Date: 29 August 2025
EA reference: XA/2025/100432/01

Sea Link Principal Areas of Disagreement Summary Statement

Environment Agency – registration number: F17C74352

The following terms have been used in the column headed 'Likelihood the concern will be resolved during the Examination' –

- Highly likely – where agreement should be possible, or a relatively simple change is required.
- Likely – where an issue is still being discussed, but we believe it can be resolved.
- Unlikely – where agreement on an issue is unlikely or it is difficult to identify a solution.

We have included a Relevant Representation Reference column. Please use this to identify which issues our principal areas of disagreement relate to in relation to our relevant representation submission (no.1586).

Outstanding principal areas of disagreement				
Relevant Representation reference	Area of disagreement	Summary of concern held by Environment Agency	Remedy measures required	Likelihood of resolution
Suffolk and Kent				
EA003, EA073, EA090 (Suffolk only), EA095 (Kent only)	Ecology (Water Framework Directive) Flood risk	Culverted crossings are proposed on ordinary watercourses. Culverts can increase flood risk, and lead to a deterioration in WFD water quality.	To resolve our concerns relating to WFD impacts, we require the project team to: • Consult with the Internal Drainage Board to determine if	High

			the culverts are justified on ordinary water courses. • Identify which ordinary watercourses fall within WFD classification, and which do not. We will defer to the Lead Local Flood Authority regarding flood risk implications of culverting on ordinary watercourses.	
EA027	Ecology (Water Framework Directive)	Sediments release at landfall locations hasn't been analysed. Sediment release may cause a deterioration in WFD waterbody quality.	Study and model suspended sediment modelling in landfall areas.	Medium
EA013	Ecology (Water Framework Directive)	The current designs of the Soffit heights over the river Fromus risk the WFD ecology status of the area. The soffit height of the proposed crossing will be too low to sufficiently allow the passage of WFD macroinvertebrate species. The project team disputes our evidence regarding the impacts of the proposed river Fromus crossing's soffit height on WFD macroinvertebrate species.	A precautionary principle will need to be applied to inform the soffit height of the River Fromus crossing. We would therefore require the inclusion of a requirement which includes the following: • a soffit height of at-least 5m • a monitoring plan, to investigate impacts to and; ○ if impacts are determined, then a contingency fund to help mitigate or compensate for these impacts	Medium
EA033	Water resources	The outline Construction Environment	A water supply strategy needs to be undertaken to assess volumes of water	Medium

		Management Plan (CEMP) does not include any planning provision for water supply.	required for consumptive uses and to options appraise the sources of supply that are available to meet demands during construction to include water company/mains supply, tankering, surface water or groundwater abstraction.	
EA065, EA066, EA068, EA069, EA070, EA084 (Kent only), EA089 (Kent only)	Flood Risk	Works within Flood Zone 3 lack detail, and do not have appropriate mitigation measures proposed.	A sequential approach to locating development outside of Flood Zone 3 or justification why it cannot be followed. Update the outline Construction Environment Management Plan to include: • Changes to ground levels • Commitment to floodplain compensation For further details see: EA065, EA066, EA068, EA069, EA070, EA084	Medium
EA050, EA051, EA054, EA055, EA056, EA057, EA058, EA059, EA060, EA061, EA062	Water Quality (Water Framework Directive)	**EA050** Groundwater bodies were screened out from the WFD Assessment. We did not agree to the screening out of the Groundwater Bodies when we were consulted on the Water Framework Directive Assessment Version: V01 January 2025 (refer to our response letter XA/2025/100236/01-L01, dated 11 February 2025.	Screen in impacts to Groundwater bodies within the WFD assessment. We would however accept the screening out of this issue, if the following documents are sufficiently updated (see further details below) to avoid deterioration in the WFD status of groundwater bodies: • Register of Environmental Action and Commitment (REAC) • Outline Code of Construction Practice	Low/Medium

			• Hydrogeological risk assessment For further details see: EA051, EA054, EA055, EA056, EA057,EA058, EA059, EA060, EA061, EA062	
Suffolk				
EA012, EA015, EA021	Ecology (Water Framework Directive)	Eel presence inappropriately characterised and impacts are not properly understood and mitigated for.	The following updates need to be made regarding Eel: • Correctly identify habitat and migratory routes. • Include Eels within the marine environment for protective measures in the Outline Code of Construction Practice/Register of Environment Actions and Commitments	High
EA011, EA016	Ecology (Water Framework Directive)	Records of European smelt omitted from reports, and impacts to them not appropriately assessed.	We require the following: • Include records of smelt sightings in the Alde/Ore Estuary and their migration route along the Suffolk Coast • Consideration of inter-cumulative effects of thermal impacts from Sizewell B and C.	High