to the Changes to Order Limits Plan, Issue A, 28/06/2024, and the General Arrangement Plan Series for Consultation, Issue B, 28/06/2024 and to information provided by the Applicant in the Additional Preliminary Environmental Information.

Sheet 1

12.2 The County Council welcomes the removal of the northern access option from the draft order limits.

Sheet 2

Reduced land take north of the proposed converter station

12.3 While the County Council recognises that order limits should not take more land than necessary to enable the proposed scheme, it appears that a considerable amount of land has been removed from the draft order limits, where it was previously proposed to create open access land for the use by residents of Saxmundham. Providing an open access for recreational use seemed a reasonable approach and offer to the community to mitigate and compensate for the impacts on the local rights of way network resulting from the proposed scheme, irrespective of the potential co-location of other schemes.

12.4 The strip of land along of the B1119, which remains within the order limits does not appear sufficient to accommodate substantial planting (tree belts) and an additional Public Right of Way that would provide, at least, for example, a circular route from Saxmundham, as shown in the Indicative Landscaping Strategy.

12.5 As previously stated, the County Council considers that a clear vision for landscape for the whole project, and in particular for the converter station site will need to be developed for the ES.

12.6 The Saxmundham Converter Station Indicative Landscaping Strategy with Colocation (Figure1.4.6) and the design principles for the landscape strategy

(PEIR Volume: 1 Part 2 Suffolk Onshore Scheme, Chapter 2 Landscape and Visual, pages 74 and 75) were welcome, but The County Council considered that these would need to be augmented to reflect the requirements for ecology (habitat connectivity, Biodiversity Net gain) and recreation and public amenity (PRoW), as well as reflecting potential archaeological constraints.

- 12.7 The County Council considered that the opportunities for recreation should be further developed, and that the loss of footpath connections would need to be fully assessed and mitigated.
- 12.8 The County Council still considers that the development and design of the converter station site, including additional opportunities for recreation and other community benefits, should be developed together with the local communities, through pro-active community engagement with the parishes of Saxmundham, Sternfield and Benhall.
- 12.9 With the revised Draft Boundary Limits it appears that the Applicant is moving further away from these recommendations.

Additional access

- 12.10 The additionally proposed access route from The Street, Sternfield (B1121) should be moved to avoid mature vegetation and utilise gaps, where vegetation can be more easily reinstated (third turning coming from The Street).

Permanent River Fromus crossing for access, including bridge

- 12.11 The land to the south of Saxmundham and east of the B1121 with views to Hurts Hall, St John The Baptist's Church, and the town beyond was identified as sensitive by the Suffolk Coastal Settlement Sensitivity Assessment (2018), which was undertaken to support the Suffolk Coastal Local Plan. The area is identified as 'important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus Valley.' The rural character, valued views and historic associations make this an intrinsically sensitive landscape.
- 12.12 It is noted that substantially more land is now included in the draft order limits along the River Fromus (albeit for ecological enhancement) and that the proposed access route and bridge are now considerably closer to Hurts Hall (Grade II Listed Building), within the remnant parkland landscape, and increased in scale.
- 12.13 It is anticipated that this proximity, together with the size of the bridge and its approaches, and the substantial and permanent loss of existing wooded vegetation would result in even greater significant adverse effects on the local landscape character and the setting of Hurts Hall as well as St John The Baptist's Church, Saxmundham (Grade II* Listed Building) than previous proposals. There is particular concern for a centuries-old Chestnut tree, which could be of national significance, which is located within the access corridor.

12.14 The latest proposals would also increase the significant adverse effects on The Layers (a non-designated Heritage Asset, identified in the Saxmundham Neighbourhood Plan and identified as a Suitable Alternative Natural Greenspace (SANG) In Policy SCLP12.29 South Saxmundham Garden Neighbourhood, part v, in the Suffolk Coastal Local Plan, 2020) and important public views from the B1121 and The Layers (Views 1a), 1b) and 2), identified in the Saxmundham Neighbourhood Plan, 2023).

13 Lead Local Flood Authority (LLFA)

13.1 Broadly speaking the proposals are similar to that assessed during the statutory consultation phase. The LLFA reinforces Highways comments re the church road crossing into the Friston main river and that close consultation should be undertaken with SPR to ensure that the drainage design direction is best informed by the investigation work currently being undertaken on-site in Friston. It would also be useful to have updated plans showing the local watercourse network etc.

In relation to previous Statutory Consultation comments:

PEIR Volume 1, Part 2, Chapter 5

13.2 Existing flood risk and Land Drainage – fails to acknowledge historic surface water flooding downstream in Friston. This should include reference to multiple Section 19 investigations by Suffolk County Council as Lead Local Flood Authority under the Flood & Water Management Act 2010. SCC LLFA have also produced a Surface Water Management Plan (SWMP) for the Friston catchment, which is available to the project promoter (should they not already have it), to enable them to assess existing surface water flood risk in the Friston catchment.

13.3 2.5.8.2 – States that work is located in areas to avoid risk of flooding, but the proposed sub-station is located directly over an ordinary watercourse. A surface water flow path adjacent this watercourse has been identified as part of the SWMP developed by SCC LLFA, which would directly impact the chosen site location.

PEIR Volume 3, Part 2, Chapter 5 Figures – Figure 2.5.2

13.4 Only high-risk surface water areas are shown in the legend. I assume this relates to the national mapping definition of high risk i.e. locations with >3.33% AEP. Why has only this risk level been used? SCC LLFA recommend the use of the national mapping 'low risk' scenario as this is the most appropriate national scenario for the 1% + CC event. It is also worth noting that the 1% + CC event is included in the Friston SWMP.'

The promoter should have potentially addressed this issue as part of the update.

13.5 The general arrangement drawings have been updated to reflect what appears to be a viable discharge point to a watercourse that discharges to the river. There is some flood risk associated with this, but the promoter does not appear to have referenced this change anywhere that I can see (although I was aware it was coming). Also note the change from 'infiltration' to 'attenuation.'

14 Public Rights of Way (PRoW)

SCC PRoW & Green Access Response to Additional PEIR version A (July 2024)

Notwithstanding all previous responses supplied by SCC which cover Public Rights of Way (PRoW) and Green Access that are still applicable, relevant, required, and valid, SCC PRoW have the following comments to make on the targeted consultation on Sea-Link, July 2024:

- 14.1 The County Council welcomes that the emerging design now has fewer temporary PRoW closures/diversions.
- 14.2 The County Council further welcomes that PRoW are correctly labelled in accordance with Suffolk County Council (SCC) Definitive Map conventions in the Additional PEIR version A (July 2024) and on the presentation maps and hope this is continued in the Environmental Statement.
- 14.3 The potential for additional routes and connections is also welcome, and the County Council will be specifically expecting improved user connectivity between Sternfield, Saxmundham and Friston.
- 14.4 However, the County Council has significant concerns regarding Sunday and Bank Holiday working. Whilst recognising the comments on reducing construction traffic at these times, the area is partly within the Suffolk & Essex Coast & Heaths National Landscape and is highly used by tourists and locals. Some of the PRoW in particular are busy at these times and the County Council sees uplifts in cyclists, walkers, and horse riders on our network by local residents, visitors, and holiday makers. Sunday and bank holiday working is therefore likely to have a greater impact on Non-Motorised Users, as defined as walkers, wheeled users, cyclists, equestrians, and carriage drivers (NMU) and recreational use of PRoW and greenspace.
- 14.5 The reduction of the order limits at Saxmundham appear to have significantly limited the ability of the applicant to provide effective mitigation for the permanent diversion of the public footpath to Sternfield (E-491/005/0 (S-P21)), and the temporary diversion of the footpath that connects Saxmundham to Friston, and to the communities to the east (E-460/023/0 (S-P20)). The reduction in the order limits has reduced the capacity and/or potential to deliver mitigation works by creation or diversion. These reduced limits will restrict opportunities later, for example around the north of the converter site along the B1119, through the converter site and beyond. It is unclear as to the widths of the corridors being provided through the Saxmundham converter stations site, but any alternative PRoW must be set within a screened and landscaped corridor and not feel constricted or unsafe. These routes are not just recreational routes and holistic amenity, but they also form routes for NMU's to access local facilities and employment. Opportunities should be explored to extend these routes to allow NMU's safer access to Saxmundham, Leiston and Friston on alternative routes other than carriageway.
- 14.6 Where the County Council seeks permanent PRoW diversions or creations, the order limits should be adapted to include these where necessary.

- 14.7 The County Council attaches importance to dedicating open access under the Countryside & Rights of Way Act 2000 s.16 where there is an intention to provide a space available to the public, for example grassland. The County Council welcomes the applicant's acceptance to this principle as set out in the transport meeting note dated 16/07/2024 reference 03, and there is an opportunity to undertake this to avoid a corridor affect though the converter and construction areas of the Saxmundham converter site.
- 14.8 Surveys of the existing routes need to be undertaken and included in the methodology set out in the proposed PRow management plan in collaboration with SCC PRow & Green Access and should include days and hours to encompass the user type and times. For example, at least one weekday and one weekend day, from dusk to dawn, in the recommended periods for data collection of spring and autumn, which include the neutral months of April, May, June, September and October.
- 14.9 When assessing PRow usage, the applicant should work with the County Council to agree what are the priority PRow.
- 14.10 The latest plans submitted in the Additional PEIR version A (July 2024) do not show the PRow routes in a clear and easy way to interpret. The County Council expects these plans be presented in a clearer way with clear colours, labelling with widths and distances. This also includes information on what the routes are bounded by. For example, grassland, hedges, or fences. The applicant should show PRow on an interactive map as a separate layer.
- 14.11 Access roads should have separation from the PRow to avoid conflict and maintain a safe route for NMU's.
- 14.12 Further information will be required on the location of diversions/closures, the length of time of diversions/closures and sequential closures which will lead to significant disruption on the PRow network. The County Council will seek mitigation and compensation for the significant impact of the development. The PRow closures to in the area of the proposed converter station at Saxmundham and the National Grid Substation at Friston will be significant impacts on the PRow. Mitigation should include enhanced green access links between communities such as Saxmundham, Sternfield and Friston.
- 14.13 The applicant should provide detail of the widths of the proposed haul roads, and there may be opportunities to create new PRow adjacent to these routes. The applicant should refer to County Council guidance on the management of PRow affected by new developments and refer to the Rights of Way & Access team when further information is required. For example on the distances new planting or fencing should be away from PRow.
- 14.14 To minimise disruption on the PRow network in the future on all routes including any new mitigation routes, cabling should be designed to cater for further schemes to the region, for example LionLink and Nautilus, this could also reduce the trenching across the PRow.

- 14.15 Please refer to the County Council's PRow NSIP guidance link: <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips/nsip-information-for-developers-and-project-promoters>.
- 14.16 The County Council's strong preference is PRow and amenity should be dealt with in their own chapter of the Environment Impact Assessment (EIA), in order that the impact of a scheme on the rights of way network and its receptors can be properly understood. This includes the interactions between different parts of the scheme.
- 14.17 The EIA methodology should consider the combination of effects that will impact (negatively or positively) on the quality of the amenity experienced by the receptors, i.e. walkers, cyclists, questions, wheeled users) as well as the effect on the physical resource (PRow, Open Access land).

Site specific comments:

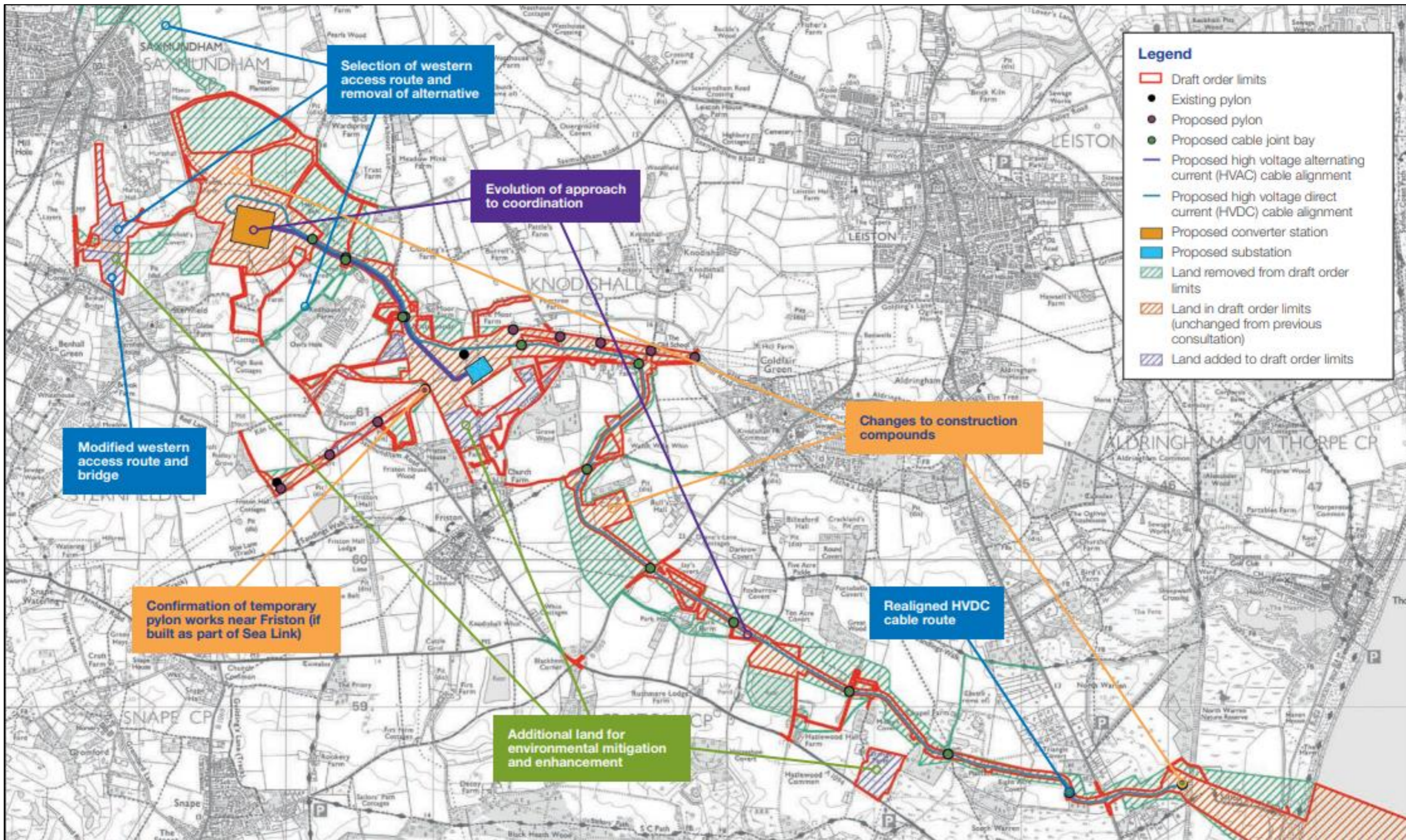
- 14.18 The order limits appear to show access gained off School Road. Whilst noting that there is a field entrance here the access may not be appropriate for use by construction traffic and that and changes will impact the footpath that is located here (E-354/018/0 Knodishall Public Footpath 018).
- 14.19 Where the County Council considers suitable mitigation for the impact of the NSIP on PRow and other green access is not appropriate, it will seek financial compensation. Please see the County Council guidance "Public Rights of Way and Green Access Supplementary Guidance Document".

15 Suffolk Fire and Rescue (SFRS)

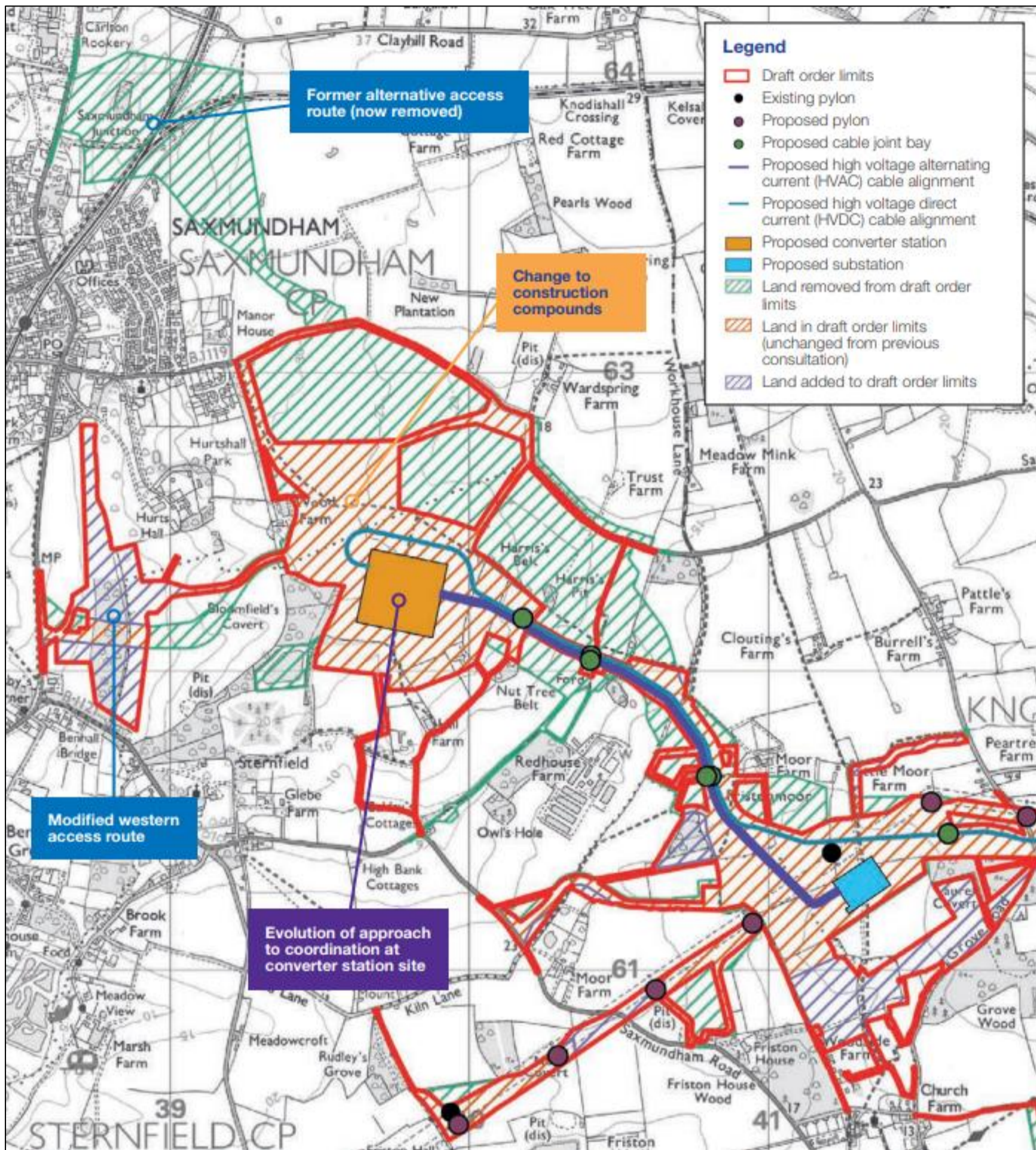
- 15.1 SFRS concerns or recommendations would be that any changes to footprint, use, occupancy, or access take into account the full weight of a blue light emergency response to an incident in any one of the locations.
- 15.2 SFRS need to ensure that Emergency Rendezvous Points (RVPs), access, and water supplies are appropriate for each work location and consider the final operational use and arrangements. Increased pressure is being placed on SFRS to consider the effects of our actions and tactics and this and other National Infrastructure Projects MUST assist Fire Service take appropriate and effective action in the event of an incident without having to mitigate control measures that were omitted control measure that initiatives like this should have built into the infrastructure at build stage.

Appendix C – Maps

C1 - Changes to Proposals Since Statutory Consultation



C2 - Permanent Infrastructure



BLANK