

# **WRITTEN RESPONSE TO THE APPLICANT'S THEMATIC RESPONSES (REP1-116)**

Project: Sea Link EN020026

Deadline 2 – 9 December 2025

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IP No: [REDACTED]

## **1. CUMULATIVE IMPACT**

National Grid's responses consistently treat each category of harm in isolation, rather than acknowledging the clear and growing pattern of overlapping, long-term burdens on the communities affected by Sea Link. The Applicant repeatedly asserts that residual effects are "not significant", but this conclusion is reached only by examining each topic area separately. In reality, local residents experience noise, traffic, landscape change, ecological disruption, and loss of amenity simultaneously and over many years.

The cumulative picture across Suffolk is unmistakable: Sea Link sits within a cluster of major energy infrastructure schemes that already include Sizewell C, Scottish Power's projects, Friston Substation proposals, and multiple offshore connections. National Grid's responses do not seriously reflect the compounded stress these projects impose—whether environmental, psychological, economic or social.

The Applicant's approach also disregards how long-term the disruption will be. Construction compounds, haul roads, heavy vehicle movements, drainage failures, ecological disturbance, and depressed tourism revenue do not occur

neatly in sequence—they overlap and extend for many years. The claim that impacts are “temporary” is therefore misleading.

The Examining Authority should require the Applicant to produce a genuine cumulative impact assessment, covering all relevant NSIPs together, using realistic combined scenarios instead of theoretical, isolated averages.

## **2. ALTERNATIVE SITES AND NETWORK DESIGN**

The Applicant states that selected sites and routes are the “least harmful”, yet the evidence presented does not demonstrate that a full, transparent alternatives assessment was undertaken. Instead, National Grid appears to justify its preferred locations rather than objectively test other options.

Key issues include:

### **Lack of independent and structured comparison**

No scoring matrix, weighting system or transparent methodology is provided for how alternatives were evaluated. Without this, the community and the Examining Authority cannot see whether environmental and social harm were properly prioritised over operational convenience.

### **Avoidance hierarchy not followed**

Policy requires avoidance of harm as the first principle. Instead, the Applicant focuses on minimising or mitigating harm after selecting locations within floodplains, protected landscapes, Best and Most Versatile farmland, sensitive heritage areas and tourism zones. Avoidance would have meant choosing sites and corridors outside these areas in the first place.

### **Offshore and alternative landfall locations prematurely dismissed**

Offshore routing options and less sensitive landfall points appear to have been ruled out with limited justification. Given the clear environmental and

community concerns onshore, offshore alternatives should receive a far more rigorous, transparent appraisal—including climate-adapted scenarios for eroding coastlines.

### **Failure to consider regional cumulative burdens**

Communities in areas like Friston, Saxmundham, Pegwell Bay and Richborough are already disproportionately affected by multiple NSIPs. National Grid has not shown why alternative areas could not have borne some of this load, nor how its siting decisions account for long-term fairness.

Until a complete, independently scrutinised alternatives assessment is produced, there is no credible basis for concluding that the selected network design and locations represent the least damaging option.

## **3. TRAFFIC, DISRUPTION AND EMERGENCY SERVICES**

National Grid’s traffic assessments rely on modelling that does not reflect the real conditions of rural road networks in Suffolk. Local roads are narrow, heavily used by agricultural vehicles, school transport, cyclists and emergency services and lack resilience to disruptions.

The Applicant’s responses understate both the volume and the nature of construction traffic. HGVs, abnormal loads, contractor vans and support vehicles will converge on constrained lanes daily. Even small delays can have serious consequences for ambulance and fire service response times—yet National Grid offers no enforceable commitments to safeguard emergency access.

The assumption that construction traffic impacts will be “manageable” ignores:

- the entire construction period lasting multiple years
- overlapping NSIP traffic from other projects

- increased delays at pinch-points in villages
- cumulative severance of Public Rights of Way
- risks to pedestrians and cyclists, including around the B1121 and A256

The Applicant's claim that weekend or extended working hours have negligible impact is unrealistic; prolonged disruption cannot be brushed aside using average-day statistics.

The Examining Authority should require:

- a binding construction traffic management plan agreed with local authorities
- clear emergency services access protocols
- strict HGV routing, size limits, enforcement and penalties
- real-world road safety audits, not theoretical compliance checks

Without these, the project presents unacceptable risk to day-to-day mobility and public safety.

## **4. ENVIRONMENT AND ECOLOGICAL DAMAGE**

The Applicant's responses repeatedly downplay ecological impacts despite the presence of highly sensitive receptors, including the Sandlings SPA, Alde–Ore Estuary, Suffolk Coast & Heaths AONB, Pegwell Bay, marshland, ancient hedgerows and specialist coastal habitats.

The environmental assessments rely heavily on generic modelling and short survey windows that do not capture seasonal variation, migratory species or long-term ecosystem dynamics. Many of the affected habitats require multi-year survey baselines, particularly where species are sensitive to disturbance from noise, lighting, sediment movement or human presence.

**Key ecological concerns include:**

- Disturbance to birds, especially wintering and breeding populations in SPAs and SSSIs, where even minor, prolonged activity can cause displacement.
- Dust and deposition on rare plant communities, which are highly sensitive and cannot be restored through generic mitigation.
- Underwater noise and vessel activity in Pegwell Bay affecting seals and marine life at distances far greater than the Applicant acknowledges.
- Permanent habitat fragmentation from haul roads, compounds and cable routes, with some ecosystems unlikely to recover fully within decades.
- Floodplain and drainage alterations, increasing long-term flood and runoff risks to surrounding farmland and settlements.

National Grid's reliance on reinstatement and planting fails to recognise that mature habitats cannot simply be "replaced". Restoration plans are uncertain, unenforceable, and dependent on monitoring regimes the Applicant has not adequately defined.

Given the internationally and nationally designated nature of many affected landscapes, the Examining Authority must apply the precautionary principle and require independent ecological oversight, binding seasonal constraints and avoidance of sensitive areas—not merely mitigation after the fact.

## **5. IMPACT ON LOCAL ECONOMY, TOURISM AND WELLBEING**

The Applicant's assertion that tourism impacts will be negligible is not supported by local evidence or by the nature of the project. Tourism in Suffolk relies on tranquillity, landscape quality, coastal access and the character of rural villages—all of which will be significantly disrupted for years.

Businesses in hospitality, leisure, outdoor recreation and local retail depend on repeat visitation and seasonal peaks. Noise, visual intrusion, construction activity, road congestion and restricted access will directly affect visitor behaviour, particularly in summer months.

National Grid provides no guarantees that:

- local tourism jobs will be protected
- visitor numbers will not drop
- construction scheduling will avoid peak season
- temporary loss of amenity will be compensated
- local labour will be prioritised for jobs

Similarly, the Applicant does not recognise the profound wellbeing impacts on communities that will live for years amid noise, stress, fencing, compounds and uncertainty. Statements that no “significant” effects are predicted ignore cumulative psychological and social harms.

The economic benefits claimed are short-term and largely external, while local economic losses and loss of amenity may persist for decades. This imbalance is neither addressed nor compensated.

## CONCLUSION

National Grid’s responses consistently understate the scale, duration and seriousness of impacts arising from the Sea Link project. The Applicant relies on selective modelling, incomplete surveys, non-binding commitments and assumptions about mitigation that do not reflect the lived experience of local communities.

Until there is:

- a transparent and independent alternatives assessment
- binding mitigation, monitoring and enforcement
- genuine cumulative impact analysis

- full ecological precaution
- clear protection for emergency services and local road networks
- and meaningful recognition of harm to tourism, wellbeing and local economies

the project cannot be said to meet the standards required by national policy or community fairness.