

SAND (Saxmundham Against Needless Destruction) submits our counter response to the Applicant's Response to the Relevant Representation of SAND, as set out in Sea Link Volume 9: Examination Submissions, Document 9.34.5: Applicant's Response to Selected Relevant Representation Responses. (REP1-115)

The submission provides a structured rebuttal to the Applicant's claims, addressing each theme in turn, including site selection, consultation, noise, air quality, water management, ecology, biodiversity, cumulative impacts, and community wellbeing. The document highlights the inadequacy of the Applicant's evidence, the unreliability of its Environmental Statement and Habitats Regulations Assessment, and the lack of enforceable mitigation measures.



SAXMUNDHAM AGAINST NEEDLESS DESTRUCTION (SAND)

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SAXMUNDHAM AGAINST NEEDLESS DESTRUCTION





Summary

This document constitutes the formal response of SAND (Saxmundham Against Needless Destruction) to the Applicant's Response to the Relevant Representation of SAND, as set out in *Sea Link Volume 9: Examination Submissions, Document 9.34.5: Applicant's Response to Selected Relevant Representation Responses. (REP1-115)*

It provides a structured rebuttal to the Applicant's claims, addressing each theme in turn, including site selection, consultation, noise, air quality, water management, ecology, biodiversity, cumulative impacts, and community wellbeing. The document highlights the inadequacy of the Applicant's evidence, the unreliability of its Environmental Statement and Habitats Regulations Assessment, and the lack of enforceable mitigation measures.

REF 6.7.2 Introduction

SAND RR Statement

2.1 SAND was formed to provide information, raise awareness, and represent community interests regarding energy infrastructure proposals affecting East Suffolk. We object to the Sea Link DCO application in its current form.

2.2 National Grid's targeted consultations (July and November 2024) have overlooked widespread stakeholder engagement. Key concerns raised by residents have not been addressed, and consultation materials have been limited in scope.

2.3 This Relevant Representation sets out our objections across the following themes: visual and landscape impact; site selection and community engagement; noise, air quality, and water management; traffic and transport; ecology and biodiversity and cumulative impacts.

Applicant's Response

The SEA Link DCO Application has been through an extensive pre-application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the Application Document 5.1 Consultation Report [APP-301] which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation have fed into the design of the Proposed Project.

The Applicant notes that the Application has already been through an extensive consultation process that has been found to be consistent with the requirements of the Planning Act 2008 (including the duty to consult the local community under Section 47) as part of the Section 55 Acceptance process for the Application [PD-001].

Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination.

SAND Counter Response

1. Failure to Engage with Substantive Concerns

The Applicant's response relies on procedural compliance rather than addressing the substance of SAND's concerns. Listing consultation dates and statutory requirements does not demonstrate that meaningful engagement took place. SAND's point is that consultation was narrow, targeted, and failed to address widespread community concerns. The Applicant's reply does not rebut this.

2. Limited Scope and Accessibility of Consultation

While the Applicant cites multiple rounds of consultation, these were limited in scope and poorly accessible to affected communities. Materials were technical, incomplete, and failed to explain cumulative impacts or alternatives. Many residents felt excluded or unable to participate



meaningfully. Simply meeting the minimum statutory requirements under the Planning Act 2008 does not equate to effective engagement.

3. Ignoring Key Community Concerns

SAND's evidence shows that issues raised by residents, including siting, traffic safety, biodiversity, and cumulative impacts, were not addressed in the Applicant's Environmental Statement or subsequent revisions. The Applicant's response does not demonstrate how these concerns were incorporated into project design. Instead, it repeats that "responses fed into the design," without providing examples or evidence of substantive changes.

4. Procedural vs. Genuine Engagement

The Applicant's reliance on Section 55 acceptance is misplaced. Acceptance confirms procedural adequacy, not the quality or effectiveness of consultation. SAND's objection is that consultation was perfunctory, reactive, and failed to build trust or transparency. This undermines the fairness of the process and the credibility of the Applicant's claim to have engaged meaningfully.

REF 6.7.3 Landscape and Visual Impact

SAND RR Statement

3.1 The converter station's scale (up to 26m) and the six-metre high, 150m-long bridge will dominate the rural skyline, conflicting with the heritage setting of nearby Grade II and Grade II listed assets.*

Applicant's Response

The Applicant refers to its Environmental Statement and appendices, noting that the upper extents of the converter station would be visible in some locations but claiming that woodland and layered vegetation would provide screening such that prominence on the skyline is limited. The Applicant further asserts that the River Fromus bridge would not affect the rural skyline as it would be contained within the valley. The Applicant's heritage assessment concludes that while change to the settings of Hurts Hall and the Church of St John the Baptist is acknowledged, this is not due to skyline dominance.

SAND Counter Response

5. Failure to Address Scale and Dominance

The Applicant's response downplays the scale of the converter station (up to 26m high) and the six-metre bridge. Even with woodland backdrops, structures of this magnitude inevitably dominate a rural skyline characterised by low-lying agricultural land and modest built form. The Applicant's reliance on "layered vegetation" ignores seasonal variation and the fact that winter months expose the full bulk of the station and bridge.

6. Misrepresentation of Skyline Effects

The Applicant claims the converter station does not break the treeline or exceed the height of Hurts Hall. This is misleading. The treeline is not continuous, and gaps in vegetation reveal the industrial massing. Hurts Hall and the Church of St John the Baptist are heritage assets designed to be experienced within a tranquil rural setting. The juxtaposition of a 26m industrial structure alongside these assets fundamentally alters their skyline context, regardless of whether the station marginally exceeds tree height.

7. River Fromus Bridge Impacts

The Applicant asserts the bridge will not affect the skyline because it is "contained within the valley." This ignores the experiential reality: the bridge introduces a six-metre engineered structure into a previously undeveloped valley floor, visible in foreground views from the B1121 and The Layers. Its intrusion is not limited to skyline dominance but includes fragmentation of historic parkland, severance of ecological corridors, and degradation of the valley's character.

8. Heritage Setting Conflicts

The Applicant acknowledges change to the settings of Hurts Hall and the Church of St John the



Baptist but attempts to minimise this by reframing the issue as “not related to skyline dominance.” This is a narrow interpretation of setting. Historic England guidance (GPA3) makes clear that setting includes the way assets are experienced, not just skyline views. The industrialisation of the Fromus Valley and Saxmundham’s southern gateway constitutes moderate to major adverse harm to heritage settings, regardless of whether the structures “break the treeline.”

REF 6.7.4 Landscape and Visual Mitigation

SAND RR Statement

3.2 Proposed screening planting will take decades to mature and cannot mitigate the prolonged visual intrusion.

3.3 We urge the Examining Authority to require alternative designs: partial excavation of the station, reduced height and massing, sympathetic cladding and green roofs, and early, substantial native planting.

Applicant’s Response

The Applicant refers to its outline Landscape and Ecology Management Plan (oLEMP) [AS-059], stating that planting maturity has been taken into account in the assessment of effects. It notes that opportunities for advanced planting will be considered to provide early establishment. The Applicant also cites its Design Principles [APP-366], which include locating the smallest feasible compound massing to the south, exploring green roofs, and applying design principles on building form, materiality, colour, and texture. These principles are secured through the draft DCO. The Applicant further states that design parameters are based on operational requirements and that alternative design options were consulted on in 2023, with feedback informing the Design Principles.

SAND Counter Response

9. Screening Planting Cannot Mitigate Scale and Permanence

The Applicant’s reliance on planting as mitigation is fundamentally flawed. Even “advanced planting” requires decades to reach maturity, during which time residents and heritage assets will be exposed to prolonged visual intrusion. Seasonal variation further undermines effectiveness: deciduous planting provides little screening in winter months, leaving the converter station’s bulk fully visible. The Examining Authority should recognise that planting cannot disguise a 26m industrial structure in an open rural landscape.

10. Cosmetic Design Principles Do Not Address Core Harm

The Applicant cites design principles such as sympathetic cladding, colour gradients, and potential green roofs. These are cosmetic measures that do not reduce the fundamental height, massing, or industrial character of the converter station. Locating the “smallest feasible compound” to the south does not alter the fact that the station remains oversized and inappropriately sited. The Applicant’s response avoids the substantive design alternatives proposed by SAND, partial excavation, reduced height and massing, and substantial early native planting, which would materially reduce harm.

11. Operational Requirements vs. Policy Compliance

The Applicant asserts that design parameters are dictated by operational requirements. This is not a sufficient justification under NPS EN-1 5.9, which requires clear and convincing evidence that harm to landscape and heritage assets is unavoidable. The Applicant has not demonstrated why operational needs prevent excavation, reduced massing, or relocation to a less sensitive site. Policy requires avoidance of harm, not acceptance of harm mitigated by cosmetic measures.

12. Consultation on Alternatives Was Inadequate

The Applicant claims that alternative design options were consulted on in 2023. However, community feedback shows that these consultations were narrow, technical, and did not meaningfully explore excavation, reduced height, or relocation. Recording “a high volume of responses” does not equate to genuine incorporation of community concerns. The Applicant’s reliance on its Consultation Report [APP-301] is procedural, not substantive.



REF 6.7.5 Site Selection

SAND RR Statement

4.1 The proposed converter station is sited on prime arable farmland directly adjacent to a residential market town and villages. Alternative brownfield sites closer to demand centres have not been adequately evaluated.

Applicant's Response

The Applicant states that a variety of potential areas for new infrastructure were assessed, including brownfield sites. It claims that brownfield sites within the areas of search were considered too small to accommodate the required infrastructure, citing Bradwell and Sizewell as examples. The Applicant refers to Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] for further detail.

SAND Counter Response

13. Failure to Justify Use of Prime Farmland

The Applicant has not provided clear and convincing justification for siting the converter station on productive arable farmland adjacent to Saxmundham and nearby villages. National policy (EN-1 5.11.12, requires avoidance of unnecessary loss of high-quality agricultural land and protection of rural landscapes. The Applicant's response does not explain why farmland was prioritised over less sensitive brownfield alternatives.

14. Inadequate Evaluation of Brownfield Sites

The Applicant dismisses brownfield sites such as Bradwell and Sizewell as "too small" without presenting transparent comparative analysis. No evidence is provided of detailed capacity studies, design adaptations, or consideration of partial excavation or reduced massing to fit brownfield footprints. Simply asserting insufficiency is not a robust evaluation. The Examining Authority should require disclosure of the full site selection matrix and comparative scoring to demonstrate compliance with EN-1 and the Horlock Rules.

15. Proximity to Residential and Heritage Assets

The Applicant's response fails to address the fundamental issue: the Saxmundham site is directly adjacent to a residential market town and sensitive heritage assets. Locating industrial infrastructure of this scale in such proximity is contrary to EN-1 5.9.27, which requires great weight to be given to the conservation of heritage assets and their settings. The Applicant's reliance on farmland availability ignores the cumulative harm to community amenity, landscape character, and heritage significance.

16. Lack of Transparent Alternatives Process

The Applicant refers to APP-044 but does not demonstrate that alternatives were transparently presented to communities or meaningfully consulted upon. SAND's evidence shows that residents were not given clear information about brownfield options or the criteria used to dismiss them. This undermines the credibility of the Applicant's claim that alternatives were properly considered.

REF 6.7.6 Site Selection and Community Engagement

SAND RR Statement

4.2 Consultation has been limited to statutory consultees and targeted letters; broad community groups beyond those narrow cohorts have been excluded.

Applicant's Response

The Applicant reiterates its assessment of alternative sites, dismissing brownfield options such as Bradwell and Sizewell as too small. It claims that the project has been through an extensive pre-application consultation process involving statutory consultees, landowners, members of the public, and other interested parties. The Applicant cites its Consultation Report [APP-301], noting



non-statutory consultation (Oct–Dec 2022), statutory consultation (Oct–Dec 2023), and two targeted consultations. It asserts that responses fed into project design and that engagement was proportionate, agreed with local planning authorities, and consistent with the Statement of Community Consultation.

SAND Counter Response

17. Narrow and Exclusionary Consultation

The Applicant's response conflates statutory compliance with genuine engagement. While statutory consultees and landowners were contacted, broad community groups, including residents' associations, campaign groups, and local organisations, were excluded or only informed via targeted letters. This falls short of the Planning Act 2008's intent under Section 47, which requires meaningful consultation with the wider community, not just statutory bodies.

18. Procedural Compliance vs. Effective Engagement

The Applicant relies heavily on its Consultation Report [APP-301] to demonstrate compliance. However, procedural adequacy does not equate to effective engagement. SAND's evidence shows that consultation materials were limited in scope, highly technical, and failed to explain cumulative impacts or alternatives. Many residents were unaware of consultations or unable to participate meaningfully.

19. Lack of Transparency in Site Selection

The Applicant repeats its dismissal of brownfield sites without providing transparent comparative analysis. Communities were not shown the full site selection matrix or criteria used to reject alternatives. This undermines trust and prevents informed community input. Consultation that excludes such critical information cannot be considered proportionate or effective.

20. Agreement with Local Authorities Is Not Sufficient

The Applicant notes that the scope of engagement was agreed with local planning authorities. This does not absolve the Applicant of its duty to consult widely. Local authority agreement on scope does not replace the requirement to engage directly with affected communities, nor does it demonstrate that consultation was inclusive or transparent.

REF 6.7.7 Noise, Air Quality and Water Management

SAND RR Statement

5.1 Extended working hours, plant noise, reversing alarms, and dust will harm residential amenity and public health.

Applicant's Response

The Applicant acknowledges potential for noise, air quality, visual, and traffic effects but claims that amenity impacts have been assessed in Chapter 11 Health and Wellbeing [APP-058], with no significant adverse effects identified. It states that embedded mitigation measures (noise, vibration, air quality, transport, socio-economics) will reduce impacts. The Applicant refers to its Code of Construction Practice [APP-341] and Register of Environmental Actions and Commitments [APP-342] as measures to avoid adverse health impacts, including mental health disruption. It also cites its Coordination Document [APP-363] as evidence of efforts to reduce cumulative impacts with other projects.

SAND Counter Response

21. Understatement of Residential Amenity Harm

The Applicant's conclusion of "no significant adverse effects" is not credible. Extended working hours, heavy plant operation, reversing alarms, and dust emissions are daily realities for residents living adjacent to the site. These impacts are intrusive, prolonged, and cumulative, particularly in a quiet rural town where baseline noise levels are low. The Applicant's assessment fails to reflect the lived experience of residents and underestimates the severity of disruption.



22. Noise and Health Impacts Minimised

The Applicant acknowledges potential mental health impacts but claims mitigation will “reduce or avoid” them. This is speculative. Noise from reversing alarms, heavy machinery, and construction traffic is unavoidable and will cause stress, sleep disturbance, and reduced quality of life. Public health literature confirms that prolonged exposure to construction noise and dust contributes to respiratory illness, cardiovascular risk, and mental health decline. The Applicant’s reliance on embedded mitigation does not eliminate these risks.

23. Dust and Air Quality Risks

Dust emissions from excavation, haul roads, and construction traffic will directly affect nearby homes, schools, and community facilities. The Applicant’s response does not provide detail on monitoring, enforcement, or thresholds for intervention. Without robust controls, residents will face prolonged exposure to particulate matter, undermining public health.

24. Inadequate Mitigation and Enforcement

The Applicant cites its Code of Construction Practice and REAC, but these are generic commitments with limited enforceability. They do not guarantee reduced working hours, noise suppression beyond standard alarms, or dust control sufficient to protect health. The Examining Authority should require binding conditions on working hours, noise limits, dust suppression, and independent monitoring.

25. Coordination with Other Projects Is Insufficient

The Applicant refers to its Coordination Document [APP-363], but this does not address the cumulative reality of overlapping construction schedules in East Suffolk. Residents already face disruption from multiple energy projects. Coordination in principle does not mitigate the compounded noise, traffic, and dust impacts in practice.

REF 6.7.8 Traffic Emissions – NO₂ and Particulates

SAND RR Statement

5.2 Increased HGV traffic will elevate local NO₂ and particulate levels, particularly at junctions and in confined streets.

Applicant’s Response

The Applicant states that air quality impacts have been assessed in Chapter 8 Air Quality [APP-055] using best practice guidance, with methodology agreed with Suffolk County Council and East Suffolk Council. It claims traffic flows are below IAQM/EPUK screening criteria except on the A12 (Air Quality Management Area now revoked). Detailed modelling at worst-case receptor locations along the A12 predicted negligible changes in NO₂, PM10, and PM2.5. The Applicant concludes construction, operation, and decommissioning vehicle emissions are negligible and not significant.

SAND Counter Response

26. Localised Impacts Ignored

The Applicant’s modelling focuses on the A12 corridor but fails to assess confined streets and junctions within Saxmundham and surrounding villages where HGV traffic will concentrate. Narrow roads, residential frontages, schools, and pedestrian areas are highly sensitive receptors. Even modest increases in HGV flows can elevate localised NO₂ and particulate levels in these micro-environments, which are not captured by broad screening criteria.

27. Reliance on Screening Criteria Masks Real-World Effects

The Applicant relies on IAQM/EPUK screening thresholds to dismiss impacts as negligible. These thresholds are designed for generalised assessment, not for rural towns with constrained junctions and sensitive receptors. Residents experience pollution at street level, not averaged across wide corridors. The Applicant’s methodology therefore underestimates harm.



28. Revocation of AQMAs Does Not Remove Risk

The Applicant notes that the A12 Air Quality Management Area has been revoked. This is irrelevant to Saxmundham's situation. Revocation reflects past compliance, not immunity from future exceedances. Introducing sustained HGV traffic through Saxmundham risks re-creating localised exceedances, particularly in confined streets where dispersion is poor.

29. Cumulative and Temporal Effects Overlooked

The Applicant's modelling does not account for cumulative impacts from overlapping energy projects or peak construction traffic. Nor does it adequately consider temporal spikes, such as convoy movements or concentrated deliveries, which can cause short-term exceedances harmful to health. These omissions undermine the credibility of the "negligible" conclusion.

30. Public Health Risks Understated

Particulate matter (PM10 and PM2.5) is linked to respiratory illness, cardiovascular disease, and childhood asthma. Even small increases in concentrations at sensitive receptors are significant for public health. The Applicant's dismissal of impacts as "not significant" ignores the precautionary principle and the duty under NPS EN-1 5.2 to protect human health.

REF 6.7.9 Water Management and Flood Risk

SAND RR Statement

5.3 Surface water runoff and bridge construction risk altering river flow and flood regimes in the Fromus catchment.

Applicant's Response

The Applicant states that the proposed bridge crossing has been subject to detailed assessment in the Flood Risk Assessment [APP-292]. It claims the bridge design will clear-span the channel and banks, avoiding physical impacts on flow regime. The Applicant further asserts that flood modelling, reviewed and approved by the Environment Agency, shows no impact on the floodplain or increase in flood risk. It adds that surface water runoff will be collected, treated, and attenuated using Sustainable Drainage techniques, secured by commitments W06 and W11 in the Outline Code of Construction Practice [APP-341].

SAND Counter Response

31. Construction Phase Risks Overlooked

The Applicant's response focuses on the operational design of the bridge but fails to address construction phase risks. Temporary works, piling, haul road construction, and machinery movements within the valley will disturb soils, alter drainage pathways, and increase sedimentation. These activities pose real risks to river flow and flood regimes, which are not mitigated by clear-span design alone.

32. Surface Water Runoff and Pollution

The Applicant claims runoff will be treated and attenuated, but provides no detail on capacity, maintenance, or enforcement. Construction traffic and exposed soils will generate significant runoff, carrying silt, hydrocarbons, and pollutants into the Fromus catchment. Sustainable Drainage Systems (SuDS) are only effective if properly maintained and monitored, yet no binding commitments or independent oversight are offered.

33. Flood Modelling Limitations

The Applicant relies on flood modelling approved by the Environment Agency. However, modelling is based on assumptions and does not account for cumulative impacts of multiple energy projects in East Suffolk or climate change-driven extreme rainfall events. Residents have direct experience of flooding in Saxmundham and Benhall, and their concerns cannot be dismissed by theoretical modelling alone.

34. Heritage and Landscape Impacts of Hydrological Change

Alterations to flow and flood regimes affect not only hydrology but also heritage and landscape



settings. The Fromus Valley is part of Hurts Hall's historic parkland and Saxmundham's southern gateway. Even minor changes in water levels or flow patterns risk degrading these sensitive settings, compounding landscape and heritage harm. The Applicant's response does not acknowledge these wider consequences.

REF 6.7.13 Working Hours and Community Disruption

SAND RR Statement

6.3 Proposed seven-day working hours exacerbate community disruption.

Applicant's Response

The Applicant proposes core construction hours of 07:00–19:00 Monday to Friday, and 07:00–17:00 on Saturdays, Sundays, and Bank Holidays. It clarifies that construction is not expected every Sunday or Bank Holiday, and restrictions apply, including a cap of 30 HGV movements per day and limitations on percussive piling. These restrictions are detailed in the Register of Environmental Actions and Commitments [APP-342]. The Applicant justifies extended hours as necessary to maintain programme flexibility and meet Government Clean Energy Action Plan targets. It claims traffic and transport assessments [APP-054] show no significant adverse effects, and commits to ongoing dialogue with the Local Highway Authority.

SAND Counter Response

35. Seven-Day Working Is Excessive and Disruptive

The Applicant's proposal for weekend and Bank Holiday working represents a fundamental change to community life. Saxmundham and surrounding villages are quiet rural communities where weekends and holidays are valued for respite. Introducing construction noise, HGV traffic, and activity seven days a week removes this respite and exacerbates disruption. The Applicant's assurance that activity will not occur "every Sunday or Bank Holiday" is vague and unenforceable.

36. Restrictions Do Not Prevent Harm

The Applicant cites caps on HGV movements and limits on percussive piling. However, 30 HGV movements per day still represents significant disruption in narrow rural streets, particularly when combined with noise from plant, alarms, and general construction activity. Even "low-impact" activities generate noise, dust, and traffic that intrude on residential amenity. These restrictions do not prevent harm; they merely ration it.

37. Programme Flexibility vs. Community Wellbeing

The Applicant justifies extended hours as necessary to meet Government Clean Energy Action Plan targets. National policy does not permit community wellbeing to be sacrificed for programme convenience. EN-1 4.2.11 requires applicants to minimise disruption to local communities. Seven-day working prioritises project scheduling over residents' health, amenity, and quality of life.

38. Assessment Understates Real-World Effects

The Applicant's traffic and transport assessments conclude "no significant adverse effects." This conclusion is not credible. Residents will experience noise, vibration, dust, and traffic intrusion during weekends and holidays, when baseline activity is lowest and disruption most keenly felt. The assessments fail to capture the lived experience of continuous disruption in a rural town.

39. Lack of Binding Safeguards

The Applicant's commitments are framed as "ongoing dialogue" with the Local Highway Authority. Dialogue is not a safeguard. Without binding conditions on working hours, activity types, and enforcement, residents face prolonged uncertainty and disruption. The Examining Authority should require strict limits on working hours, excluding Sundays and Bank Holidays, to protect community wellbeing.



REF 6.7.14 Ecology and Biodiversity

SAND RR Statement

7.1 Removal of hedgerows, mature trees and farmland will fragment habitats, severing wildlife corridors and displacing ground-nesting birds, brown hares, reptiles, and aquatic fauna in the River Fromus.

Applicant's Response

The Applicant states that habitat fragmentation and wildlife disturbance have been assessed in Chapter 2 Ecology and Biodiversity [PDA-017]. It claims detailed proposals for addressing disturbance and ensuring connectivity of habitat for mobile wildlife are included in PDA-017 and the Outline Landscape and Ecological Management Plan – Suffolk [AS-059].

SAND Counter Response

40. Habitat Fragmentation Is Irreversible

The Applicant acknowledges habitat fragmentation but treats it as a mitigable effect. Removal of hedgerows, mature trees, and farmland severs ecological corridors that have developed over centuries. These features cannot be replaced by planting schemes within the project's timescale. Fragmentation is permanent and will displace species such as brown hares, reptiles, and ground-nesting birds, which rely on continuous habitat networks.

41. Connectivity Measures Are Speculative

The Applicant refers to "ensuring connectivity" through management plans. These measures are speculative and untested. Artificial corridors or planting strips cannot replicate the ecological function of established hedgerows and mature woodland. Mobile species may adapt partially, but less mobile species (reptiles, amphibians, aquatic fauna) will suffer displacement and population decline.

42. River Fromus Aquatic Impacts Overlooked

The Applicant's response does not address aquatic fauna in the River Fromus. Construction of the bridge, haul roads, and drainage works will disturb riparian habitats, increase sedimentation, and alter water quality. These impacts directly affect fish, amphibians, and invertebrates, yet the Applicant provides no specific mitigation beyond generic references to SuDS and connectivity.

43. Biodiversity Net Gain Not Demonstrated

National policy (NPPF 187) requires developments to deliver measurable biodiversity net gain. The Applicant's reliance on outline management plans does not demonstrate how net gain will be achieved. Replacement planting decades in the future cannot offset immediate losses of mature habitat. The Examining Authority should require clear, quantified biodiversity net gain commitments, not vague assurances.

44. Conclusion on Ecology and Biodiversity Theme

The Applicant's response is inadequate. It acknowledges habitat fragmentation but downplays its permanence, relies on speculative connectivity measures, ignores aquatic impacts, and fails to demonstrate biodiversity net gain. The Examining Authority should give little weight to the Applicant's assurances and recognise that removal of hedgerows, mature trees, and farmland will irreversibly fragment habitats, sever wildlife corridors, and displace species in the Fromus catchment.

REF 6.7.15 Ecology and Biodiversity – Incomplete Surveys

SAND RR Statement

7.2 Incomplete Surveys: Baseline data for bats (including barbastelle and Nathusius' pipistrelle), dormice, great crested newts, reptiles and birds (notably golden plover) are outdated, spatially limited or inconclusive.



Applicant's Response

The Applicant claims these comments mirror those raised by SEAS and refers to its response in Application Document 9.34. It asserts that surveys are not outdated and that coverage has enabled good characterisation of wildlife populations. The Applicant acknowledges only one “inconclusive” record of a possible dormouse nest in October 2024, which it considers precautionary and consistent with the Hazel Dormouse Mitigation Handbook (3rd Edition). It concludes that there is a low expectation of encountering dormice, as agreed with Suffolk Councils.

SAND Counter Response

45. Outdated and Spatially Limited Surveys

The Applicant's assertion that surveys are “not outdated” ignores the fact that ecological baselines are dynamic. Species such as barbastelle bats, Nathusius' pipistrelle, and golden plover are highly mobile and sensitive to seasonal and annual variation. Surveys conducted years earlier or limited to narrow transects cannot provide an accurate or current picture of populations. Reliance on outdated or spatially limited data risks underestimating impacts.

46. Inconclusive Dormouse Evidence Downplayed

The Applicant dismisses the October 2024 dormouse record as “not characteristic.” This minimises the precautionary principle. Even a single ambiguous record indicates potential presence, requiring robust follow-up surveys. The Applicant's reliance on a “low expectation” agreed with councils is insufficient. Dormice are cryptic species, and absence of evidence is not evidence of absence.

47. Insufficient Coverage for Protected Species

Great crested newts, reptiles, and ground-nesting birds such as golden plover require extensive, seasonally appropriate surveys across multiple years to establish reliable baselines. The Applicant's response does not demonstrate that surveys were comprehensive in time or space. Without adequate coverage, impacts on protected species cannot be properly assessed or mitigated.

48. Failure to Address Cumulative Impacts

The Applicant's response treats impact as temporary and isolated. This ignores cumulative effects of multiple energy projects in East Suffolk, which compound habitat loss, disturbance, and displacement. Incomplete surveys prevent proper assessment of cumulative harm to species populations and ecological networks.

49. Policy Non-Compliance

National policy requires applicants to provide up-to-date, comprehensive ecological data to inform decision-making. The Applicant's reliance on limited and inconclusive surveys does not meet this requirement. The Examining Authority should require updated, multi-season surveys before any conclusions on ecological impact are accepted.

REF 6.7.16 Ecology and Biodiversity – Missed Receptors

SAND RR Statement

7.3 Missed Receptors: No assessment of brown hare or pond habitats; ponds of principal importance within the Order Limits are ignored.

Applicant's Response

The Applicant argues that brown hares are not legally protected except from hunting under certain circumstances. It claims that although hare numbers have declined in some parts of the UK, they remain common and widespread. Because arable land is abundant locally and impacts on most fields are temporary during cable installation, the Applicant concludes no significant effect on brown hare would arise. It further states that no ponds are being lost due to the works, and therefore impacts on ponds were not assessed.



SAND Counter Response

50. Declining Populations Require Consideration

The Applicant's dismissal of brown hares because they are "not legally protected" is inadequate. Conservation concern is not limited to legally protected species. Brown hares are recognised as a priority species under the UK Biodiversity Action Plan due to significant national declines. Their omission from assessment ignores their ecological importance and undermines compliance which requires protection and enhancement of biodiversity, not just legally protected species.

51. Habitat Disruption Beyond Temporary Cable Works

The Applicant claims impacts are temporary. This overlooks the reality that construction activity fragments habitats, disturbs breeding cycles, and displaces species. Even short-term disruption during sensitive periods (breeding, nesting, overwintering) can cause long-term population decline. The assertion of "temporary" impact does not account for ecological sensitivity.

52. Ponds of Principal Importance Ignored

The Applicant dismisses pond impacts because "no ponds are being lost." This is a narrow interpretation. Ponds within the Order Limits are habitats of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006. Their ecological value lies not only in physical loss but in degradation from runoff, sedimentation, and disturbance. Ignoring ponds because they remain physically present fails to assess indirect impacts on amphibians, invertebrates, and aquatic plants.

53. Policy Non-Compliance

By omitting brown hares and ponds from assessment, the Applicant fails to comply with EN-1 and NPPF, which require comprehensive baseline data and assessment of all habitats and species of principal importance. The Examining Authority should note that the Applicant's selective approach undermines the credibility of its ecological assessment.

REF 6.7.17 Ecology and Biodiversity – Residual and Cumulative Harm

SAND RR Statement

7.4 The scale of residual, cumulative ecological harm, the unreliability of the Environmental Statement and HRA, and the lack of enforceable mitigation measures mean Sea Link cannot lawfully proceed. SAND strongly urges the Examining Authority to recommend refusal of development consent on ecological grounds.

Applicant's Response

The Applicant asserts that the Environmental Statement (ES) and Habitats Regulations Assessment (HRA) are reliable, and that survey coverage has enabled good characterisation of wildlife populations. It claims impacts are temporary in most fields and that mitigation measures in APP-049, AS-059, and APP-342 will prevent significant residual effects. The Applicant states these measures will be secured through Requirement 6 of Schedule 3 in the draft DCO [AS-087].

SAND Counter Response

54. Residual and Cumulative Harm Understated

The Applicant's response focuses narrowly on "temporary" impacts in individual fields, ignoring the cumulative scale of ecological harm across the Fromus Valley and wider Saxmundham landscape. Fragmentation of habitats, displacement of species, and disruption of ecological corridors are not temporary phenomena. Once severed, ecological networks cannot be restored within the project's timescale. The ES fails to account for cumulative impacts from overlapping energy projects in East Suffolk, which compound habitat loss and disturbance.

55. Reliability of ES and HRA Questioned

The Applicant insists the ES and HRA are reliable, but SAND has identified outdated, spatially limited, and inconclusive surveys (see bats, dormice, golden plover). Reliance on incomplete baselines undermines the credibility of conclusions. The HRA fails to apply the precautionary



principle required under the Habitats Regulations, dismissing potential impacts on European protected species without robust evidence.

56. Mitigation Measures Are Vague and Unenforceable

The Applicant cites APP-049, AS-059, and APP-342 as mitigation, but these are outline documents with generic commitments. They lack binding detail on monitoring, thresholds, enforcement, and penalties for non-compliance. Securing them through Requirement 6 of the DCO does not guarantee ecological protection; it merely embeds broad principles without enforceable standards. The Examining Authority cannot rely on vague assurances to offset irreversible ecological harm.

57. Legal Compliance Not Demonstrated

Under the Habitats Regulations, development consent cannot be granted where significant residual ecological harm remains or where mitigation is uncertain. The Applicant's reliance on outline plans and claims of "no significant residual effects" does not meet the legal threshold. Without robust, enforceable mitigation and reliable baseline data, the project cannot lawfully proceed.

REF 6.7.18 Cumulative Impact Assessment

SAND RR Statement

8.1 The aggregation of Sea Link, Lion Link, EA1N/EA2, and Sizewell C within a 6-mile radius has not been assessed holistically.

8.2 Combined effects on landscape, traffic, public services, housing, and community wellbeing are significant and exceed local capacity.

8.3 We request a full cumulative impact assessment covering overlapping traffic, noise, air quality, housing demand, emergency services, and community fatigue.

Applicant's Response

The Applicant claims cumulative effects have been assessed in Chapter 13 Inter-Project Cumulative Effects [APP-060], using a 20 km Zone of Influence (ZOI). It argues this exceeds SAND's suggested 6-mile radius. The Applicant states overlap between projects is limited in space and time, with peak traffic and construction activity short-lived. It highlights separation of cable routes and landfalls, intentional co-location of converter stations, and limited overlap with Sizewell C. The Applicant concludes cumulative effects are not significant, citing assessments of traffic, housing, and emergency services. It acknowledges some intra-project cumulative effects but claims mitigation will address them.

SAND Counter Response

58. Holistic Assessment Still Absent

The Applicant's reliance on a 20 km ZOI does not equate to a holistic cumulative assessment. SAND's concern is not about geographic extent but about aggregation of overlapping impacts within the Saxmundham–Friston–Sizewell corridor. The Applicant's compartmentalised approach underestimates the lived reality of multiple projects converging within a small rural area.

59. Temporal and Spatial Overlap Downplayed

The Applicant asserts that overlap is limited and short-lived. This ignores the fact that Sea Link, Lion Link, EA1N/EA2, and Sizewell C will all be under construction within overlapping timeframes. Even if activity shifts along cable routes, communities experience continuous disruption: traffic, noise, dust, and workforce influx. The claim of "short duration" is misleading when projects collectively span decades.

60. Community Capacity Exceeded

The Applicant dismisses impacts on housing and public services, claiming sufficient accommodation capacity. This ignores cumulative demand from multiple NSIPs. Local housing markets, emergency services, and health provision are already under strain. The influx of construction workers, combined with traffic congestion and noise, will exceed local capacity and erode community wellbeing.



61. Landscape and Amenity Impacts Understated

The Applicant's ZOI thresholds (e.g. 250 m for dust, 300 m for noise) artificially minimise impacts. Residents experience cumulative harm from multiple sources simultaneously: visual intrusion, traffic, noise, and air quality. Narrow ZOI definitions fail to capture the combined experiential burden on communities.

62. Lack of Confirmed Mitigation

The Applicant admits that mitigation for intra-project cumulative effects "cannot be confirmed at this stage." This undermines its assurance that impacts are not significant. Without binding, enforceable mitigation, communities face prolonged uncertainty and unaddressed harm.

63. Policy Non-Compliance

National policy (EN-1, NPS EN-5, and Planning Inspectorate guidance on cumulative effects) requires robust cumulative assessment. The Applicant's piecemeal approach fails to meet this requirement. By downplaying overlap and dismissing community fatigue, the Applicant avoids confronting the true cumulative burden.

REF 6.7.18 Cumulative Impact Assessment (Emergency Services)

Applicant's Additional Response

The Applicant states that while emergency services were not explicitly considered as a separate receptor, they were inherently included in assessments of highway safety and driver delay. It concludes that no significant effects on emergency services are likely. It adds that construction vehicle routing has been designed to minimise impacts across the highway network, as set out in the Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337].

SAND Counter Response

64. Emergency Services Not Explicitly Assessed

The Applicant admits emergency services were not explicitly considered. Treating them as "inherently included" in general traffic assessments is inadequate. Emergency services have unique requirements: rapid response times, priority routing, and resilience during peak demand. Generic traffic modelling does not capture these critical needs.

65. Risk of Delays and Reduced Response Times

Construction traffic, HGV movements, and roadworks will inevitably increase congestion and reduce road capacity. Even minor delays can have life-threatening consequences for ambulance, fire, and police response times. The Applicant's conclusion of "no significant effects" ignores the disproportionate impact of delays on emergency services compared to ordinary road users.

66. Lack of Binding Safeguards

The Applicant refers to vehicle routing designed to minimise impacts but provides no binding commitments or enforceable protocols prioritising emergency service access. Without guaranteed measures such as dedicated emergency access routes, traffic management contingencies, or real-time coordination with emergency services, assurances remain speculative.

67. Cumulative Strain on Emergency Services

The Applicant fails to consider cumulative impacts. With Sea Link, Lion Link, EA1N/EA2, and Sizewell C overlapping, emergency services will face increased demand from construction incidents, traffic accidents, and community health impacts. Ignoring this cumulative strain undermines the credibility of the assessment.

68. Policy Non-Compliance

National policy requires applicants to ensure developments do not compromise highway safety or emergency service access. By failing to explicitly assess emergency services as receptors, the Applicant has not demonstrated compliance.



REF 6.8.19 Conclusions

SAND RR Statement

9.1 SAND strongly urges the Examining Authority to reject the current Sea Link Development Consent Order. The converter station's siting, scale, and associated infrastructure pose disproportionate and irreversible harm to landscape character, local ecology, residential amenity, and heritage assets.

9.2 The inadequate consultation process has failed to capture the views of the wider community, and the piecemeal evolution of the project highlights a lack of strategic coordination, particularly in light of overlapping energy infrastructure proposals in the region.

9.3 We believe that the needs of energy transition must be balanced with genuine community engagement.

Applicant's Response

The Applicant reiterates that its rationale for location, design, and construction has been explained in previous sections. It claims extensive pre-application consultation and coordination with other energy infrastructure projects informed the development of the Proposed Project.

SAND Counter Response

69. Disproportionate and Irreversible Harm

The Applicant's response does not engage with the substance of SAND's conclusion. The siting and scale of the converter station will cause permanent harm to landscape character, heritage settings, and ecological networks. These impacts cannot be mitigated by cosmetic design measures or planting schemes. The Applicant's reliance on "rationale" does not alter the fact that irreversible harm is inherent in the chosen location.

70. Consultation Process Inadequate

The Applicant repeats its claim of "extensive consultation" but fails to address evidence that community views were excluded. Consultation was narrow, technical, and inaccessible, with targeted letters replacing genuine engagement. The piecemeal evolution of the project demonstrates reactive design changes rather than strategic planning. This undermines transparency and trust, contrary to the requirements of Section 47 of the Planning Act 2008.

71. Lack of Strategic Coordination

The Applicant asserts coordination with other projects but provides no evidence of holistic planning across Sea Link, Lion Link, EA1N/EA2, and Sizewell C. Co-location of converter stations is presented as intentional, yet cumulative impacts on communities, housing, traffic, and wellbeing remain unaddressed. Strategic coordination requires integrated assessment and mitigation, not piecemeal project-by-project rationalisation.

72. Energy Transition Must Balance Community Engagement

SAND recognises the importance of energy transition but insists it must be balanced with genuine community engagement. The Applicant's response does not acknowledge this principle. National policy requires applicants to minimise disruption and engage meaningfully with communities. The Applicant's failure to do so undermines the legitimacy of its case for consent.

Conclusion

The Sea Link Development Consent Order should be refused. The proposed converter station and associated infrastructure would impose **disproportionate and irreversible harm** on East Suffolk's landscape, heritage, ecology, and residential amenity. Its siting and scale would permanently alter the character of Saxmundham's southern gateway and the Fromus Valley, fragmenting habitats, severing wildlife corridors, and degrading historic parkland.



The Applicant's Environmental Statement and Habitats Regulations Assessment are unreliable, based on outdated and spatially limited surveys, and fail to apply the precautionary principle. Mitigation measures are vague, speculative, and unenforceable. Consultation has been narrowing and exclusionary, with community voices sidelined and alternative sites dismissed without transparent evidence.

Cumulative impacts from overlapping projects — Sea Link, Lion Link, EA1N/EA2, and Sizewell C — have not been assessed holistically. Communities face overlapping disruption from traffic, noise, dust, housing demand, and workforce influx, with emergency services capacity ignored. Extended working hours, seven-day activity, and heavy construction traffic will erode public health and wellbeing, while assurances of “no significant adverse effects” lack credibility.

National policy requires applicants to avoid harm, deliver biodiversity net gain, and meaningfully engage communities. Sea Link fails these tests. Energy transition must be achieved with genuine community engagement and respect for place, not at the expense of East Suffolk's environment, heritage, and identity.

SAND strongly urges the Examining Authority to recommend refusal of development consent. The Sea Link DCO, as currently proposed, cannot lawfully or responsibly proceed.