

Andrew McDonald [REDACTED]

Project: SEA LINK EN020026

Deadline 2 Submission – Response to Applicant's Document 9.34.6 REP1-116, and its treatment of my Relevant Representation RR-0273

Dear ExA,

I am writing to respond to the Applicant's responses to Relevant Representations. In my case this is RR-0273 submitted on 19th June to meet the deadline of 23/06/25.

1 The Applicant has failed to respond adequately to individual Representations.

This is a very significant project for a number of local communities, and the Applicant praises itself very widely indeed in its public and corporate documents on its careful approach to engagement with local communities. Their response to those local communities at this critical stage has been completely inadequate. For my part, I shall just ask you to note that the classification of individual responses into 'thematic' groups has ignored 6 of the 7 points that I listed, so I must take it that my RR has not been responded to on these points.¹

2 The Applicant has failed to respond within the timetable and their final response is incoherent and extremely difficult to reference in the Examination Library.

I am not sure how many of their documents were accepted as late submissions but it must by now be over 100. I understand that you have specifically ruled out granting Interested Parties any further time to respond to these late submissions, but I would like it noted formally that even after the late submissions were accepted, further amendments were accepted up to December 1st; and even now some of the documentation that I have been reading and referring to in making this submission refers to missing appendices (REP1A-043 has no Appendix 2 or 3), lacks contents tables and hyperlinks (REP1-116) - and hurried and error-strewn updates have **still on 07/12/2025** not been noted in the Examination library, so that you may now for example be receiving comments on REP1-111 that should be being re-written as comment on REP1A-043. I have copied the current contents page of REP-116 into document (at Appendix A) to demonstrate how difficult the Applicant has made navigation and comprehension of their mostly generic responses.

3 It is unacceptably unfair that IPs should lose more than half of their time allotted for response as a result of the Applicant's administrative incompetence.

An IP responding to or studying the late submission of REP1-111 might (as I did) ask the case team for confirmation of a document's status on Friday 28th November and be sent *two* links to *two* new

¹ The Procedural decision was: '7. Responses to relevant representations. The ExA has made the procedural decision that when the applicant provides comments on the relevant representations they should: specify the names of the parties making the representation and the relevant examination library reference in order to demonstrate that all relevant representations have been responded to..' **This has not been done, as the Applicant notes in REP1A-043 at paragraph 11.1**

versions of that document on the afternoon of that day. A *third* version of the document (and each had to be checked for changes) was then posted in the examination library on Monday December 1st. There was no notice that it was an amended version of the earlier document. The current document is still not good enough; but even if it were, there would have been no more than 7 working days available for comment, on a document that was due to have been completed, checked and submitted by 18th November, to give IPs 15 working days to respond.

4 Response to the Applicant's 'rebuttals' on Traffic and transport

4.1 The applicant generally refers all IP comments back to the original and unchanged documents, and for example responds to concerns about Quiet Lanes as follows:

The Applicant acknowledges the concerns regarding quiet lanes and the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]. The Applicant considers sensitive receptors when drawing up the proposed construction access routes. For example, Grove Road (which is designated as a quiet lane) will only be used as a vehicle crossover between two proposed access points, to allow construction vehicles to continue along the haul road. Grove Road will not therefore be used by construction vehicles, other than when these are required to cross Grove Road (which will be managed).

As above, the impacts will be temporary during the construction phase and mitigation measures will be put in place to minimise any potential impacts; see Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk [AS-008].`

4.2 None of this dispels any concerns we may that **displacement and diversion** caused by the addition of Sea Link's construction vehicles to the already stressed local roads network has been or will in any way be subject to consideration or management, and therefore is of no comfort.

4.3 I note also that the Applicant's commitment within this response that '*Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk) will be submitted during the Examination at Deadline 1 to provide more detail about the methodology and findings of the cumulative assessment*', but of course this document was not submitted at that deadline but at a later date (as REP1-110), once more leaving us all less time to review its claims. Here are two of them:

- Sea Link cannot provide mitigation alone to reduce cumulative effects with other projects;
- Construction should not be compromised by re-programming or delaying works to avoid the peak construction phases of other projects;

And here is their introduction to a 'worked example':

C.1.2 It should be acknowledged that this is a worked example only and **does not directly relate to the Proposed Project or the cumulative assessment** that has been carried out

4.4 I think it is reasonable on these grounds to conclude that NGET have continued with their approach of desk studies and closed 'study areas' that entirely fail to take any account of the

impacts of the Proposed Project on the wider minor rural roads network; and that they clearly intend to ignore the outcome of any cumulative impact assessments in favour of their own works schedule. **They have put this in writing** and I can only urge the Examining Authority to reflect on whether this accords with their assumption elsewhere that local communities are due some consideration during the period of the works they propose. *We* feel that our amenity should not be compromised by a group of projects that clearly and blatantly propose to ignore the effects of other projects should they interfere with the progress of their construction. And I personally feel that they should be obliged to read their statement out in an Issue Specific Hearing and defend the position they are taking.

APPENDIX A Navigation issues:

REP1-116 Document 9.34.6 contains at the start:

Contents

1.

Thematic Responses to Relevant Representations of

1

No table of figures entries found.

No table of figures entries found.

Table 7.1 Applicant's Response to the Relevant Representations that raise Agriculture and Soil 2

Table 7.19 Applicant's Response to the Relevant Representations that raise Fish and Shellfish Ecology 121

No table of figures entries found.

No table of figures entries found.

No table of figures entries found.

These are the only clues as to the contents of this 185 page document. There is no easy way to discover that for example 'Traffic and Transport' issues that I referred to in my Relevant Representation are to be found at p42 Table 7.10 Applicant's Response to the Relevant Representations that raise Traffic and Transport. I am sure most IPs will have given up by this point, and I am pretty sure that this is part of the unacknowledged intention of the Applicant – and that this might perhaps have been noted by the ExA and corrections requested.