SUFFOLK ENERGY ACTION SOLUTIONS (SEAS)
Relevant Representation (RR):

CUMULATIVE EFFECTS INTER/INTRA
SEA LINK DCO

PINS Ref: EN020026 **IP Ref: F4BE0B552**

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RELEVANT REPRESENTATION: CUMULATIVE EFFECTS -SEA LINK (EN020026)
Submitted by Suffolk Energy Action Solutions (SEAS) - F4BE0B552

1. Executive Summary and Introduction

This Relevant Representation sets out SEAS's objection to the Sea Link NSIP (EN020026) (the Proposed Project) on the grounds of cumulative effects (also referred to as cumulative impact). The Proposed Project is one of multiple large-scale energy infrastructure projects targeting exactly the same area of rural East Suffolk — including East Anglia ONE North (EA1N), East Anglia TWO (EA2), Sizewell C, and LionLink. Together, these schemes will transform the character, landscape, communities and ecosystems of the Friston–Saxmundham area for more than a decade.

National Grid's Environmental Statement fails to assess these effects lawfully or credibly. The cumulative impact assessment (CIA) set out in the ES, ostensibly primarily in APP-60 (Inter-Project Cumulative Effects), and also APL-59 (Intra-Project Cumulative Effects), is fragmented, speculative, and systematically underestimates harm. It does not model realistic worst-case scenarios, disregards overlapping and sequential impacts on landscape, noise, ecology, traffic/transport, heritage, amenity, health and tourism (amongst others), and fails to offer coordinated mitigation. The approach does not comply with:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Reg. 14), including as clarified by the courts
- The relevant National Policy Statements EN-1 (2024), EN-3 (2024) and EN-5 (2024),
- Schedule 9 of the Electricity Act 1989.

Cumulative harm is particularly serious in the following areas:

- Irreversible industrialisation of the Suffolk Coast and Heaths National Landscape, causing permanent landscape and heritage harm.
- Loss of amenity, tranquillity, and health for rural communities, spread over so many years the adverse effects might as well be permanent – they are effectively generational.
- Fragmentation and degradation of habitats and protected species corridors
- Saturation of the rural road network and of local infrastructure.
- Erosion of the visitor economy and landscape-dependent employment.

Those are merely the most important. There are other adverse cumulative effects, such as heightened flood risk.

Nautilus, originally assessed as a relevant cumulative project, is now confirmed to land at Isle of Grain and has been excluded accordingly from this representation (albeit NGET continues to rely upon it for its need/justification case for the Proposed Project – amply demonstrating the weakness in NGET's case there).

While each project assesses only its own short-term construction window, the real-world experience for affected communities will be one of continuous infrastructure construction for over 10–12 years. The Applicant's own Coordination Document confirms overlapping timelines for Sea Link, EA1N, EA2, Sizewell C and LionLink. This decade-plus-long disruption brings not only visual and traffic impact but cumulative harm to mental health, biodiversity, tourism, local roads, and the regional economy — amounting to potentially over £500 million in lost tourism revenue if BVA BDRC estimates are extrapolated over 12 years.

SEAS submits that the Application for Development Consent should be **refused**, or at minimum **suspended**, pending a full and coordinated cumulative reassessment across all NSIPs affecting the East Suffolk region.

As the most basic level, this tsunami of energy infrastructure projects all in one area: Sizewell B, Sizewell C, EA1N and EA2, a National Grid substation, the Proposed Project and NGV's LionLink, is a disproportionate amount of infrastructure relative to this area and its rural context. "Energy Hubs" such as this belong in brownfield sites (already industrialised) not countryside locations.

Nor have the security risks of taking such a large proportion of Britain's energy through a single area, and predominantly through Friston as a cumulation, been properly considered.

SEAS' representations regarding cumulative effects are set out below. SEAS endeavours to follow the order of topics presented in the Applicant's ES, for ease of reference (the order of topics below is no reflection of a priority order on SEAS' part).

SEAS will, in due course, make fully detailed written representations on this topic, at the appropriate time.

2. Objections and Evidence

2.1 The Cumulative Impact Assessment (CIA) Is Fragmented and Incomplete

2.1.1 Despite the length of APP-060, and APP-059, there is no substantive assessment of anything beyond the Proposed Project in isolation in the ES (and that assessment itself is deeply flawed, as set out in SEAS' other topic specific representations). What is in APP-060, in particular, has neither depth nor substance. It is inadequate, given the temporal and spatial overlap with EA1N, EA2, LionLink and Sizewell C in the same impact corridor. APP-060 as a result either misses cumulative impacts, or is at pains to assess-away cumulative impacts as insignificant, wrongly so. The same is true of APP-059.

2.1.2 This is true of operational and construction cumulative impacts. But as regards construction, the CIA as a whole lacks any modelling of a worst-case scenario in which construction impacts from these NSIPs overlap. But even if they do not overlap, there is no adequate assessment of drawn-out sequential impact.

2.1.3 The CIA relies on speculative assumptions of project staggering to dismiss significance, without evidentiary basis.

2.1.4 Note that although Nautilus was included in the cumulative project list (short list), it has now been confirmed that it will not land in Suffolk and should no longer be considered relevant.

2.2 Landscape and Visual Cumulative Impact and Heritage Cumulative Impact

2.2.1 Please see SEAS' separate landscape/visual relevant representation, and in particular the June 2025 report of Michelle Bolger (MBELC 2025), and similarly SEAS' separate heritage relevant representation.

2.2.2 As regards landscape/visual, as is apparent from APP-060, not only is there nothing approaching a LVIA for each of the other projects considered there, nor, crucially, is there anything approaching a cumulative LVIA: as to this latter see in particular APP-060 Table 13.35 and Table 13.36, the cursory nature of which is obvious.

2.2.3 ZTV and visual overlap with Sizewell C, EA1N/2 and Friston substations are acknowledged but are not translated into a meaningful cumulative landscape character assessment. Similarly for visual impact.

2.2.4 As regards Saxmundham, the ES does not fully assess the cumulative visual and landscape impact of co-locating up to three converter stations. Only the possibility of LionLink is considered, and only in a markedly limited way in the key tables within the cumulative effects chapter (APP-060, Tables 13.35-13.36).

2.2.5 MBELC 2025 confirms that the combined presence of Sea Link, LionLink, and a third converter station would intensify landscape harm and should be assessed within the core LVIA, properly (what is in APP-060 is manifestly not an adequate assessment).

2.2.6 The CIA also downplays cumulative significance with EA1N, EA2 and LionLink by relying on landscape planting that will take 15 years to mature.

2.2.7 The failure to carry out and present an adequate CIA is particularly marked as affected areas include land within the Suffolk Coast and Heaths National Landscape (formerly AONB), now subject to enhanced policy protection.

2.2.8 As regards heritage cumulative effects, there is a particular issue here regarding under-and inadequate assessment of intra-project cumulative impacts. See SEAS' separate heritage specific representation.

2.3. Cumulative Ecology and Biodiversity Impacts

2.3.1 The application similarly fails to adequately assess the combined ecological impacts of Sea Link with EA1N, EA2, Sizewell C, and LionLink.

2.3.2 Effects on ecological receptors are screened out with little justification.

2.3.3 This does not meet the requirements of the EIA Regulations 2017.

2.3.4 Habitat fragmentation includes:

- Hedgerow/tree removal
- Acid grassland loss
- Haul road severance
- Inadequate mitigation

2.3.5 BNG offsetting shows no coordination across NSIPs.

2.3.6 The RSPB has also formally raised concern that the Sea Link application fails to adequately assess cumulative or in-combination impacts on designated sites and their features, or to demonstrate how this project will coordinate assessments and mitigation with other energy NSIPs.

2.3.7 The assessment conducted purportedly in compliance with the Conservation of Habitats and Species Regulations 2017 (the HRA) admits 2.5ha of acid grassland loss with only a vague restoration proposal.

2.3.8 This concern is shared by the RSPB, who note that habitat restoration strategies proposed in the application lack specificity and do not demonstrate how longer-term conservation objectives for protected sites such as Sandlings SPA and North Warren will be met.

2.3.9 The Proposed Project is functionally dependent on Nautilus, which has now gone, and LionLink, which proposes cable landfall within 100m of the Minsmere–Walberswick SPA/SAC. The rationale for the Proposed Project has already gone with Nautilus, and if LionLink fails to achieve consent or goes elsewhere, the Proposed Project's design rationale further collapses, but if LionLink goes where NGET's sister company NGV presently intends, the cumulative effects (combination effects) must be fully assessed (and they have not been).

2.3.10 The application is legally and procedurally deficient under the EIA Regulations, the Habitats Regulations, NPS EN-1 and the Electricity Act 1989, with concerns shared by the RSPB as a statutory nature conservation body.

2.3.11 The HRA fails to assess cumulative SPA risk.

2.3.12 The RSPB further notes the absence of any emergency response procedures or maintenance safeguards in the application documents, creating unassessed risks to designated habitats in the event of cable strikes, trench collapse, or operational failure.

2.4 Water Environment Cumulative Impact

2.4.1 NGET's Flood Risk Assessment (APP-292) and drainage design documents fail to include any cumulative hydrological modelling across its infrastructure components or phases — let alone between Sea Link and other NSIPs such as Sizewell C, EA1N/EA2, or LionLink – nor is this gap plugged by APP-059 or APP-060 (yet again, what is in those documents is cursory, rather than an adequate assessment). This omission breaches EN-1, and the requirement to consider downstream or offsite impacts, including from surface water and groundwater interactions. Put simply, dismissal of inter-project (see APP-060 Table 13.39) (and also intra-project) cumulative flood risks without proper justification or analysis, is in breach of EN-1 and NPPF policy.

2.4.2 The problems of cumulative assessment here flow from inadequacies in the individual project assessments.

2.4.3 For example, the proposed River Fromus crossing and associated works near tributaries (e.g. 11 temporary and 2 permanent culverts) are located in areas of recorded groundwater and surface water flood risk, yet the risk of contaminant mobilisation during flooding is not adequately assessed, and notably not adequately cumulatively assessed. This plays through across the different elements of the Proposed Project, and other projects. For cumulative effect with other projects, the assumptions in Table 13.39 is always that they will adopt embedded best practice: but if they, like the Proposed Project, are founded on an inadequate Flood Risk Assessment, that assumption is ill-founded.

2.4.4 For example, the Flood Risk Assessment for the Proposed Project concedes a medium residual risk during construction from groundwater and surface water flooding at specific locations, yet no mitigation is proposed beyond generic adherence to the Outline CEMP.

2.4.5 Similarly, the Proposed Project relies heavily on trenchless techniques to "avoid disturbance", but provides no quantitative evidence that such techniques will not affect groundwater quality or flow, especially in low-permeability tidal clays where breakthrough risk is high.

2.4.6 This is an area in which SEAS is waiting for a report from its instructed expert, so much reserve its position as regards the full extent of the failures in the CIA.

2.5 Cumulative Impact on Coastal Geology

2.5.1 The Inter-Project Cumulative Effects assessment (APP-060) fails to adequately address overlapping geological disturbance risks with the consented EA1N, EA2 and Sizewell C projects, particularly around the Friston Substation and Aldringham cable corridor.

2.5.2 As regards APP-059, the Intra-Project Screening Tables acknowledge overlapping impacts from noise, dust, groundwater pollution and visual intrusion on residential receptors, but dismiss these as “not significant” without justification or empirical thresholds.

2.5.3 No quantitative cumulative assessment is undertaken for hydrological drawdown effects or for the combined effect of multiple HDDs on aquifer pathways, groundwater pressures, or artesian flow.

2.5.4 The Coralline Crag formation near Thorpeness is a fragile, sand-based cliff system already subject to active erosion and collapse. Sea Link is now planned to reach landfall **just south of this feature, between The Scallop and Thorpeness**, placing geotechnically sensitive cliffs at increased risk. This stretch of coastline is already impacted by the landfalls of other NSIPs and lies within a complex and vulnerable sedimentary system.

2.5.5 The cumulative geotechnical risk from multiple NSIPs — including prior landfalls from EA1N and EA2 and future offshore cable works from Sea Link and LionLink — poses an unacceptable long-term threat to the Thorpeness coastal cliffs and their Coralline Crag formations. LionLink, although now expected to land at Walberswick, still contributes to wider sedimentary and hydrodynamic pressures along the Suffolk coast.

2.5.6 This risk was previously raised in SEAS’s submission to the EA1N/EA2 DCO Examination, but remains unassessed in Sea Link’s CIA, which fails to address the **specific geological vulnerability** of the Thorpeness landfall zone.

2.6 Cumulative Agriculture and Soil impacts

2.6.1 The Environmental Statement fails to present any substantive cumulative impact assessment specific to agricultural land, despite the overlapping geographic and temporal effects of multiple NSIPs in Suffolk—namely Sea Link, Sizewell C, EA1N, EA2, and LionLink.

2.6.2 The agriculture and soils chapter in the ES explicitly limits its scope to the Sea Link project alone and defers to other assessments, whilst the ‘assessment’ in APP-060 does not stand scrutiny. Bluntly, and as with the other effect areas, it is not a true

cumulative assessment at all. Table 13.40 does, at least, acknowledge a significant effect, but with so little detail as to be all but meaningless.

2.6.3 This approach, siloing any detailed assessment to the particular project itself, and presenting no proper cumulative assessment, fragments impact analysis and fails to comply with EIA Regulations 2017, which require that likely significant cumulative effects be assessed in full and in context.

2.6.4 The omission is especially serious given the wider pattern of permanent land loss, severance of farm units, and increased pressure on agricultural viability across East Suffolk due to multiple energy infrastructure projects.

2.7 Cumulative Traffic and Transport Impact

2.7.1 Cumulative HGV increases from Sea Link, Sizewell C, EA1N/EA2 and LionLink are substantial: +187.7% on B1121 Main Road, Saxmundham (east of A12), 164.8% on A1094 (between A12 and Snape Road Junction), +195.4% at B1121 Main Road/B1121 Church Hill Junction, 148.3% at A1094 Aldeburgh Road/B1121 Aldeburgh Road Junction.

2.7.2 Despite this, cumulative effects are uniformly dismissed by APP-060 as “not significant” without quantified assessment (see Table 13.41).

2.7.3 No combined mitigation strategy or multi-developer traffic coordination is proposed.

2.7.4 SEAS refers to its topic-specific representation concerning transport/traffic and the report provided by PJA. As PJA explain, the Applicant has adopted a project-isolated approach, omitting any shared transport impact model across overlapping NSIPs, and so failing to provide any adequate cumulative assessment.

2.7.5 The upshot is that the Applicant yet again either misses cumulative effects altogether, or unjustifiably downplays them.

2.8 Cumulative Air Quality Impacts

2.8.1 The inter-project cumulative assessment (APP-060) does not even purport to assess cumulative air quality effects, let alone assess cumulative effects from the overlapping Sizewell C, EA1N, EA2, LionLink and Sea Link construction periods, despite shared receptor areas such as the Stratford St Andrew. It simply presents a few lines under ‘health and well being’ (and see Table 13.44). This is (wholly) inadequate. The traffic volumes from the Proposed Project alone speak for themselves in terms of the pollution they will generate, not least particulates from

lorries. That effect will be magnified by cumulation with many other projects, either overlapping or sequential.

2.8.2 As for the intra-project cumulative assessment, this confirms that receptors will be simultaneously affected by multiple stressors, including air pollution, traffic, and noise. However, it downplays the significance.

2.8.3. The CEA methodology admits cumulative effects are considered only qualitatively and without combined modelling.

2.8.4 Yet again, the assessment falls well short of what law and policy requires.

2.9 Cumulative Impact Noise and Vibration

2.9.1 APP-060's approach to cumulative effects is, yet again, wholly inadequate. SEAS' separate representation on the noise and vibration topic, and the accompanying report from Mr Rupert Thornley-Taylor, identifies glaring deficiencies, and SEAS refers to those documents. By way of keen example, though, NGET APP-060 Table 13.42 has failed to even identify the possibility (let alone assess) cumulative acoustic impacts with the LionLink converter station also presently proposed by NGV for the Saxmundham site (only LionLink construction noise is even mentioned), let alone the third converter station NGET suggests could go there.

2.9.2 This violates both the EIA Regulations and NPS EN-1 which require assessment of cumulative and synergistic effects, particularly all those projects that can reasonably be foreseen as likely to proceed e.g. LionLink.

2.9.3 As for what is done at APP-060 Table 13.42, it is dismissive without justification, further contrary to legal and policy requirements.

2.9.4 The reality, yet again, is that the only project subject to anything that might merit the description assessment, is the Proposed Project, but even that is signally inadequate, whilst the 'assessment' of cumulative effects is nothing of the sort.

2.10 Cumulative Impact on Socio-Economics, Recreation and Tourism

2.10.1 It cannot be sufficiently stressed that the Proposed Project is part of a sequence of major energy projects (Sizewell C, EA1N, EA2, LionLink, Norwich-Tilbury) all targeting the Suffolk coast, plus with Norwich-Tilbury. The ES identifies these overlapping projects and their potential for cumulative effects, along with South Saxmundham Garden Neighbourhood, at APP-060, Table 13.43, but yet again the assessment is wholly inadequate.

2.10.2 Of particular concern to SEAS, is that the cumulative impact on tourism has simply not even been considered in Table 13.43. That table considers 'Residential

properties, business premises, visitor attractions, community facilities, open space and development land' as a single item, before moving on to footpaths, construction workface generation etc. That is not even identification of tourism as potentially affected, let alone a purported assessment. There is nothing, let alone anything assessed by any reasonable metric, whether that by be reference to reductions in visitor numbers, visitor spend, accommodation capacity pressures, or damage to tourist appeal. The ES fails wholesale to model combined impacts on any of these, and it is staggering tourism does not even merit its own line.

2.10.3 Back in 2019 the 2019 BVA BDRC report (the 'Energy Coast') quantified that the known NSIPs *then* could lead to £24m–£40m annual losses in visitor spending and 400–600 job losses in the tourism sector. Since then the known projects have only increased. That 2019 report is a considerable under-estimate now. The energy projects will genuinely turn the area into the 'Energy Coast', entirely to the disbenefit of a tourist sector that supports a very significant proportion of the workforce and drives the local economy.

2.10.4 Over 12 million day visitors came to East Suffolk in 2023 spending over £350 million pounds. Cumulative traffic disruption from the Proposed Project and other NSIPs will deter many from returning.

2.10.5 The DMO representation to this proposed DCO that SEAS has already seen, highlights that the Proposed Project adds to the cumulative impacts from NSIPs already acknowledged to threaten the visitor economy, but without any tourism mitigation fund or strategy from National Grid, unlike Sizewell C. SEAS agrees.

2.10.6 By way of compensation, as it were, National Grid estimates that the Proposed Project will create only 26 FTE jobs per annum for residents within the Study Area during the construction period - yet offers no mitigation for tourism loss.

2.10.7 Nor is there acknowledgement that Sizewell C will have already hired all suitable labour for this type of construction, limiting the Proposed Project's job benefits.

2.10.8 NGET must be sent back to start again on the assessment here, starting with tourism.

2.11 Cumulative Health and Wellbeing Impacts

2.11.1 Significant intra-project effects are acknowledged for communities in Saxmundham, Knodishall, Aldringham and Friston.

2.11.2 However, the CIA and ES as a whole fail to even begin to grapple with the combined mental health and wellbeing impact of multiple overlapping NSIPs in these communities (Sizewell C, EA1N, EA2, and LionLink). APP-060 Table 13.44 is dismissive to the point of omission, and non-compliant with EIA Regulations and NPS EN-1, both of which require assessment of these health effects.

2.11.3 The Proposed Project contributes to the cumulative creation of an enormous energy hub in the area, with construction lasting a decade or more, and rightly to be considered a generational impact.

2.11.4 Having these series of projects bearing down on them and stretched out over years represents a huge mental burden on the local community, which NGET wrongly treats as a nothing.

3. Overall Conclusion

3.1 The Application does not provide a lawful or credible cumulative impact assessment. It fails to model or mitigate the foreseeable cumulative effects of Sea Link in combination with EA1N, EA2, LionLink and Sizewell C, amongst others.

3.2 The cumulative assessment is fragmented, speculative, and inadequate. The parts of the ES that are purported concerned with assessment of cumulative effects, APP-059 and APP-060, are wholly inadequate. At no point do they come close to an assessment compliant with the requirements of law or policy even where they purport to assess cumulative effects, and they often do not even purport to do that, all as summarised above.

3.3 Amongst other things, the Applicant has:

- Failed to actually assess or model overlapping construction or operational effects on shared receptors, instead providing what are at best superficial assertions.
- Omitted to even consider key cumulative points (not least tourism as a discrete topic).
- Ignored the reality of receptor saturation across a range of effect areas, not least mental health. landscape, community, ecology and infrastructure.

3.4 The deficiencies affect all major impact areas, not least:

- Landscape and visual harm to the Suffolk Coast and Heaths National Landscape and to heritage,
- Noise, air quality and health risks to rural communities,
- Traffic overload and uncoordinated road disruption,
- Flood risk and groundwater pressures on shared hydrological systems,

- Fragmentation of habitats and biodiversity corridors,
- Erosion of the tourism economy and loss of recreational amenity.

3.5 The Applicant has also:

- Failed to provide any coordinated strategy for mitigating cross-project disruption, and, by reason of the above
- Undermined public confidence in the planning process by treating cumulative harm as incidental or negligible and ultimately not meriting actual assessment.

3.6 The Application is **non-compliant with**:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017,
- The updated 2024 National Policy Statements EN-1, EN-3 and EN-5,
- The legal duties of the developer under **Schedule 9 of the Electricity Act 1989**.

3.7 Properly understood and assessed, which the Applicant has not done, the cumulative burden of these overlapping projects on a small rural area is unmanageable, unmitigated and unjustified, and cannot be permitted. SEAS therefore submits that Development Consent should be refused.

End