SUFFOLK ENERGY ACTION SOLUTIONS'

REBUTTAL TO NGET RESPONSE TO SEAS RELEVANT REPRESENTATION ON LANDSCAPE AND VISUAL

SEA LINK: EN020026 **SEAS IP:** [redacted]

DEADLINE: 2 – December 9, 2025 **Date: 9 Dec 2025**

This document constitutes SEAS rebuttal to the Applicant's Response to SEAS Relevant Representation [**RR-5210**], as set out in:

[REP1A-043] - 9.34.1 Applicant's Comments on Relevant Representations Identified by the ExA - Specifically Table 2.51 SEAS – Landscape and Visual

Procedural Introduction

1. The Applicant's formal comments on SEAS's Relevant Representation were due by Deadline 1 on 18 November 2025.

2. These comments were not submitted or published until 26 November 2025, eight days late. This delay deprived Interested Parties of the opportunity to review and respond in good time. SEAS and other community groups submitted their Relevant Representations in June 2025 and have consistently met every procedural deadline.

3. The compressed timetable created by the Applicant's delay places an unreasonable burden on Interested Parties and undermines the fairness and transparency of the examination process. SEAS wishes to place on record its strong disappointment with the Applicant's approach. Rather than engaging with the substantive concerns raised by SEAS, the Applicant has largely relied on restating its original Environmental Statement.

4. These shortcomings are compounded by recurrent administrative failings, including late submissions, missing appendices, and incorrect APP referencing. Such errors have resulted in procedural delay, reduced time for review, and significant additional work and cost for SEAS as a community group.

5. SEAS formally reserves its position in respect of costs arising from the Applicant's late and defective submissions. These repeated failings raise concerns regarding the Applicant's diligence and respect for the Examination process.

6. SEAS therefore considers it necessary to protect its procedural rights to ensure fairness in the examination process. A formal complaint and claim will be

submitted in relation to the avoidable delays and undue burden placed on stakeholders.

Executive Summary

7. SEAS, supported by Michelle Bolger's expert report and Nicholas Bridges Relevant Representation, submits that the Applicant's Landscape and Visual Impact Assessment (LVIA) and subsequent responses significantly understate the magnitude, extent, and permanence of harm arising from the Saxmundham Converter Station and the River Fromus access road and bridge.

8. The Applicant's assessment fails to comply with the NPPF (2024), NPS EN-1, NPS EN-5, and the East Suffolk Local Plan, Saxmundham Neighbourhood Plan, all of which require:

    a. Great weight to be given to the protection of landscape and scenic beauty.

    b. Rigorous design-led harm reduction.

    c. Accurate assessment of settlement setting.

    d. Avoidance of significant residual landscape harm where alternatives exist.

    e. Fully transparent cumulative assessment, including foreseeable co-located converter stations.

9. Independent expert review of landscape values and impacts following the GLVIA (3rd edition) confirms that the scale, massing and industrial character of the converter stations, up to 26 metres in height and occupying more than 50 acres, cannot be mitigated through planting, cladding, bunding, or design detailing. The location makes compliance with national planning, design and landscape policies impossible.

10. The River Fromus Valley will experience major adverse, irreversible, permanent harm, including severance of historic parkland, fragmentation of valley character, engineered intrusion on natural slopes, opening of harmful sightlines, and permanent erosion of Saxmundham's historic southern approach.

11. These landscape harms are compounded by cultural heritage impacts identified in SEAS's Cultural Heritage counter-response (Deadline 2), including enduring harm to Hurts Hall, the Church of St John the Baptist, Saxmundham Conservation Area, Buxlow Manor, Hill Farmhouse, Sternfield House, and the Church of St Mary Magdalene. Both landscape and heritage assessments demonstrate the same pattern of understatement and non-compliance.

12. SEAS therefore concludes that the Sea Link Landscape and Visual Assessment is fundamentally unreliable and cannot be relied upon by the Examining Authority. The only policy-compliant outcomes are refusal or substantial redesign and relocation of the converter station and access infrastructure.

Purpose and Scope

13. This submission provides SEAS's full counter-response to the Applicant's Detailed Responses to SEAS's Landscape and Visual Relevant Representation.

14. It integrates the findings of SEAS's original Landscape & Visual RR, Michelle Bolger Landscape Expert Review (2025), Nicholas Bridges Relevant Representation (RR 3944), SEAS's Cultural Heritage counter-response (Deadline 2).

15. It addresses the National Planning Policy Framework (Dec 2024), NPS EN-1 and NPS EN-5, the East Suffolk Local Plan, Saxmundham Neighbourhood Plan and the Applicant's detailed responses and methodological explanations.

16. This submission addresses fundamental deficiencies in the Applicant's evidence base, methodology, baseline, visualisations, policy compliance, cumulative assessment, and design approach.

17. **For clarity and transparency, SEAS has prepared a tabular appendix (Appendix A) setting out each theme, the Applicant's response, and SEAS's counter-response. This appendix should be read alongside the thematic narrative sections below.**

Thematic Counter-responses

Theme 1: Significant and Irreversible Harm to Landscape Character

18. Sensitivity of LCA L1 and LCA B4 is understated.

19. Methodological compression by relying on professional judgement narrative downgrades major adverse effects to moderate.

20. Permanent industrialisation of rural Suffolk cannot be mitigated.

Theme 2: Effects on the National Landscape (AONB) and its Setting

21. Failure to give great weight to designated landscapes and Area of Search so small it omits assessment of the River Alde estuary which its own ZTV plans show will be affected **(Sheets 4 and 6 - Peir Vol 3, Part 2, Chapter 4, Figures).**

22. Reliance on reinstatement ignores irreversible perceptual harm.

23. Tranquillity and wildness of the Suffolk Coast and Heaths AONB are eroded.

Theme 3: Severe Visual Harm from Key Receptors

24. Inconsistent susceptibility ratings undermine reliability.

25. Downgrading of major adverse effects masks severity.

26. Applicant's own documents concede dominant presence and canopy exceedance.

27. Assessment of Cultural Heritage and settings of designated assets accorded too little value and omitted entirely for places such as Iken and Slaughden.

Theme 4: Cumulative Impact with Other Major Infrastructure Projects

28. Foreseeable co-location of two/three converter stations ignored.

29. Fragmented cumulative assessment breaches EN-1 4.2.6 and EN-5 2.15.1.

30. Overlaps with Lionlink, Sizewell C, EA1N/EA2, and Friston substations not assessed.

Theme 5: Access Road and Bridge across the River Fromus

31. Permanent fragmentation of Hurts Hall parkland.

32. Engineered intrusion into undeveloped valley slopes.

33. Opening of harmful sightlines towards converter station(s).

34. Heritage evidence confirms the bridge introduces incongruous industrial elements into a tranquil valley, degrading the experiential setting of Hurts Hall, the Church of St John the Baptist, and Saxmundham Conservation Area.

Theme 6: Visualisations and Photomontages

35. Missing Year-1 summer and Year-15 winter views. We acknowledge the applicant has subsequently submitted these on request of the ExA since the Pre Examination Stage, we will provide our comments to them in Deadline 3.

36. Panoramic imaging understates scale and dominance.

37. Assessments of 3 viewpoints with massing coloured (Application Document 9.14 A Illustrative Visualisations Parts 1 & 2 November 2025) are still AVR0s

38. Character and scale of these very large windowless sheds and the attached wires and equipment still not modelled and imaged. Refer to 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 to 7 ALL which shows the inadequate quality of images upon which the LVIA's assessment of impacts and effects has been based.

39. Massing is "generic" using a "conventional agricultural baseline"

40. Still no commitment to a design as "four different design approach options are under consideration."

41. These with be reviewed "only when the Original Equipment Manufacturers; layouts (OEM) have been received." Surely this is standard equipment – it that shown on the application plans diagrammatic or specific? How can this fundamental part of the design be avoided by claiming the Rochdale Envelope?

42. Fromus Bridge: Approaches will need a shallow incline to avoid the 74m lorry train bottoming out at the junction with the bridge. The embankments are alien forms within rising across the falling valley. Planting alongside will accentuate the visual intrusion and harm to the character.

43. APP-364 admits diagrams are "not to scale."

44. Screening assumptions speculative and unreliable.

45. Cosmetic mitigation (cladding, colour gradients) ineffective in open rural settings.

46. Heritage evidence confirms reliance on summer-only photography misrepresents year-round experience of assets such as the Church of St John the Baptist.

Theme 7: Site Selection Transparency

47. Site not in Applicant's original shortlist.

48. No comparative matrix provided.

49. Alternatives such as RAF Leiston dismissed without transparent analysis.

50. This lack of transparent site selection breaches both EN-1 landscape requirements and EN-1 5.9 heritage duties, which require clear and convincing justification for harm to designated assets.

Conclusion

51. Taken together, these deficiencies reveal a consistent pattern: systematic understatement of harm, overstatement of mitigation, flawed methodology, and non-compliance with national and local policy.

52. The Saxmundham Converter Station and associated infrastructure will cause major adverse, permanent, and irreversible harm to rural landscape character, heritage settings, and designated landscapes.

53. SEAS's Cultural Heritage counter-response (Deadline 2) identifies parallel methodological flaws and enduring harm to designated assets including Hurts Hall, the Church of St John the Baptist, Saxmundham Conservation Area, Buxlow Manor, Hill Farmhouse, Sternfield House, and the Church of St Mary Magdalene. the Church of St Botolph, Iken and Martello Tower CC. These heritage harms are inseparable from the landscape and visual harms described in this document: both arise from the same permanent industrialisation of the Fromus Valley and Saxmundham's southern gateway and visible around the Alde Estuary within the AONB.

54. Together, the landscape and heritage evidence demonstrates that the Applicant's assessments are fundamentally unreliable and non-compliant with EN-1, EN-5, the NPPF, and the East Suffolk Local Plan and Saxmundham Neighbourhood Plan.

55. SEAS therefore concludes that National Grid's LVIA and Cultural Heritage Appendix A cannot be relied upon by the Examining Authority. The only policy-compliant outcomes are refusal of consent or substantial redesign and relocation of the converter station and access infrastructure.

SEAS Appendix A: Landscape and Visual

Theme: Significant and Irreversible Harm to Landscape Character.

SEAS Summary of Relevant Representation	Applicant's summary response	SEAS Counter response
1.1 LCA L1 (Heveningham and Knodishall Estate Claylands) is undervalued in the ES. It is a visually unspoilt rural setting forming the eastern gateway to Saxmundham.	*Value, susceptibility, and sensitivity assessed per GLVIA3 and LI Technical Guidance Note 02/21. Judged as medium, reflecting arable farmland and woodland blocks with scenic quality and tranquillity.*	GLVIA3 requires local distinctiveness and community perception to be considered. LCA L1 is more than farmland, it is the rural gateway to Saxmundham. Independent expert review (MBELC 2025, para. 6.2) concludes sensitivity is **medium-high**, not medium. Underestimation skews significance ratings.
1.2 ES assigns medium value/susceptibility, leading to lower significance. MBELC 2025 finds this underestimated.	*ES states Moderate Adverse effects at Year 1 and Year 15, acknowledging adverse impact but limited by vegetation screening.*	"Moderate Adverse" masks severity. Converter station is a **permanent industrial intrusion** — mitigation planting cannot screen bulk/height in flat terrain. Omission of site from original alternatives appraisal undermines credibility of "moderate" rating.
1.3 ES assumes mitigation reduces effects from major to moderate adverse by Year 15, ignoring scale and cumulative impact of multiple stations.	*Cumulative assessment (APP-060) identifies potential for significant effects at all project stages.*	Acknowledging cumulative effects is insufficient if baseline sensitivity is underestimated. Correct sensitivity (medium-high) escalates cumulative impacts to **major adverse significance**. Multiple converter stations would irreversibly transform Saxmundham's southern approach.

1.4 LVIA's three-tier scale compresses outcomes, understating major adverse effects	LVIA applies a four-tier scale consistent with GLVIA3 and LI guidance.	Applicant's methodology compresses outcomes, collapsing **major irreversible harm** into "moderate." GLVIA3 does not prescribe rigid scales — transparency is required. MBELC 2025 (Table 1, p.8) shows systematic understatement. This undermines trust and fails transparency tests for NSIPs.

Theme: Landscape and Visual Effects on the National Landscape (AONB) and its Setting.

2.1 The ES underplays impacts on the setting of the National Landscape (AONB), including trenchless landfall construction, haul roads, and temporary compounds. These are assessed under generic receptors (e.g. LCA B1) and dismissed as minor or not significant	*Baseline and assessment of AONB effects are contained in APP-096 and APP-097. Works within and near the AONB are temporary, with reinstatement planned. Converter Station is sited away from the AONB. Effects are assessed as Minor adverse, not significant.*	Treating the AONB as a generic receptor (LCA B1) fails to recognise its **statutory designation and special qualities**. EN-1 (2024, para. 5.9.12) requires great weight to be given to designated landscapes and their settings. Temporary compounds, haul roads, and trenchless works still erode tranquillity, wildness, and perceptual qualities central to the AONB's designation. Dismissing these as "minor" underplays the real perceptual harm.
2.2 The National Landscape designation is not explicitly recognised in APP-048, and its special qualities are not assessed as part of the visual baseline. This undermines compliance with EN-1 (2024).	*AONB name retained for legal consistency. APP-097 assesses effects against Natural Beauty Indicators. Appendix F of APP-319/AS-057 provides additional assessment. Temporary activity displaces small*	The applicant's reliance on reinstatement ignores **irreversible perceptual impacts** during construction: loss of tranquillity, disruption of wildness, and industrialisation of the coastal setting. EN-1

	areas of acid grassland and boundary vegetation, but reinstatement will restore conditions. Magnitude of effect is small, resulting in Minor adverse.	requires weight to be given not only to permanent infrastructure but also to **temporary harm to designated landscapes and their settings**. The ES fails to explicitly assess the AONB's special qualities (scenic quality, relative wildness, cultural associations) as part of the visual baseline. This omission undermines compliance with national policy.
Overall Theme *Significant and irreversible harm to the setting of the National Landscape is understated.*	*Applicant concludes effects are Minor adverse and not significant, with residual effects negligible after reinstatement.*	The applicant's framing of "minor" ignores the **statutory purpose of the AONB:** conserving and enhancing natural beauty. Even temporary compounds and haul roads erode tranquillity and wildness, which cannot be "reinstated." The ES fails to give great weight to the designation as required by EN-1. The harm is **greater than minor** and should be recognised as significant

Theme: Severe Visual Harm from Key Receptors

3.1 ES identifies significant harm from key viewpoints (VP1, VP4, VP7, VP11). Inconsistencies in susceptibility ratings (e.g., VP2 "medium" vs VP20 "very high") undermine reliability.	*Susceptibility ratings explained in APP-098. VP20 represents long-distance recreational trail users (higher susceptibility). VP2 reflects busy B1121 foreground, reducing susceptibility.*	In assessing VP2 as just a busy road, the applicant denies its role as an approach to Saxmundham. Busy roads do not negate sensitivity to large-scale industrial intrusion. VP2 still represents receptors experiencing clear visibility of the converter station within the best approach to Saxmundham in an important setting of its

		CA.. The disparity between VP2 and VP20 ratings undermines confidence in the LVIA's consistency.
3.2 VP4 shows very high sensitivity and large magnitude of change yet classified only as moderate adverse — evidence of methodological compression.	*At construction and Year 1, VP4 is judged major adverse. At Year 15, mitigation planting reduces magnitude to large, effect downgraded to moderate adverse.*	Mitigation assumptions are speculative. Planting cannot screen bulk/height of converter station in elevated/open surroundings. Downgrading from major to moderate adverse is **methodological compression** that masks long-term severity.
3.3 APP-364 acknowledges converter station risks "creating a dominant presence" (VP4) and tallest structures rising above canopy (VP15).	*APP-364 is a Design Approach Document, not LVIA. VP2 is a key viewpoint with design principles applied. APP-098 assesses effects including River Fromus bridge.*	Whether LVIA or design document, applicant's own evidence concedes **dominant presence** and canopy exceedance. These admissions confirm severe visual harm. Attempting to separate APP-364 from LVIA does not negate the reality of acknowledged dominance.
3.4 VP2 is presented as key, yet converter station will be visible through a break in screening. No mention of visibility of proposed land bridge.	*APP-098 assesses VP2 and includes River Fromus bridge.*	The ES omits visibility of the proposed land bridge, a critical omission. Breaks in screening mean VP2 will experience **direct, unmitigated views** of infrastructure. This undermines claims of limited impact.
3.5 MBELC Appendix 3 shows inconsistent judgments across receptors. Minor detractors are overemphasised while	*MBELC selectively applies assessments. Full LVIA summary in APP-048 Tables 1.10–1.12. GLVIA3 emphasises*	"Professional judgement" cannot excuse **systematic understatement**. MBELC demonstrates clear inconsistencies: minor

large-scale change is underassessed.	*professional judgement over formulaic matrices.*	detractors inflated, major changes downplayed. This pattern erodes trust in the LVIA's reliability and transparency.

Theme: Cumulative Impact with Other Major Infrastructure Projects

4.1 ES does not fully assess cumulative impact of co-locating up to three converter stations. Only LionLink is considered, and only in the cumulative chapter.	*Cumulative effects of Suffolk Onshore Scheme and LionLink are assessed in APP-060. Other projects (e.g., Nautilus) excluded for reasons in paras. 13.2.7–13.2.9.*	Limiting cumulative assessment to LionLink is inadequate. **The realistic worst-case scenario** includes Sea Link, LionLink, a third converter station and the Helios Solar Park. Excluding Nautilus and others fragments the assessment and fails to capture the **true cumulative burden** on landscape character. APP-363 shows the potential of having 3 converter stations on the site.
4.2 MBELC 2025 confirms combined presence of multiple converter stations would intensify harm and should be assessed within the core LVIA.	*Cumulative assessment is presented separately, consistent with other specialist chapters.*	Separating cumulative impacts into a standalone chapter marginalises their importance. GLVIA3 requires cumulative effects to be integrated into the **core LVIA narrative**, not siloed. MBELC rightly identifies that co-location of multiple stations escalates harm to **major adverse significance**, which the applicant's approach obscures.
4.3 ZTV and visual overlap with Sizewell C, EA1N/EA2 and Friston substations are acknowledged but not	*Cumulative ZTVs informed the cumulative visual assessment and sequential cumulative visual assessment.*	ZTV mapping alone is insufficient. A **meaningful cumulative landscape character assessment** requires narrative

translated into meaningful cumulative landscape character assessment.		analysis of how overlapping infrastructure alters perception, identity, and sense of place. The ES fails to translate ZTV data into substantive conclusions, leaving cumulative harm underreported.

Theme: Access Road and Bridge across the River Fromus

5.1 ES assesses the 6m high River Fromus bridge as moderate adverse at Year 1 and minor (not significant) by Year 15.	*ES acknowledges significant adverse effect at Year 1, but claims native woodland planting and hedgerow/tree planting will screen and integrate the bridge by Year 15, reducing residual effects to minor.*	The bridge is **permanent infrastructure** in a sensitive valley landscape. The form and positions of the bridge embankment are antithetical to the landscape qualities of the Fromus valley. Planting cannot erase its physical presence or restore the openness of valley slopes. Downgrading to "minor" ignores the enduring disruption to landscape character and heritage setting.
5.2 MBELC 2025 states this is permanent, unmitigable harm to Hurts Hall and Fromus Valley. It fragments historic parkland, introduces development onto open slopes, and opens views of the converter station from the B1121.	*Cultural Heritage assessment (APP-050) concludes Minor Adverse (not significant) effects on Hurts Hall and its parkland. ES claims bridge does not influence visibility of converter station from B1121, which appears beyond ridgeline.*	MBELC evidence shows **fragmentation of historic parkland** and valley slopes is irreversible. Even if the bridge does not directly obscure converter station views, it **opens up new sightlines** and industrialises the valley setting. Heritage harm is understated: Hurts Hall's designed landscape is permanently altered.
5.3 Mitigation assumptions (planting,	*Photomontages (APP-209) show mitigation*	Photomontages are **optimistic**

bunding) are overestimated and do not reduce prominence or disruption even by Year 15.	*planting agreed with SCC/ESC, using conservative growth rates. Applicant claims these accurately reflect screening potential.*	**representations** that cannot replicate lived experience of scale and permanence. Planting may soften edges but cannot conceal a 6m bridge or access road cutting across valley slopes. Character disruption remains visible and perceptual harm persists.

Theme: Visualisations and Photomontages

6.1 Photomontage set omits Year 1 summer and Year 15 winter views, which are essential to evaluate seasonal and long-term worst-case scenarios.	*Applicant states visualisations follow industry guidance (APP-095) and are contained in APP-208–214. APP-364 is a design document, not LVIA.*	Omission of Year 1 summer and Year 15 winter views is a **fundamental flaw**. GLVIA3 and APP-095 (para. 2.5.3) require seasonal variation to test mitigation effectiveness. Without these views, inspectors cannot judge worst-case visibility when screening is least effective (summer leaf gaps, winter bare canopies).
6.2 MBELC 2025 identifies omission as preventing proper judgement of mitigation effectiveness and recommends NG be required to submit missing photomontages.	*Applicant claims accurate visualisations have been undertaken in line with guidance and presented in APP-208–214.*	MBELC evidence is clear: without seasonal/worst-case photomontages, mitigation claims are **unverifiable**. Applicant's reliance on "industry guidance" is misleading — guidance requires comprehensive seasonal testing. The absence of these views undermines transparency and prevents a robust assessment of long-term harm.

6.3 APP-364 admits that cross-sections and key visualisation elements (e.g., Figure 2.2, Visual Amenity Viewpoint Location Map) are "not to scale." This is disingenuous given the importance of scale and visibility in determining harm.	*Applicant argues APP-364 is a Design Approach Document, not the LVIA. Accurate visualisations are contained in APP-208–214, prepared in line with industry guidance (APP-095).*	Whether APP-364 is a design document or not, admitting that key visualisation elements are "not to scale" undermines confidence in the **accuracy and transparency** of the assessment. Scale is fundamental to judging visibility, dominance, and harm. Presenting non-scaled diagrams risks misleading stakeholders and inspectors. The applicant's reliance on APP-208–214 does not excuse the fact that **critical design documents used to communicate impacts omit scale fidelity**, weakening trust in the overall visual evidence base.
6.4 The use of panoramic images underrepresents the visual dominance of infrastructure in an open, low-hedged agricultural landscape. Single-frame photomontages should be provided to reflect human perception, as panoramic views distort scale.	*Applicant states cylindrical panoramic images are consistent with Landscape Institute Technical Guidance Note 06/19 (2019).*	Compliance with guidance does not guarantee accuracy of **human perception.** Panoramic images artificially widen the field of view, diminishing apparent scale and dominance. In open, low-hedged landscapes, this distortion is particularly misleading, as infrastructure appears smaller and less intrusive than in reality. GLVIA3 emphasises the need for visualisations to be **honest and representative**. Single-frame photomontages are essential to show how infrastructure will actually be experienced by receptors. The omission

		of single-frame views systematically understates harm.
6.5 Cladding or colour gradients as visual mitigation are ineffective in open, low-vegetation landscapes. They can draw more attention to building mass. APP-364 fails to justify this approach in a rural B-road context.	*APP-364 provides design approaches aligned with Site-Specific Design Principles (APP-366). Post-consent design team will have a toolkit to adapt architectural design to engineering solutions. Illustrations in APP-364 are not prescriptive.*	Reliance on cladding or colour gradients is **cosmetic mitigation** that does not address scale, bulk, or dominance. In open agricultural landscapes with low vegetation, such treatments often **accentuate rather than conceal large structures**, making them more visually conspicuous. APP-364 offers no evidence that such measures are effective in rural B-road contexts where receptors experience close-range views. Deferring design choices to a "toolkit" post-consent undermines transparency and prevents meaningful scrutiny of visual harm at examination stage.
6.6 Claims that screening will mitigate visual harm are speculative. Existing field margins and hedgerows are not guaranteed permanent features and are vulnerable to seasonal loss and climate impacts.	*LVIA acknowledges mitigation planting will not fully screen the Converter Station. Year 15 photomontages use realistic planting heights. Existing boundary vegetation and woodland copses provide layering that assists partial screening. Assessing effects without vegetation (bare earth) would be disproportionate and unrealistic.*	Applicant concedes mitigation planting cannot fully screen the Converter Station, confirming SEAS's point. Reliance on existing vegetation is **inherently speculative**: hedgerows and copses are not permanent, subject to seasonal change, disease, and climate vulnerability. EIA must consider **worst-case scenarios**, not assume continuity of vegetation. The "layering effect" is overstated and cannot disguise the scale and industrial character of

		the Converter Station. Screening assumptions therefore underplay long-term harm.

Theme: Conclusions

SEAS submits that the landscape and visual effects of the Sea Link project, particularly from the Saxmundham Converter Station and its access infrastructure, are severely underestimated. Evidence shows:• Fundamental and permanent harm to sensitive rural landscapes • Inadequate cumulative impact assessment • Deficient mitigation and flawed methodological judgements • Significant harm to Saxmundham and the National Landscape • Misleading and insufficient visualisations (APP-364) • Non-compliance with NPS EN-1, EN-5, and CRoW Act duties. Therefore, development consent mustbe refused.	*Applicant accepts adverse effect on rural character of LCA but argues flat landform and vegetation limit widespread effects. Applicant claims AONB effects are minor adverse, temporary, and not significant. Applicant refutes claims of flawed methodology, deficient mitigation, or misleading visualisations. Applicant asserts full compliance with EN-1 and s85 CRoW Act duty.*	Applicant's concessions confirm **adverse effects** but minimise their significance. Flat landform and vegetation do not erase the **dominant presence** of permanent industrial infrastructure. AONB harm cannot be dismissed as "minor" when tranquillity, wildness, and perceptual qualities are disrupted. Cumulative assessment remains fragmented and incomplete, failing to capture the **realistic worst-case scenario** of multiple converter stations. Mitigation is overstated, visualisations are incomplete and misleading, and methodological compression masks severity. Non-compliance with EN-1, EN-5, and CRoW Act duties is evident: great weight has not been given to designated landscapes, nor has the statutory purpose of conserving natural beauty been upheld. The evidence demonstrates **fundamental, permanent, and irreversible harm**, warranting refusal of consent.